CHILD PROTECTION AND SAFEGUARDING POLICY & PROCEDURES

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This policy can be made available in large print or another accessible format if required to comply with the Equality Act 2010

CHILD PROTECTION AND SAFEGUARDING AT DOWNSIDE SCHOOL

Anyone who has concerns about a child's welfare, including if there is a concern that the child is suffering significant harm or is likely to do so, should make a referral to our Designated Safeguarding Lead (DSL) – unless an allegation is against them or another member of staff, when the Head must be informed - and in all cases the guidelines laid down by the DfE and South West Child Protection Procedures must be followed – the latter are online procedures, which are regularly updated. Key staff should upload this website to their desktop for instant access.

Anyone however, can make a referral, if necessary (see section below on 'Whistleblowing')

The Designated Safeguarding Lead (DSL) will inform the Head of all cases of actual or suspected abuse. The only exception to this would be if the Head were implicated in the concerns, in which case the Chair of Governors would be informed. Any concerns relating to the Designated Safeguarding Lead (DSL) should be referred to the Head.

Role	Name	Email	Date
Chair of Governors	**John Ludlow**	**jludlow@downside.co.uk**	**Aug 2026**
Safeguarding Governor	**Terri Wilcox**	**twilcox@downside.co.uk**	**Aug 2026**
Head Teacher*	**Mike Randall**	**mrandall@downside.co.uk**	**Aug 2026**
Designated Safeguarding Lead (DSL)*	**Michelle Pye**	**mpye@downside.co.uk** **Safeguarding@downside.co.uk**	**Aug 2026**
Deputy DSL (s)*	**Mike Randall**	**mrandall@downside.co.uk**	**Aug 2026**
	Dafydd Jones	**djones@downside.co.uk**	**Aug 2026**
	Oliver Simper	**osimper@downside.co.uk**	**Aug 2026**
	Belen Iglesias	**biglesias@downside.co.uk**	**Aug 2026**
Designated Teacher for Looked After Children*	**Michelle Pye**	**mpye@downside.co.uk**	**Aug 2026**
Senior Mental Health lead* (non-mandatory)	**Michelle Pye**	**mpye@downside.co.uk**	**Aug 2026**
Prevent Lead	**Michelle Pye**	**mpye@downside.co.uk** **safeguarding@downside.co.uk**	**Aug 2026**
Medical/Allergy Lead	**Michelle Pye**	**mpye@downside.co.uk**	**Aug 2026**
Confidential safeguarding mailbox: safeguarding@downside.co.uk			
The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education (2026)			

**Any changes to key personnel/holiday/emergency contacts will be shared with the appropriate agencies.*

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ALL SCHOOL STAFF SHOULD KNOW WHERE THEY CAN ACCESS THIS CHILD PROTECTION GUIDANCE

1. Introduction

This policy identifies and understands the ways in which children need to be safeguarded. It is essential that everybody working in a school understands their safeguarding responsibilities (KCSIE 2026)

Staff working with children are advised to maintain an attitude of "**it could happen here"** Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18.
Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.

To fulfil this responsibility effectively, **all staff** should make sure their approach is child centred. This means that they should consider, always, what is in the **best interests** of the child. (KCSIE 2026). Victims of harm should **never** be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy designated safeguarding lead.

Downside School is committed to safeguarding and promoting the welfare of children by:

- The provision of a safe environment in which children and young people can learn.
- Acting on concerns about a child's welfare immediately.
- Fulfilling our legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm.

Whistleblowing and Public Interest Disclosure

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. 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.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to

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decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse, neglect & exploitation, female genital mutilation or other so-called honour-based abuse, and extra-familial threats like radicalisation, sexual and criminal exploitation and serious violence.

Staff Code of Conduct

This policy should be read in conjunction with the staff code of conduct. This is available, internally, for staff on the Teams Information drive: Click here Overall Aims

This policy will contribute to the safeguarding of children at **Downside School** by:

- Clarifying safeguarding expectations for members of the education setting's community, staff, volunteers, governing body, learners, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values; and that our learners are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice, and are listened to.
- Understanding extra-familial risks, recognising that the setting's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the setting's community (staff, learners, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with learners, parents, and other agencies in the Local Safeguarding Partnership including Early Help/Family Help.

Downside School is named as a relevant agency in the Local Safeguarding Partnership (Somerset Safeguarding Children Partnership). This policy sets out its statutory duty to co-operate, follow and comply with published arrangements as set out by the Somerset Safeguarding Children Partnership's professional expectations, roles, and responsibilities. We practise safer recruitment in checking the suitability of all staff and volunteers who work at Downside in accordance with the guidance given in *Keeping children safe in education (September 2026)* this may include a digital screening process as part of due diligence prior to interview;

- Independent School Standards Regulations, Schedule 1, Part 4; the National Minimum Standards for Boarding Schools 2022. (The School's Recruitment Policy is contained in Employee Handbook available in Information Drive on School computer system and from Human Resources);
- It raises awareness of child protection and safeguarding issues and equips children with the knowledge and skills needed to keep themselves safe through, for example, use of online resources, the content of the curriculum and PSHE, together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices , online safety, building resilience to protect themselves and their peers and provides information about who they should turn to for help;
- It develops and implements procedures for identifying and reporting cases, or suspected cases, of abuse;
- It supports pupils who have been abused in accordance with their agreed child protection plan;
- We recognise that because of the day-to-day contact with children, staff are well placed to observe the outward signs of abuse.

Downside School will therefore:

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- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to and heard by a trusted adult;
- Ensure children know that there are adults in Downside School whom they can approach if they are worried;
- Include opportunities in the Personal, Social, Health and Economic (PSHE) Education and Relationships and Sex Education (RSE) curriculum for children to develop the skills they need to recognise and stay safe from abuse including child on child abuse.
- Take a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for any discrimination in relation to, age, race, faith, gender, sexual orientation or disability eg sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. These are underpinned by the school behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education (September 2026) and Working Together to Safeguard Children (March 2026). We comply with this guidance and the procedures set out by our local safeguarding children partnership.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the School;
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children;
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18;
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM;
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children;
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children;
- Statutory guidance on the Prevent duty 2023 which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism;
- We will follow the South West Child Protection Procedures and those set out by the Somerset Safeguarding Children Partnership and take account of guidance issued by the DfE;
- Human Rights Act 1998;
- Equality Act 2010;
- Crime & Policing Act 2026

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- Public Sector Equality Duty (advice for schools).
- Generative artificial intelligence (AI) in education – GOV. UK
  - . Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)
  - The Education (Independent School Standards) (England) Regulations 2003
  - Teachers' Standards (Guidance for school leaders, school staff and governing bodies)
  - Information sharing statutory duty guidance 2026
  - Filtering and monitoring standards in schools and colleges (DfE)
  - Use of reasonable force and other restrictive interventions guidance
  - Local Guidance from the Local Safeguarding Children Partnership: Policies and Procedures - Somerset Safeguarding Children Partnership

3. Definitions

Safeguarding and promoting the welfare of children means:

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children 2026 as:
• providing help and support to meet the needs of children as soon as problems emerge.
• protecting children from maltreatment, whether that is within or outside the home, including online.
• preventing impairment of children's mental and physical health or development.
• ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
• taking action to enable all children to have the best outcomes.

Child Protection is part of safeguarding and promoting the welfare of children and is defined in Working Together to Safeguard Children as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online.

Under statutory guidance and legislation action must be taken to safeguard and promote the child's welfare.

Effective safeguarding is anti-discriminatory and anti-racist.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Appendix 1 explains the different types of abuse.

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
Children includes everyone under the age of 18, however this policy applies to all pupils.

4. Equality and diversity

With regards to safeguarding we will consider our duties under the Equality Act 2010 and our general and specific duties under the Public Sector Equality Duty. General duties include:

1. Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
3. Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under Downside School's Equality, Diversity and Inclusion statement and are available on our school website: Downside School Policies - Downside School

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Procedure in Downside Academic and Curriculum Policy

Downside School also adheres to the principals of and promotes anti-oppressive practice in line of the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

Identifying and monitoring the needs of vulnerable learners.

The DSL and Deputy DSL will regularly review and monitor those children who have been identified as vulnerable and those children who are potentially at greater risk or harm. This can include reviewing attendance data, behaviour data, attainment data and safeguarding records. This is to ensure that:

- Proportionate and early interventions can be taken to promote the safety and welfare of the child and prevent escalation of harm.
- Information is shared with teachers and school and leadership staff to promote educational outcomes.
- Learners who currently have, or have had, a social worker, including those in kinship care, will have their academic progress and attainment reviewed and additional academic support will be provided to help them reach their full potential.
- Reasonable adjustments are made in relation to school-based interventions – for example responding to behaviour.

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Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All school staff should be particularly alert to the potential need for additional support for a child who:

• is disabled or has certain health conditions and has specific additional needs •
has special educational needs (whether or not they have a statutory Education, Health and Care plan)

• has a mental health need

• is a young carer • is pregnant and/or is a parent themselves

• has exhibited early signs of abusive, violent and/or harmful behaviours

• is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines

• is frequently missing/goes missing from education, home or care

• has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit 11

• is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation

• is at risk of being radicalised into terrorism

• has a parent or carer in custody, or is affected by parental offending

• is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

• is misusing alcohol and other drugs themselves

• is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and

• is a privately fostered child.

5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Somerset Local Safeguarding Children Partnership. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand Part 1 those working directly with children will also read Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (September 2026), and review this guidance at least annually.

All staff will be aware of:

- systems in place which support safeguarding including reading this Safeguarding/Child Protection Policy; the Behaviour Policy; the Staff Code of Conduct ; safeguarding response to children who go missing or are absent from education; and the role of the Designated Safeguarding Lead (DSL).
- Know who and how to contact the DSL and any deputies, the Chair of Governors and the Governor responsible for safeguarding.
- All staff will be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
    - who may need a social worker and may be experiencing abuse or neglect.
    - requiring mental health support.
    - may benefit from early help.

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- where there is a radicalisation concern.
- where a crime may have been committed.

- Be clear as to the setting's policy and procedures about child on child abuse, children missing or absent from education and those requiring mental health support, and the impact of technology in relation to online safety including online filtering and monitoring processes.
- Be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- Record concerns appropriately and in a timely manner by using the setting's safeguarding systems.
- Be aware of the need to raise to the senior leadership team any concerns they have about safeguarding practices within the school.

- All staff to contact the DSL in **person or by phone** if they have a Child protection concern.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- The schools part in discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements;
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM which requires Mandatory reporting, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM, child on child abuse and radicalisation;
- Aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Section 12 and appendix 4 of this policy outline in more detail how staff are supported to do this.

Safeguarding in the curriculum

Downside School is dedicated to ensuring that children are taught about how to keep themselves and others safe, including online. We recognise that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND). This is part of a broad and balanced curriculum. This includes:

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- Working within statutory guidance in respect to Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk);
- Personal, Social, Health and Economic (PSHE) education, to explore key issues at an age-appropriate stage such as:
    - healthy and respectful relationships
    - boundaries and consent
    - stereotyping, prejudice and equality
    - body confidence and self-esteem
    - how to recognise an abusive relationship, including coercive and controlling behaviour
    - the concepts of, and laws relating to - sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called 'honour'-based violence such as forced marriage and FGM, and how to access support, and
    - what constitutes sexual harassment and sexual violence and why these are always unacceptable.

- A whole-setting preventative education approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict
- appropriate filtering and monitoring systems are in place to ensure that 'over- blocking' does not lead to unreasonable restrictions as to what children can be taught about online teaching and safeguarding. (Further information can be found in KCSIE 2026)

- The curriculum will be shaped to respond to safeguarding incident patterns in the setting identified by the DSL and safeguarding team (e.g., to respond to an increase in bullying incidents).
- Providing engagement opportunities with parents and carers to consult on key aspects of the curriculum.
- Enabling learners to inform the curriculum via discussions with the school council.

5.2 The Designated Safeguarding Lead (DSL)

Our DSL is Mrs Michelle Pye. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Mrs Michelle Pye, Head of Nursing, (mpye@downside.co.uk) , 01761 235128)
When the DSL is absent, the deputies that will act as cover are:

1. Mr Michael Randall, Head (mrandall@downside.co.uk, 01761 235100 Ext. 102)
2. Mr Dafydd Jones Director of Pastoral Care (djones@downside.co.uk Tel – 01761 235 116
3. Mr Oliver Simper Deputy \Head (co curricular) & Head of Geography osimper@downside.co.uk Tel: 01 761 235 ext 310
4. Mrs Belen Iglesias Head of Key Stage 3 and Head of Modern Languages biglesias@downside.co.uk Tel : 01761 235 100

Role of the Designated Safeguarding Lead (DSL) and Deputies (DDSL)
Duties are further outlined in Keeping Children Safe in Education (2026, Annex B)

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Details of our DSL and Deputy DSL and how to contact them are available on the **Downside School** website, our newsletters, the notice board in reception and on posters throughout the school. We also have a confidential safeguarding mailbox : safeguarding@downside.co.uk

- The DSL is a senior member of staff who undertakes lead responsibility for safeguarding and child protection within the setting.
- The DSL (and any deputies) have undertaken the **SSCP** Advanced Child Protection Training to ensure they are compliant with the SSCP requirement for DSLs.
- The DSL works with the Head Teacher, and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that learners in need are experiencing or have experienced, and identifying the impact that these issues might be having on learner's attendance, engagement and achievement at school.
- Activities include the management of work undertaken by any Deputy DSLs.
- Manages early identification of vulnerability of learners and their families from staff through cause for concerns or notifications. This will ensure detailed, accurate, secure written records of concerns and referrals.
- Manages referrals to local safeguarding partners where learners with additional needs have been identified. These can include those –

    - who need a social worker and may be experiencing abuse or neglect.
    - requiring mental health support.
    - who may benefit from early help/family help.
    - where there is a radicalisation concern.
    - where a crime may have been committed.

The DSL will also:

- Work with others – acting as a point of contact for outside agencies about safeguarding.
- Support and advise other staff in making referrals to other agencies.
- When required, liaise with the case manager and the Local Authority Designated Officer (LADO) Service in relation to child protection cases which concern a staff member.
- Coordinate regular safeguarding training and updates and raise awareness and understanding to the school community around policies and practice in relation to safeguarding.
- Help promote educational outcomes by sharing information about vulnerable learners with relevant staff. This includes ensuring that staff:
    - know who these children are,
    - understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
    - Are supported to identify the challenges that children in this group might face.
    - Provide additional academic support or make reasonable adjustments to help children who have **or have had** a social worker to reach their potential.
- Ensure the secure transfer of the Child Protection File when a child moves to a new setting-within 5 days for in year transfer or the first 5 days of the start of a new term.

- Arrange adequate and appropriate cover arrangements for any out of hours/out of term activities, e.g. attendance at Strategy and Initial Child Protection Conferences out of term time and share out of term time contact details with the Local Authority
- Work with the SLT member who has lead responsibility filtering and monitoring systems to monitor and ensure their effectiveness and know how to escalate concerns when identified. Support the Filtering and Monitoring lead in conducting an annual review on filtering and monitoring which is presented to governors.
- Support the role and duties of the named lead for health, safety and site security.

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The DSL should:

- Ensure the school's child protection policies are known, understood and used appropriately;
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;
- Ensure the child protection policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the school in this;
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Liaise with the Head to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- **This should include being aware of the requirement for children to have an Appropriate Adult**. **Further information can be found in the Statutory guidance - PACE Code C 2019.**

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse, neglect and exploitation and have that support in place for when the child arrives.

5.3 The Governing Board

The Governing Board will approve this policy annually and hold the Head to account for its implementation.

Terri Wilcox is the Governor with responsibility for Child Protection at Downside School. (twilcox@downside.co.uk, 07853804716).

The Governing Board should ensure that the school contributes to multi-agency working in line with statutory guidance: Working Together to Safeguard Children 2026. The Governing Board should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018, DfE Data Protection Guidance for schools (DfE 2024b) and the GDPR.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head, where appropriate (see appendix 2).

Duties are further outlined in Keeping Children Safe in Education (2026, Part 2)

There is a senior board level lead who takes responsibility for the setting's safeguarding responsibility to ensure that safeguarding and child protection practice, process, and policy

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(including online safety) is effective and is compliant with legislation, statutory guidance, and Local Safeguarding Partnership arrangements.

- The appointed Safeguarding Governor will liaise with the Head Teacher and the DSL to produce an annual report for governors and complete the annual S175/157 safeguarding audit from Somerset Council.
    - Ensure that the school remedies any actions brought to its attention without delay.
    - Ensure that this document is updated annually (or when there are significant updates)
- Ensure that the DSL is an appropriate senior member of the school's senior leadership team and ensure that they have the appropriate status, authority, skills and experience within the school to carry out the duties of the post.
- Ensure that they attend SSCP training and that safeguarding learning for the school community is robust and effective.
- Ensure that learners are taught about safeguarding on the curriculum including online safety in compliance with statutory guidance Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk)
- Ensure that teachers, including supply teachers, trainee teachers, other staff, volunteers, and contractors have appropriate checks carried out in line with statutory guidance Keeping Children Safe in Education (DfE 2026, Part 3).
- Ensure that there are procedures in place to manage safeguarding concerns or allegations against teachers, including supply teachers, other staff, volunteers, and contractors who may not be suitable to work with or pose a risk to learners, this includes having a process to manage low level concerns.
- Ensure that systems are in place for learners to effectively share a concern about a safeguarding issue they are experiencing, express their views and give feedback.
- Ensure that the setting has systems in place to prevent, identify and respond to child-on-child harm (including sexual abuse and sexual harassment) and mental health concerns, and review the effectiveness of the setting's online safety practices including filtering and monitoring.
- Appoint a designated teacher to promote the educational achievement for children in care and other care arrangements.
- Receive an annual filtering and monitoring assurance report and review the effectiveness of arrangements.

5.4 The Head

The Head is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2).

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6 Confidentiality

6.1 A conversation in which pupils make a safeguarding disclosure of a child protection nature, about themselves or someone else, to any member of staff or volunteer, including the School's Safeguarding Lead (DSL), or in their absence to the deputy (DDSLs), will be kept private to those who need to know about the matter: these persons may include the Children's Social Care, the police, parents or other responsible persons. The DSL will tell the pupil involved to whom they will have to refer the matter and will try to achieve the pupil's agreement.

6.2 A conversation of a health and medical nature with a School Nurse or Doctor in the Health Centre will be kept confidential to the persons involved, unless in the opinion of the Nurse or Doctor it is potentially a child protection issue. In these circumstances the matter must be referred to the School's DSL or in their absence the DDSLs and the Nurse or Doctor will tell the pupil concerned that such a referral will be made.

In all situations regarding sensitive pupil matters, staff must respect the confidentiality of anything said to them by a pupil and only speak to those who need to know e.g. the Head of Nursing, the pupil's Tutor, House Master or House Mistress, the Director of Pastoral Care , or the Head. It is essential that information is passed on promptly and actions taken recorded accurately, dated and signed.

Confidentiality of pupils' records: A pupil's medical records are confidential to them and the Health Centre staff, and are not shown to other persons
Timely information sharing is essential to effective safeguarding.

- Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers DfE2026
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests;
- Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix 2.

7. Recognising abuse and taking action

All staff should be aware of the indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of the school (extra – familial harm)s), inside and outside of home, online and at school. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of children who may need help or protection

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

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Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Contact with the Designated Officer should be made by contacting Somerset Direct and asking to speak to the Designated Officer:
0300 123 2224

Or a referral can be made online at https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them, allowing them time to talk freely and do not ask leading questions;
- Stay calm and do not show that you are shocked or upset;
- Reassure them and let them know that they are being taken seriously, will be supported and kept safe; explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it;
- When writing up, best to use full names, not initials, to avoid ambiguity of identity;
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so then complete a MyConcern referral.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education (September 2026) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a pupil is *at risk* of FGM or discovers that a **pupil age 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures and contact the police on 101.

7.4 If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.

Where possible, **speak to the DSL** first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Early help

If Early Help or community-based Family Help Assessments are required, the DSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate School Staff may be required to support other agencies and professionals in an early help assessment (EHA) and Family Help Support

The DSL will keep the case under constant review, and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. All referrals should follow the correct referral process and be recorded immediately on My Concern

If you make a referral directly (see section 7.1), you **must** tell the DSL as soon as possible.

The local authority will decide within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

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Referrals to statutory agencies do not require parental consent.

7.5 If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

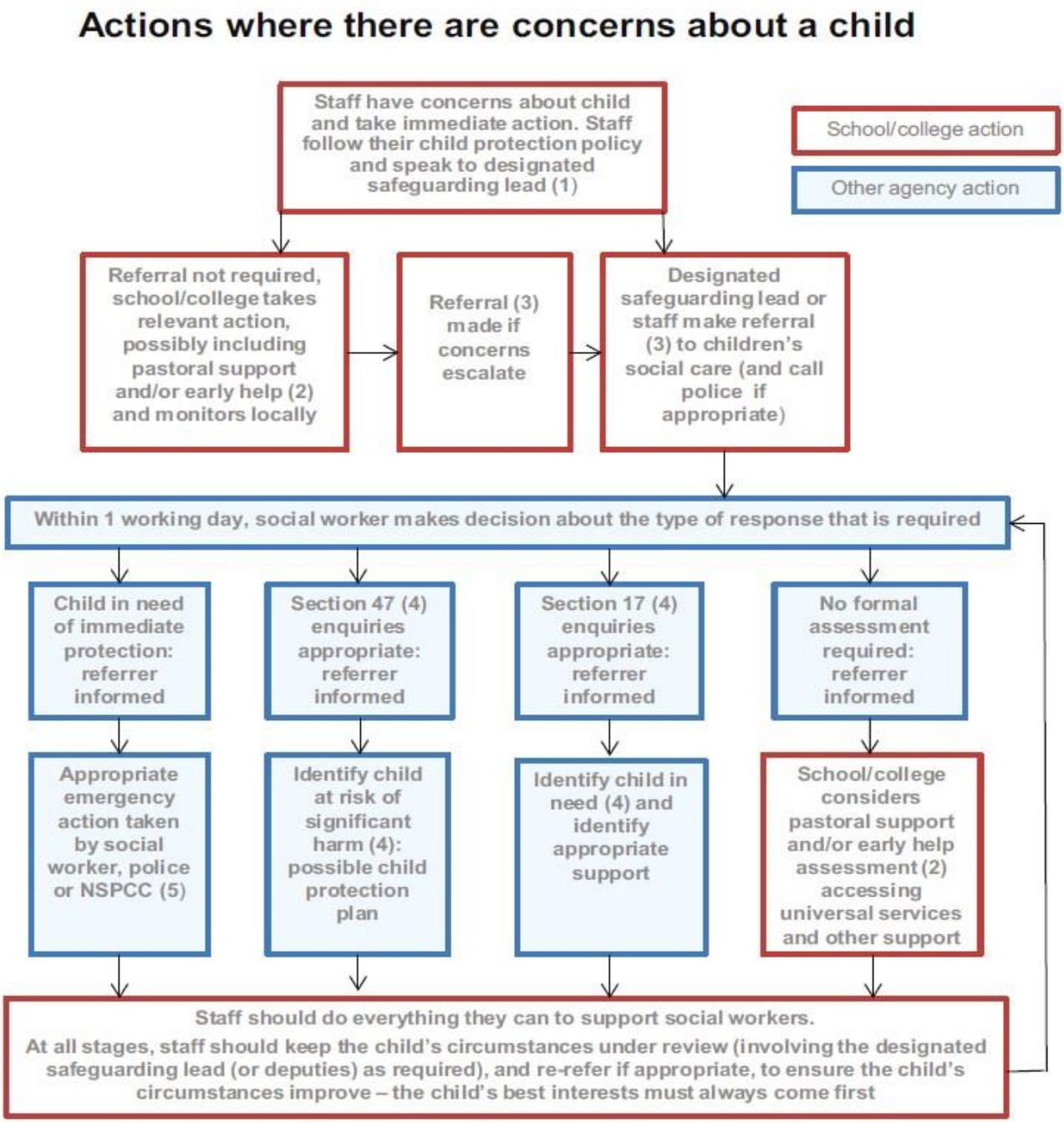
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- **Think someone is in immediate danger;**
- **Think someone may be planning to travel to join an extremist group;**
- **see or hear something that may be terrorist-related;**

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)

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Figure 1



(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).

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7.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the Head. If you have concerns about the Head, speak to the Chair of Governors.

You can also discuss any concerns about any staff member, contractors or volunteers with the DSL.

The Head /Chair of Governors/DSL will then follow the procedures set out in appendix 2, if appropriate.

The DSL (or Chair of Governors, in the case of a concern about the Head) will also inform the Designated Officer for the Local Authority (LADO).

7.6a Extra-familial (Contextual) Safeguarding

Downside School is fully committed to safeguarding and promoting the welfare of all children in our care. We recognise our responsibility to provide a safe and supportive environment, and we are mindful of the wider context in which safeguarding concerns may arise. This includes acknowledging non recent safeguarding issues associated with members of our Monastic Community who previously lived on site. We are dedicated to learning from the past, working transparently with our community, and ensuring robust safeguarding measures are in place to protect every child, now and in the future. The school is committed to extra familial safeguarding, transparency, and the continual strengthening of our safeguarding practices.

7.7 Child-on-Child abuse including harassment & Violence)

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up". Child on child abuse can happen inside and outside of school or online and as part of the digital world.
All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator

Child-on-child abuse is most likely to include, but may not be limited to:

• bullying (including cyberbullying, prejudice-based and discriminatory bullying),

• abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),

• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),

• serious physical assault and harm, or the threat of harm with a weapon,

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sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

, • sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,

• causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,

• consensual and non-consensual making or sharing of nudes and semi nudes

, • upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

• initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour;
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence;
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent;
- Ensuring pupils know they can talk to staff confidentially;
- Ensuring staff are trained to understand that Child on child abuse is considered a safeguarding concern

Responding to reports of sexual violence and sexual harassment

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Ultimately, any decisions are made on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required (further information is available in KCSIE Annex A).

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel

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ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Actions following a report of Sexual Violence and/or sexual harassment:

Sexual violence and sexual abuse can happen anywhere, and all staff are advised to maintain an attitude of 'it could happen here'.
Staff should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school.

The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school.

Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children;
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?;
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- That sexual violence and sexual harassment can take place within intimate personal relationships between children;
- Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- Are there ongoing risks to the victim, other children or school staff;
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

All staff will receive training on how to manage a report on child sexual violence or harassment.

If a pupil makes an allegation of abuse against another pupil:

- You must tell the DSL and record the allegation, but do not investigate it;
- The incident will be recorded on MyConcern;

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- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSL will put a risk assessment and support plan into place for all children involved – both the harmed (s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed;
- If there are any any sexual images on a device these should not be looked at by school staff
- Consideration will be given to any additional referrals to services required eg: Sexual Abuse Referral Centres and be considered as part of the case management.

7.8 Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with, serious violent crime and are experiencing criminal exploitation. These may include, disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school).a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. Risk factors which increase the likelihood of involvement in serious violence include being male, being excluded or frequently absent from school, having experienced maltreatment and having been involved in offending.

Any sign of these behaviours or risk factors should be reported to the DSL and recorded on MyConcern

8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

Referrals to statutory agencies do not require parental consent.
https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

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9. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

10. Complaints and concerns about school safeguarding practices

10.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

10.2 Other complaints

See Concerns/complaints Procedure for parents. These should be recorded on MyConcern.

10.3 Whistle-blowing

All staff are required to report to the Head or the DSL and the Senior Deputy Head (Academic) (in the absence of the Head, any concern or allegations about School practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. Alternatively, if the 'whistle-blower' considers the matter too serious or sensitive to raise within the internal environment of the school, the matter can, in exceptional cases, be reported to ISI or the Designated Officer at the Local Authority (LADO). There will be no retribution or disciplinary action taken against a member of staff for making such a report. All matters will be treated in strict confidence and anonymity will be respected wherever possible. If the allegation involves the Head then the Chair of Governors should be contacted.

Downside School has clear whistleblowing procedures suitably referenced in staff training and codes of conduct. It also promotes a culture of safety and of raising concerns. It also maintains a culture of valuing staff and of reflective practice. There are procedures for reporting and handling concerns, including about poor or unsafe practice and potential failures in the school's safeguarding regime, and there will be provision for mediation and dispute resolution where necessary. Training and support will be provided for staff. There will be transparency and accountability in relation to how concerns are received and handled.

Head (Michael Randall)	mrandall@downside.co.uk	01761 235100 Ext. 102
Chair of Governors (John Ludlow)	jludlow@downside.co.uk	07808 094 542
ISI	concerns@isi.net	020 7710 9900
Designated Officer (LADO)	SomersetLADO@somerset.gov.uk	0300 123 2224

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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 – line is available from 8:00 am to 8:00 pm, Monday to Friday and Email: help@nspcc.org.uk

General guidance can be found at Advice on whistle-blowing - https://www.gov.uk/whistleblowing

For further comprehensive guidance on whistle blowing please see Public Concern at Work website.

11. Record-keeping

We will hold records in line with our Document Retention Policy.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on My Concern in a timely fashion. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

11.1 Information Sharing

Downside School is committed to have due regard to relevant data protection principles which allow for sharing (and withholding) personal information as provided for in the Data protection Act 2018, UK General Data Protection Regulations and the Data (Use and Access) Act 2025. This includes how to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'.

Staff at the setting are aware that:

- 'Safeguarding' and 'individuals at risk' is a processing condition that allows practitioners to share special category personal data.
- They should refer to DfE stat guidance template

There may be times when it is necessary to share information without consent such as:

- To gain consent would place the child at risk,
- by doing so will compromise a criminal investigation,
- It cannot be reasonably expected that a practitioner gains consent
- or, if by sharing information it will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent.

There are also times when **Downside School** will not provide pupil's personal data where the serious harm test under legislation is met, (by sharing the information the child may be at further risk). When in doubt **Downside School** will seek legal advice.

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The Data Protection Act 2018 and UK 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.

Reporting concerns

All staff are clear about recording and reporting concerns to the DSL/Deputy DSL in a timely way. In the case a learner is in immediate danger, staff should phone the police.

All staff are aware of and follow the procedures to respond to a concern about a child. This includes responses to child-on-child harm and learners who present with a mental health need (Appendix B).

At **Downside School**, all pupils are provided with a *Worries and Concerns Guide*. This guide explains the support available to them if they are worried about anything and outlines the steps they can take if they have concerns about their wellbeing, safety, or the way they are being treated. Pupils are encouraged to speak to a trusted adult and are reassured that their concerns will be listened to, taken seriously, and responded to appropriately.

Children can raise their concerns via a confidential reporting system: My Voice

https://form.thesafeguardingcompany.com/e0e663e3-14df-49a6-8784-b3772467c82c

Procedures for reporting child protection or child welfare concerns are outlined in Appendix 2 of this policy. Reporting concerns in accordance with these procedures is of primary importance. It is then important to ensure that an accurate record is kept.

All safeguarding & Child Protection concerns must be recorded electronically using MyConcern. This can be accessed in various ways – on your Microsoft Office top ribbon in Downside Favourites click on the dropped down box and My Concern tab is there.

Using the QR code as below:

All staff safeguarding concerns including self-reporting and allegations must be reported using the MyConcern Safeguarding Platform.
Using the QR code as below staff will enter the portal using STAFF Safeguarding portal within the entry page to My Concern
Should any staff member find that they cannot access the 'My Concern Staff Safeguarding Concerns' they should contact the DSL or the Head.

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All self-reporting and staff allegation management decisions will be recorded on the staff safeguarding My Concern

Records should include:

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

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

12. Safeguarding training for staff

Governing bodies and proprietors will ensure that all staff members undergo the Somerset Safeguarding Child Partnership (SSCP) safeguarding and child protection (including online safety) training at induction.

12.1 - All staff:

- Will receive appropriate safeguarding and child protection (including online safety) refresher training at least annually (via formal training, email e-bulletins and staff meetings).
- Must complete Female Genital Mutilation (FGM) awareness training and will understand their legal duty under the Mandatory Reporting Duty.
- Must complete PREVENT awareness training annually. This is to ensure that they can comply with the legal expectations under the PREVENT duty.
- Will receive training which includes clear reference to staff codes of behaviour and professional boundaries, and on the reporting of low-level concerns, internal whistleblowing policy and guidance for escalation. All staff should receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

12.2 - Designated Safeguarding Lead and deputies:

- Will undergo formal training provided by the Somerset Safeguarding Children's Partnership (SSCP) to provide them with the knowledge and skills and training (including online safety) required to carry out the role. The training will be updated every two years.
- Deputies will be trained to the same level as the DSL.
- The DSL and any deputies will liaise with the SSCP and Somerset Education Safeguarding Service to ensure that their knowledge and skills are updated. This could be via e-bulletins, attending DSL network meetings, attending additional training and taking time to read and digest safeguarding developments.

12.3 - Other training considerations:

- The governing body will ensure that at least one person on any appointment panel will have undertaken safer recruitment training, in line with School Staffing (England) Regulations 2009.
- Members of the senior leadership team will make themselves aware of and understand their role within the local safeguarding arrangements. This will ensure that those who have responsibility for the management of behaviour, inclusion, Special Educational Needs, attendance, and exclusions will carry out their duties with a safeguarding consideration.
- The Designated Teacher for Children in Care will undergo appropriate training to fulfil their role to promote the educational achievement of registered pupils who are in care.
- The mental health lead has access to appropriate training.

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- Training around safeguarding issues in Annex A (including online safety and filtering and monitoring) will be integrated, aligned, and considered as part of a whole school safeguarding approach.
- Staff who are likely to need to use reasonable force and/or other restrictive interventions should be adequately trained in its safe and lawful use and in preventative strategies.
- Governors and trustees receive appropriate safeguarding and child protection training at induction.

All staff will receive training on how to manage a report on child sexual violence or harassment.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

12.4 Governors

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

13. Safer recruitment and safer working practice

Downside School pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education, Part Three' (2026), ensuring we maintain an accurate Single Central Record.

- This includes scrutinising applicants, by verifying identity and academic or vocational qualifications, obtaining professional and character references,
checking previous employment history and identifying any gaps within this, and ensuring that a candidate has the health and physical capacity for the job. References are always obtained, scrutinised and concerns resolved satisfactorily before appointment is confirmed.
- It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks (and overseas checks if appropriate), dependent on the role and duties performed, including regulated and non-regulated activity. An enhanced DBS with barred list check will be completed for all volunteers taking part in regulated activity in line with The Crime and Policing act 2026.
- Applicants must provide an application form and Curriculum Vitae will not be accepted as a stand-alone.
- As a setting we will conduct online searches as part of our due diligence checks on short listed candidates and inform them of this.
- All recruitment materials will include reference to **Downside School's** commitment to safeguarding and promoting the wellbeing of learners.
- Where applicable, third-party assurances are sought for contractors who are required on site, including identification checks on arrival.
- Under no circumstances will a volunteer/employee/contractor on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

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13.1 – Work Experience

Where a person supervising a child on a work experience placement for a child under the age of 16, provides teaching, training, instruction, care or supervision frequently, on more than 3 days in a 30-day period, or overnight, this is regulated activity and an Enhanced DBS with barred list check will be requested.

Downside School cannot request an enhanced DBS check with barred list information from a work experience provider for staff supervising children aged 16 to 17; instead, Downside will seek assurance that the placement provider has appropriate safeguarding policies and procedures in place before any placement begins.

13.2 – Visitors

All visitors complete a signing in/out process, wear a school ID badge and are provided with key safeguarding information including the contact details of safeguarding personnel in school

Scheduled visitors in a professional role (e.g. fire officer, police, LA staff) are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at school. Careful consideration is given to the suitability of any external organisations. Professionals may also be required to provide a letter of assurance from their organisation that safer recruitment checks have been completed.

If the visit is unscheduled and the visitor is unknown to the school, we will contact the relevant organisation to verify the individual's identity and confirm the reason for the visit.

13.3 – Site Safety

Risk assessments are undertaken and maintained in accordance with the school's health and safety policy. The school ensures that when our premises are hired or rented to other organisations (ASC, evening and weekend clubs) including shared site providers who work with children, those organisations adhere to the guidance for out-of-school settings. After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK (www.gov.uk)

Where the school's premises are hired or rented to another organisation, Downside School will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place, including inspecting these where needed, and will ensure there are arrangements for the provider to liaise with the school on safeguarding matters. Safeguarding requirements will be included as a condition of use in any lease or hire agreement, and failure to comply with this could lead to termination of that agreement.

13.4 – Off site visits and exchange visits

We carry out a risk assessment prior to any off-site visit and designate the specific roles and responsibilities of each adult, whether employed or volunteers.

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Any adult over 18 in a host family will be subject to DBS checks. We work with partner schools abroad to ensure that similar assurances are undertaken prior to any overseas visit by our pupils

14. Use of restrictive interventions

At **Downside School** our aim is to create a safe, secure and supportive environment for all our pupils and staff. There are times when the use of restrictive interventions, including reasonable force and seclusion, is lawful and necessary to keep people safe. However, we understand that the use of restrictive interventions can have a significant impact on pupils, staff and parents/carers. In our school, they are only ever considered as a last resort, once all other prevention and de-escalation strategies have been exhausted.

The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation and will follow government guidance Use of reasonable force and other restrictive interventions guidance

- There is robust recording and reporting of any incident where restrictive interventions including reasonable force and seclusion have been used. Further review of the incident is carried out to reflect on how the incident could be avoided, this will involve the child and their family.
- Further details can be found in our behaviour policy/use of restrictive interventions policy.

Downside School Policies - Downside School

15. Monitoring arrangements

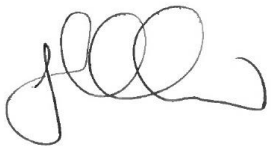
This policy will be reviewed **annually** by the Governing Body. At every review, it will be approved by the full governing board.

16. Links with other policies

This policy links to the following policies, which are available to view on the School's website: Downside School Policies - Downside School

1. **Pupil Behaviour Policy**
2. **Complaints Policy**
3. **Health and Safety Policy**
4. **Sex and Relationship Education Policy**
5. **First Aid Policy**
6. **Academic and Curriculum Policy**
7. **Antibullying Policy**
8. **Staff code of conduct**
9. **Restrictive interventions and use of reasonable force policy.**
10. **Mobile phone policy**

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Downside School Policy Approval Record	
Reviewed by	**Designated Safeguarding Lead**
Date	**August 2026**
Authorised by	
Date	**September 2026**
Next Review	**August 2027**
Circulation	**Governors / all staff / [volunteers] automatically** **Parents on request** **Published on the School's website**
Status	**Complies with ISI regulatory requirements September 2026** **Legislation and Statutory Guidance listed in Section 2 of this document**

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (September 2026).

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Appendix 1: Abuse and neglect

Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. **All** staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).
All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online. All staff should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Extra familial (Contextual) safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside these environments. 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, and serious youth violence.

Indicators of abuse and neglect

Physical abuse 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.

Some signs and symptoms include:

- Bruising – face, especially ears, cheeks, eyes, mouth or neck, suggestive of hand mark, strap marks;
- Multiple bruises of different ages;
- Bite marks;
- Small round burn marks – particularly on soft non protruding parts of the body e.g.
inside of legs, behind the knees;
- Fractures in very young children;
- Torn frenulum;
- Bleeding from mouth or ears;
- Fear of undressing in older child;

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- Bruising caused by implements.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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;**
- **Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;**
- **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;**
- **Seeing or hearing the ill-treatment of another;**
- **Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children;**
- **Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.**

Some signs and symptoms include:

- Severe and inappropriate discipline;
- Low warmth, high criticism;
- Attention seeking or withdrawal by child
- Fear of new situations;
- Developmental delay;
- Head banging, rocking, other forms of self-harm; • Enuresis and encopresis;
- Low self esteem.

Sexual abuse involves forcing, causing 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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
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 can take place online, and technology can be used to facilitate offline abuse.

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There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence regardless of whether they agreed to that activity
Sexual Offences Act 2003

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Some signs and symptoms include:

- Sexually transmitted diseases;
- Bruising to the genitals;
- Sexual awareness inappropriate to child's age;
- Inappropriate sexual behaviour – with others, or drawing or writing about inappropriate behaviour, etc;
- Genital trauma.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate caregivers);
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some signs and symptoms include:

- Constant hunger;
- Poor personal hygiene;
- Non-school or poor school attendance;
- Developmental delay;
- Failure to thrive;
- Inappropriate clothing for time of year;
- Failure to seek medical attention.

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put a child at risk of harm. Behaviours linked to issues such as drug taking or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

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Appendix 2: Allegations of Abuse or Low-Level concerns made against Staff

(References to staff in this process include all staff employed or engaged by Downside School , including part-time staff, supply staff, contractors, volunteers and casual staff).

Every Local Authority has a Designated Officer for Allegations Management who is available to provide support and advice to any organisation where staff work with children. This role also incorporates a monitoring function to ensure that all organisations work to complete allegations processes in a timescale appropriate for both the victim and the alleged perpetrator.

The Designated Officer must be informed immediately if an allegation has been made, and they will consult as necessary with the relevant personnel in Human Resources, and other agencies such as the Police, as appropriate.

Contact with the Designated Officer should be made by contacting Somerset Direct and asking to speak to the Designated Officer:
0300 123 2224

Introduction

Low Level Concern

A Low Level Concern is one that does not meet the harm threshold. The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour towards a child does not meet the harm threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- Is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work; and

- Does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Please read the Low Level Concerns Policy for procedures.

Allegation Of Abuse

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working, or who is in contact, 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

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- 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.

The allegations will be considered within the four categories of abuse i.e. physical, sexual, emotional abuse and neglect. They also include concerns relating to inappropriate relationships between adults and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual;
- Grooming i.e. meeting a child under 18 with intent to commit a relevant offence or grooming behaviour e.g. inappropriate text/email messages or images, gifts or socialising etc;
- Possession of abusive images of children.

Confidentiality will be upheld as far as possible at all times.

All members of the Downside community are entitled to receive care and protection from harm. We will not accept inappropriate behaviour towards children, staff or volunteers and will ensure that any concerns or allegations of impropriety are dealt with quickly, fairly and sensitively.

Any staff disclosing information regarding inappropriate behaviour by colleagues will be listened to and supported.

Parents of a child allegedly abused by a member of staff or other adult will be kept informed of the progress and outcome of any investigation.

Any member of staff facing investigation into an allegation of abuse will be offered appropriate access to professional and personal support networks and will be kept informed of the progress and outcome of any investigation.

Process

An allegation against a member of staff (including supply staff) or volunteer may arise from a number of sources e.g. a report from a child, a concern raised by another adult in the School or community, or a complaint by a parent or carer.

The person to whom the allegation or concern is first reported should treat the matter seriously and keep an open mind. They should not:

- Investigate or ask leading questions if seeking clarification;
- Make any assumptions or offer alternative explanations; or
- Promise confidentiality, but can give assurance that the information will only be shared on a "need to know" basis.

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They should:

- Make a written record of the information, including time, date and place of incident, persons present and what was said;
- Sign and date the written record;
- Immediately report the matter to the appropriate person (*Figure 1.*).

Figure 1. Summary of Process for reporting allegation of abuse

Allegation against…	**Report to…..**	**Head will….**	**Head**
Member of staff or volunteer	Head	Discuss with Designated Safeguarding Lead	Contact Designated Officer for advice. School only investigates after consultation with Designated Officer
Child Safeguarding Lead	Head		Report to Designated Officer
Head	Referred to Chair of Governors who will: 1)Inform Designated Officer 2)Inform Designated Governor		

Suspension

Where an allegation is made against a member of staff, the risk of harm to children posed by the accused member of staff should be evaluated. Suspension must not be an automatic response to an allegation, and should be considered only in cases where:

- There is cause to suspect that a child or other children at the School is/are at risk of significant harm should the member of staff remain in School; or
- The allegation is so serious as to constitute potential grounds for dismissal.

The School can seek advice from the Designated Officer on suspension if this is felt necessary. If the Designated Officer, police and children's social care have no objections to the member of staff continuing to work whilst an investigation is ongoing, the School will carefully consider whether there are any alternatives to suspension that can be put in place. Considerations will include:

- Redeployment of the member of staff within the School to avoid direct contact with the child or children concerned;
- Providing an assistant to be present when the member of staff has contact with children;

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- Redeployment of the member of staff to alternative work within the School so that he/she does not have unsupervised access to children; or
- Moving the child or children to classes where they will not come into contact with the member of staff, although only after consultation with the parents.

Where suspension is being considered, a meeting will be convened with the member of staff, where possible, to discuss the proposal to suspend and to allow the member of staff an opportunity to make representations about the potential suspension.

If there are no viable alternatives to suspension the Head or other designated Senior Manager may immediately suspend the employee from work on full pay and benefits whilst the investigation proceeds. The reasons and justification for suspension should be recorded by the School together with any alternatives which were considered, and the reasons why they were rejected. Written confirmation should be dispatched to the member of staff without undue delay, setting out the reasons for the suspension. If a member of staff is suspended, they should be advised to seek the assistance of their Trade Union or a legal adviser.

Suspension is a neutral act and is not indicative of any judgement on the part of the School. The suspension, and its terms, will be reviewed as necessary to ensure that it remains proportionate. The member of staff will be informed in writing of any change to the terms of their suspension. Alternative accommodation will be considered for a member of the boarding staff who is accommodated on the School's site, if child protection concerns make this necessary.

Where allegations against staff arise the School will make every effort to ensure confidentiality is maintained. Third parties, including other staff, should only be told about the allegation on a 'need to know basis'. Notification of any details may be delayed if the police or social services inform the School that this could prejudice any investigation they are conducting. If the matter becomes common knowledge, it may be necessary to issue a brief statement, agreed by the agencies concerned, to parents, pupils and the public. The School is however aware of the reporting restrictions set out in the Education Act 2011 and that a breach of these by the School or any other individual will constitute a criminal offence.

Lifting a suspension

A suspension will be lifted if:

- The results of the investigation indicate that there is no case to answer or that a formal disciplinary hearing is not necessary;
- A disciplinary process has been completed which did not result in the dismissal of the employee.

The suspension can only be lifted with the approval of the Governing Body. Normally this will be carried out by the relevant committee or by the chair of the Governing Body, using delegated authority or else as an 'urgency action'.

The decision to lift a suspension should be confirmed in writing, including the date on which the employee is expected to return to work and details of any arrangements to facilitate that return, such as a 'return to work' meeting. In planning a return to work after a suspension,

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managers should consider any needs of the member of staff after a period of absence, especially where the allegations have proved to be false or malicious. The employee may require both emotional and professional support to help re-establish their professional confidence and credibility and to help them re-integrate into their role.

Strategy

Once the structure of a staff support plan has been agreed, it should be clearly articulated to all relevant parties and should be monitored and reviewed to ensure progress for the individual concerned. Options that may be helpful include access to:

- Counselling;
- A named peer supporter;
- Mentoring from a member of the senior management team or other relevant staff;
- Support available from their union, professional association or employee assistance programme.

A plan should be jointly devised and set out what action is to be taken and by whom. Any strategy plan will need to include a review period to enable the school and others involved to monitor its effectiveness.

Internal Investigation and Disciplinary Processes
Please refer to the Employee Handbook for more information

The school is committed to reporting promptly to the DBS any person (whether employed, contracted, a volunteer or student) and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child.

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report when required constitutes an offence. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation. Proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources.

The school is under a duty to consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in *Teacher misconduct: the prohibition of*

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teachers (October 2022). Further guidance is published on the Teaching Regulation Agency website.

In the event of an allegation that meets the criteria above, the Head (or Chair of Governors where the Head is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the Designated Officer at the Local Authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the Designated Officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the Designated Officer as soon as practicably possible after contacting the police);
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the Designated Officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies;
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate;
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within one working day, and the individual will be given a named contact at the school and their contact details;
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the Designated Officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation;
- If it is decided that further action is needed, take steps as agreed with the Designated Officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate;
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate;
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing.

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Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice;

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence);
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point

Disciplinary proceedings are not subject to the same burden of proof as legal proceedings. Lack of conviction or charge within itself is not an adequate defence against an allegation within the work setting or an acceptable reason for the School not to pursue an internal disciplinary investigation. There may be elements of an allegation which clearly suggest a breach of expected or appropriate standards of behaviour or propriety, or which pose a risk to the welfare of children and young people; even where no criminal activity is identified. The internal investigation may determine that disciplinary action is not necessary and may exonerate the individual concerned.

As the employer, the School must also consider the duty of care to their employee; this requires ensuring the employee is treated fairly and reasonably about the process to be followed.

Consideration should be given to:

- The context in which the allegation occurred and whether this provides further insight which may mitigate risk;
- The type of activity the individual is expected to undertake;
- The level of access to children this provides;
- The indicative risks presented by the nature of the allegation; and
- What if any mechanisms exist to reduce or manage the risk.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the Local Authority's Designated Officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the Designated Officer whether

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to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the Designated Officer whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Head, or other appropriate person in the case of an allegation against the Head, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- **Who needs to know about the allegation and what information can be shared;**
- **How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;**
- **What, if any, information can be reasonably given to the wider community to reduce speculation;**
- **How to manage press interest if, and when, it arises.**

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- **A clear and comprehensive summary of the allegation;**
- **Details of how the allegation was followed up and resolved;**
- **Notes of any action taken and decisions reached (and justification for these, as stated above).**

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If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's Designated Officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- **Issues arising from the decision to suspend the member of staff;**
- **The duration of the suspension;**
- **Whether or not the suspension was justified.**

The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

Role of the Board of Governors

The Governors will be apprised of any investigations. Precise details will not be given in order not to prejudice any possible disciplinary hearing.

Relevant documents:

Part 4 of Keeping Children Safe in Education (September 2026)

Other related policies which are available by request to the Head's PA, hmpa@downside.co.uk or view on the School's website Downside School Policies - Downside School:

1. Disciplinary Policy;
2. Capability Policy;
3. Grievance Policy;
4. Recruitment Policy.

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Useful Publications:

An overview of the framework for managing allegations against people who work with children is set out in Working together to safeguard children (March 2026). This is available electronically.

Keeping children safe in education - GOV.UK
Part 4 deals with allegations of abuse made against teachers and other staff and Part 3 outlines the safer recruitment process.

The South West Child Protection Procedures (Welcome to the South West Child Protection Procedures (trixonline.co.uk) also has useful guidance.

Appendix 3: Specific Safeguarding Issues

Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis or a mental health problem. Staff however, are well placed to observe and know children and they may be able to 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 (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood in terms of mental health, behaviour and education. Staff who have a mental health concern about a child should notify the DSL or DDSLs via MyConcern and make an appointment for the child with the Health Centre for assessment.

The Department for Education and Public Health England advice and guidance:

Preventing and Tackling Bullying
https://www.gov.uk/government/publications/preventing-and-tackling-bullying

Mental Health and Behaviour in Schools
https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2

Promoting children and young people's emotional health and wellbeing
https://www.gov.uk/government/publications/promoting-children-and-young-peoplesemotional-health-and-wellbeing

Looked After Children

The DSL will appoint a designated teacher for every LAC child who will promote the educational achievement of the pupil, co-ordinate the support in school and liaise with the Local Authority.

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Private Fostering

The DSL will notify Somerset Direct of any privately fostered child. The DSL is responsible for ensuring all staff are aware of any private fostering requirements and co-ordinate the appropriate support for the child

Children Missing from Education

A child going missing or absent from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

There are many circumstances where a child may become missing or absent from education, but some children are particularly at risk. These include children who:

- **Are at risk of harm or neglect;**
- **Come from Gypsy, Roma, or Traveller families;**
- **Come from the families of service personnel;**
- **Go missing/absent or run away from education/ home or care;**
- **Are supervised by the youth justice system;**
- **Cease to attend a School;**
- **Come from new migrant families.**

We will follow our procedures for unauthorised absence and for dealing with children who 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 going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

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

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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 may 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. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Child sexual exploitation (CSE)

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Having older boyfriends or girlfriends;
- Suffering from sexually transmitted infections or becoming pregnant;
- Displaying inappropriate sexualised behaviour;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and/or alcohol;
- Going missing for periods of time, or regularly coming home late;
- Regularly missing school or education, or not taking part in education.

Child criminal exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, shoplifting or threatening/committing serious violence to others. Children involved in criminal exploitation often commit crimes themselves. They must be recognised and treated as victim, even if the activity appears to be something they have agreed or consented to. The experience and indicators for CCE may be different for boys and girls. Children who are criminally exploited are also at higher risk of sexual exploitation.

So-called 'honour-based' violence (HBV) 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 HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts 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 HBV, or already having suffered HBV.

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Indicators: There are a range of potential indicators that a child may be at risk of HBV. 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 (pages 59-61 focus on the role of schools) and pages 13-14 of the Multiagency guidelines: Handling case of forced marriage.

Actions: If staff have a concern regarding a child that might be at risk of HBV 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 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see section 7.3)

Female Genital Mutilation (FGM)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place;
- A mother/family member disclosing that FGM has been carried out;
- A family/pupil already being known to social services in relation to other safeguarding issues.

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable;
- Finding it hard to sit still for long periods of time (where this was not a problem previously);
- Spending longer than normal in the bathroom or toilet due to difficulties urinating;
- Having frequent urinary, menstrual or stomach problems;
- Avoiding physical exercise or missing PE;
- Being repeatedly absent from school, or absent for a prolonged period;
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
- Being reluctant to undergo any medical examinations; • Asking for help, but not being explicit about the problem;
- Talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider);

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- FGM being known to be practised in the girl's community or country of origin;
- A parent or family member expressing concern that FGM may be carried out;
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM;
- Having limited level of integration within UK society;
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman";
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period;
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
- Being unexpectedly absent from school;
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- **Speak to the pupil about the concerns in a secure and private place.**
- **Activate the local safeguarding procedures and refer the case to the local authority's Designated Officer;**
- **Seek advice from the Forced Marriage Unit on 020 7008 0151 or** fmu@fco.gov.uk;
- **Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate;**

Preventing radicalisation

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Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children partnership and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- **Refusal to engage with, or becoming abusive to, peers who are different from themselves;**
- **Becoming susceptible to conspiracy theories and feelings of persecution.**
- **Changes in friendship groups and appearance;**
- **Rejecting activities they used to enjoy;**
- **Converting to a new religion;**
- **Isolating themselves from family and friends;**
- **Talking as if from a scripted speech;**
- **An unwillingness or inability to discuss their views;**
- **A sudden disrespectful attitude towards others;**
- **Increased levels of anger;**
- **Increased secretiveness, especially around internet use;**
- **Expressions of sympathy for extremist ideologies and groups, or justification of their actions;**
- **Accessing extremist material online, including on Facebook or Twitter.**
- **Possessing extremist literature;**
- **Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.**

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage

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behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Domestic Abuse

A single 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.

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. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.4 of this policy, including discussing their concerns with the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification on request. Visiting Speaker protocol form is available internally for staff here Speaker protocol.

The Speaker Protocol is available to approved external audiences by contacting the Deputy Heads of School.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or

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organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Contact Parents/Guardians and arrange for collection as soon as possible;
- Pupils will remain in school until an appropriate adult can collect therm.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. As soon as a House Master/Mistress becomes aware of an unexplained absence from lessons or other commitments including meals, prayers or bedtimes, the following procedure should be followed:

- Internal enquiries should be carried out (consulting House Mother, friends, etc.).
- The Head and his deputy should be informed and will discuss whether or not the parents should be informed immediately;
- The police should be contacted in case the pupil has been involved in an accident;
- The parents should be informed and any further move discussed with them;
- The police should again be contacted and local hospitals rung in case they have any knowledge of the missing person.

QUESTIONS TO BE ASKED

1) When was he/she last seen?
2) Who was he/she with?
3) Where might he/she have gone?
4) Has he/she signed out?
5) Is there a School activity that he/she might be on?
6) Has he/she been ill or injured and gone to the House Mother or the Health Centre?
7) What emotional state did he/she appear to be in?
8) Has anything upset him/her recently?
9) Did he/she speak to anyone about leaving?
10) Who are their main friends at School?
11) Does he/she have a mobile phone and what is the number?
12) Does he/she have a girlfriend/boyfriend?
13) Is there any reason to believe he/she might have been abducted? (e.g. family custody dispute; very wealthy/prominent parents)

OTHER ACTION TO CONSIDER TAKING

- Check that he/she is not in the Health Centre;

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- Check their room for indications of how he/she is dressed, where he/she might have gone – check desk and waste paper bins for scribbled notes;
- Ring their mobile (if he/she has one).

POLICE RESPONSE

The Police are more likely to respond if any of the following conditions apply:

- Boy/Girl is under the age of 14;
- Boy/Girl in an emotional or depressed state of mind;
- Unusual behaviour prior to disappearance;
- Boy/Girl needs essential medicine or treatment;
- Suspicion of abduction;
- Suspicion of self-harm/suicide;
- Involvement in a violent confrontation prior to disappearance;
- Previously disappeared and suffered or was exposed to harm whilst missing.

Downside has full regard to the National Minimum Standards for Boarding Schools (May 2026)

In accordance with Standard 8 the School ensures that:

- 8.1 The school should ensure that:
  - arrangements are made to safeguard and promote the welfare of pupils at the school; and
  - such arrangements have regard to any guidance issued by the Secretary of State.
- 8.2 The school should ensure that all staff are aware that safeguarding and promoting the welfare of children is everyone's responsibility throughout the school and the boarding facilities;
- 8.3 It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school's approach to online safety should be reflected in the child protection policy, having regard to the Department's Keeping children safe in education guidance;
- 8.4 Keeping Children safe in education sets out that boarding schools have additional factors to consider with regard to safeguarding. As such it will be important that the boarding school's child protection policy (and/or other policies if appropriate) reflect:
  - the school's policy on sexual relationships between children (and importance of boarders understanding this policy) the school's approach to child-on-child abuse, reflecting the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation.

In accordance with Standard 19 the School ensures that:

- 19.1 Schools operate safer recruitment and adopt recruitment procedures in line with the regulatory requirements 40 and having regard to relevant guidance41 issued by the Secretary of State;

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- 19.2 For all members of staff households who are aged 16 and over (not on the roll of, nor employed by, the school) and who live on the same premises as boarders, an Enhanced certificate with a check of the Children's Barred List must be obtained from the Disclosure and Barring Service (DBS). For all other persons aged 16 and over, not on the roll of, nor employed by the school, who live on the same premises as boarders, an Enhanced certificate with a check of the Children's Barred List must be obtained. The same premises would include, for example, an abbey or teacher housing on the same grounds as the school, requiring the use of the same entry and exit points;
- 19.3 There is a written agreement between the school and any person aged 16 and over not employed by the school but living in the same premises as children (for example, members of staff households). This specifies the terms of their accommodation, guidance and expectations on contact with pupils, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with children. They must be required to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any offence;
- 19.4 All persons visiting boarding accommodation or staff accommodation (e.g. visitors, outside delivery and maintenance personnel) are kept under sufficient staff supervision to prevent them gaining unsupervised access to boarders or their accommodation.

In accordance with Standard 20 the School ensures that:

- 20.1 Any staff member or volunteer employed or volunteering in a position working with boarders has a job description reflecting their duties, receives induction training in boarding when newly appointed, and receives regular reviews of their boarding practice, with opportunities for training and continual professional development in boarding;
- 20.2 Any role of spouses, partners and/or other adult members of staff households within boarding houses is made clear;
- 20.3 The staff supervising boarders outside teaching time are sufficient in number, training and experience for the age, number and individual needs of boarders, and the locations and activities involved;
- 20.4 Boarders are at all times under the responsibility of an identified member of staff who is suitably qualified and experienced. There is continuity of staff, as far as is reasonably possible, such that boarders' relationships with staff are not overly disrupted;
- 20.5 Staff know the whereabouts of boarders (or know how to find their whereabouts) in their charge at all times;
- 20.6 Staff working within the school know and implement the school's policy, and any local protocols, in relation to boarders going missing and understand their role in implementing that policy. Staff actively search for boarders who are missing, including working with police where appropriate;
- 20.7 Schools should ensure that they have a suitable number of staff (and at least one) sleeping or on duty in each building, who is responsible for the boarders and available to meet boarders' needs during the night;

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- 20.8 Boarders are able to contact a member of staff easily in each building at night and know how to do this;
- 20.9 Suitable accommodation (consisting of accommodation in which meals may be taken, living accommodation, and sleeping accommodation) and suitable toilet and washing facilities are provided for residential staff. This accommodation is appropriately separated from the accommodation and facilities provided for boarding pupils;
- 20.10 No boarders have access to staff residential accommodation, other than in exceptional circumstances. Where this occurs a one-to-one situation should be avoided with boarders with another adult always present. There is no inappropriate favouritism or inappropriate one-to-one contact between staff and boarders.

Appendix 4: Safeguarding and ICT

This policy should be read in conjunction with the following School policies:

- Acceptable Use Policy

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation- technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material;
- Contact: being subjected to harmful online interaction with other users;
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.

Filters and monitoring

The Governing Body will consider their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the governing Body will do all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, the Governing Body will ensure their school has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The Governing body will consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks. Keeping children safe online includes when they are online at home. The governors have a dedicated ICT governor to oversee the schools policies and training for both staff and pupils via INSET training and the PSHE and computing lessons.

Whilst filtering and monitoring are an important part of the online safety picture for schools to consider, it is only one part. The Governors consider a whole school approach to online safety. This includes a clear policy on the use of mobile technology in the school. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and the

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school takes account of this, giving clear guidance on appropriate use and taking robust action when that guidance is not followed.

The governing body ensures that appropriate filters and monitoring systems are in place; being careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Guidance is taken from the website of the UK Safer Internet Centre:

- appropriate filtering and monitoring https://www.saferinternet.org.uk/;
- National Education Network (NEN) http://www.nen.gov.uk.

Staff Training

Online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach. Protecting young people in the online world means thinking beyond the School environment. As well as the computer to access the Internet, now many mobile phones and games consoles offer broadband connections. Pupils may be working online in school, at home, in an Internet café or using free WiFi access points. Increasingly pupils will have access to personal devices not covered by network protection and therefore the emphasis needs to be on educating all users as to the risks involved and their obligation to act responsibly while online.

Safeguarding pupils in both the real and virtual world is everyone's responsibility and all staff should be aware of this policy and how to respond to e-safety incidents.

All pupils and staff should be made aware of the School's Acceptable Use Policy and what to do if they have any ICT safeguarding concerns. Harassment, grooming of another person using technology, breaching their right to privacy, pose a serious threat to physical and emotional safety, and may have legal consequences.

Pupils are made aware of the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. Internet safety is embedded in the SMSC (PSHE) programme. In addition, the mandatory RSE (Relationship and Sex Education) curriculum gives further information and guidance to our young people on how to remain safe.

Information and support

There is a wealth of information available to support schools to keep children safe online. The following is not exhaustive but should provide a useful starting point:

www.thinkuknow.co.uk www.disrespectnobody.co.uk www.saferinternet.org.uk
www.internetmatters.org www.pshe-association.org.uk
www.educateagainsthate.com www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

- DfE advice for schools: teaching online safety in schools;

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- UK Council for Internet Safety (UKCIS)37 guidance: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people;
- The UKCIS external visitors guidance will help schools and to ensure the maximum impact of any online safety sessions delivered by external visitors;
- National Crime Agency's CEOP education programme: Thinkuknow;
- Public Health England: Every Mind Matters;
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

If staff or pupils discover unsuitable websites, this should be immediately reported to the Designated Safeguarding Lead (DSL) who, in liaison with the ICT Network Manager for the School, will consider a referral to the Internet Watch Foundation (IWF) and the Police. Illegal material within the school's network or found on any device belonging to a member of staff or pupil is a very serious situation and must always be reported to the Police. Our school ensures processes are in place to minimise the risk of pupils or staff gaining access to inappropriate materials, through supervision and monitoring. Any incident that involves adult access to illegal or inappropriate material on the school premises will be dealt with by the school's disciplinary policy.

What to do in the event of discovery of illegal material

- Seek immediate and specific advice from the DSL who will consult with the ICT coordinator, the Head and the Police;
- Prevent any further physical access to the device until the correct advice is gained.
- **Unless absolutely necessary, DO NOT remove the power from a working PC and definitely DO NOT start a PC if it is already turned off;**
- Consider if it is necessary to prevent remote access to the device;
- If you believe that a member of staff or pupil who has left the site, could remove or damage evidence on the device remotely, unplug **ONLY** the network cable from the back of the device to prevent this access from taking place;
- If the PC is already turned off and it is no longer realistically possible to prevent further physical access to the device (i.e. lack of supervision, high levels of access or an unoccupied location) **disconnect the power at the base unit (not the wall)** and remove the battery from a laptop. Store this device securely in a location where no one else can gain access to it and make a note of the date, time and name of the individual who performed this action.

Under no circumstances should the ICT co-ordinator, Network Manager or Head attempt to conduct an investigation of their own or bring in an outside expert to do so as this may compromise the evidence if a legal case were to result. In some cases this may constitute a criminal offence in itself.

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Combating Cyber-bullying

Cyber-bullying can be defined as 'the use of Information and Communications Technology (ICT), particularly mobile phones and the internet, deliberately to upset someone else'. It can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target. However, it differs in several significant ways from other kinds of bullying: the invasion of home and personal space; the difficulty in controlling electronically circulated messages, the size of the audience, perceived anonymity, and even the profile of the person doing the bullying and their target.

Cyber-bullying takes different forms: threats and intimidation, harassment or 'cyber-stalking' (e.g. repeatedly sending unwanted texts or instant messages), vilification / defamation; exclusion or peer rejection, impersonation, unauthorised publication of private information or images and manipulation.

Some cyber-bullying is clearly deliberate and aggressive, but it is important to recognise that some incidents of cyber-bullying are known to be unintentional and the result of simply not thinking about the consequences. What may be sent as a joke may not be received as one, and indeed the distance that technology allows in communication means the sender may not see the impact of the message on the receiver. There is also less opportunity for either party to resolve any misunderstanding or to feel empathy. It is important that pupils are made aware of the effects of their actions.

In cyber-bullying, bystanders can easily become perpetrators, e.g. by passing on or showing to others images designed to humiliate, or by taking part in online polls or discussion groups. They may not recognise themselves as participating in bullying, but their involvement compounds the misery for the person targeted. It is recommended that anti-bullying policies refer to those 'bystanders' — better termed 'accessories' in this context — who actively support cyber-bullying and set out sanctions for this behaviour. It is important that pupils are aware that their actions have severe and distressing consequences, and that participating in such activity will not be tolerated.

There are particular features of cyber-bullying that differ from other forms of bullying which need to be recognised and taken into account when determining how to respond effectively. The key differences are:

- **Impact** — the scale and scope of cyber-bullying can be greater than other forms of bullying;
- **Targets and perpetrators** — the people involved may have a different profile to traditional bullies and their targets;
- **Location** — the 24/7 and any-place nature of cyber-bullying;
- **Anonymity** — the person being bullied will not always know who is attacking them;
- **Motivation** — some pupils may not be aware that what they are doing is bullying;
- **Evidence** — unlike other forms of bullying, the target of the bullying will have evidence of its occurrence.

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Sexting: Consensual and non-consensual sharing of nude and semi-nude images and/or Videos (also known as sexting or youth produced sexual imagery).

Those involved may face charges of producing, possessing, and/or distributing child pornography.

Legal consequences are not the only outcomes that children face. They may face social repercussions, such as being judged or excluded by their peers, communities, and families. Young people that send the images may become targets of mean comments, rumours, and harassment. Furthermore, the image may follow them forever, damaging academic, social, and employment opportunities.

Sexting may also profoundly affect the emotional and psychological development of a child. Trust is broken when an image is forwarded without the creator's consent. Once an image is spread online, it is extremely difficult to remove and can potentially circulate forever; youth who engage in sexting risk recurring embarrassment and victimization. These pictures can even find their way into the hands of those individuals who prey on children and collect child pornography. This kind of exploitation can be psychologically devastating.

Prevention

We seek to instil values in all members of the School, which should, ideally, preclude all bullying. These are reinforced by a PSHE programme which requires tutors at all levels of the School to spend time talking to their groups about cyber-bullying and its effects and consequences. In essence, these seek to inculcate respect for others, their property and their individuality. We hope these values underpin ordinary curricular lessons too.

It is crucial to the School's success in dealing with cyber-bullying that all members of the community are made aware that it is unacceptable and should not be tolerated. It is the responsibility of all members of the community to take action if they are aware of it happening. To remain silent is to condone the action of the bully.

Process

Information is crucial to dealing with the problem. Those who feel that they are being bullied, or who are witnesses to what they believe is bullying/cyber-bullying, should always tell a member of staff.

Advice, support and counselling will be offered to all parties involved, and, if necessary, their parents. While recognising that both victim and bully need help, we do not adopt a 'no blame' position.

1) If a pupil receives an abusive e-mail or text, they should report the matter to a member of staff as soon as possible. A copy of the e-mail with full headers, plus dates and times should be saved. Staff will investigate all complaints of abuse and take action accordingly.

2) Depending on the nature of the allegation, the case will be taken up either by the tutor, house staff, a deputy head, Designated Safeguarding Lead or a combination

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of these people. As a rough guide, the more serious the allegation, the more likely it is to involve senior staff and/or the Police.

3) Interviews will be conducted fairly, giving all sides the opportunity to state their case, so as to establish the truth in what seldom turn out to be straightforward issues. In all cases, pupils will be warned not to do or say anything that may prejudice their position vis-à-vis the pupil who has been bullied. (No revenge/stirring up support among friends, no taking the law into their own hands.)

4) Except for the most straightforward cases, in which truth has been established and the matter has been resolved swiftly, an interview will be conducted; a pupil would be invited to bring a friend or member of staff to support them in any such interview. This will enable a record to be kept of the interview, and what is said, to be corroborated. Notes, both rough copies and, where necessary, a brief summary and copies of any letters sent to parents will be put on files with cross referencing where appropriate.

5) Letters written to parents will detail the nature of the offence and any sanctions imposed, and will set out what improvements the School expects to be made in behaviour as well as the consequences of failure to improve. Recommendations may be made about visits to the Medical Centre and counselling for everyone involved.

6) At the conclusion of the investigation, if appropriate, one of the members of staff involved will contact parents of all pupils directly involved and inform them of action taken. The identity of "informers" and pupils other than the son or daughter of the parent will not be disclosed.

Sanctions

In practice, the sanctions applied range from a verbal warning or a ban on use of the School's computer network to a temporary or permanent exclusion, depending on the gravity of the offence and the pupil's previous record with reference to bullying / cyber-bullying. In the most severe cases, it can result in criminal prosecution.

The aim of sanctions is to:

- Help the person harmed to feel safe again and be assured that the bullying will stop;
- Hold the perpetrator to account, getting them to recognise the harm caused and deter them from repeating the behaviour;
- Demonstrate to the school community that cyber-bullying is unacceptable and that the school has effective ways of dealing with it, so deterring others from behaving similarly.

When cyber-bullying is investigated, reference will be made to the Acceptable Use Policy (AUP); sanctions for breaches are set out in the AUP and the 'Procedure for dealing with Bullying/Cyber-bullying incidents'. Technology-specific sanctions for pupils engaged in cyberbullying behaviour could include limiting Internet access for a period of time or removing

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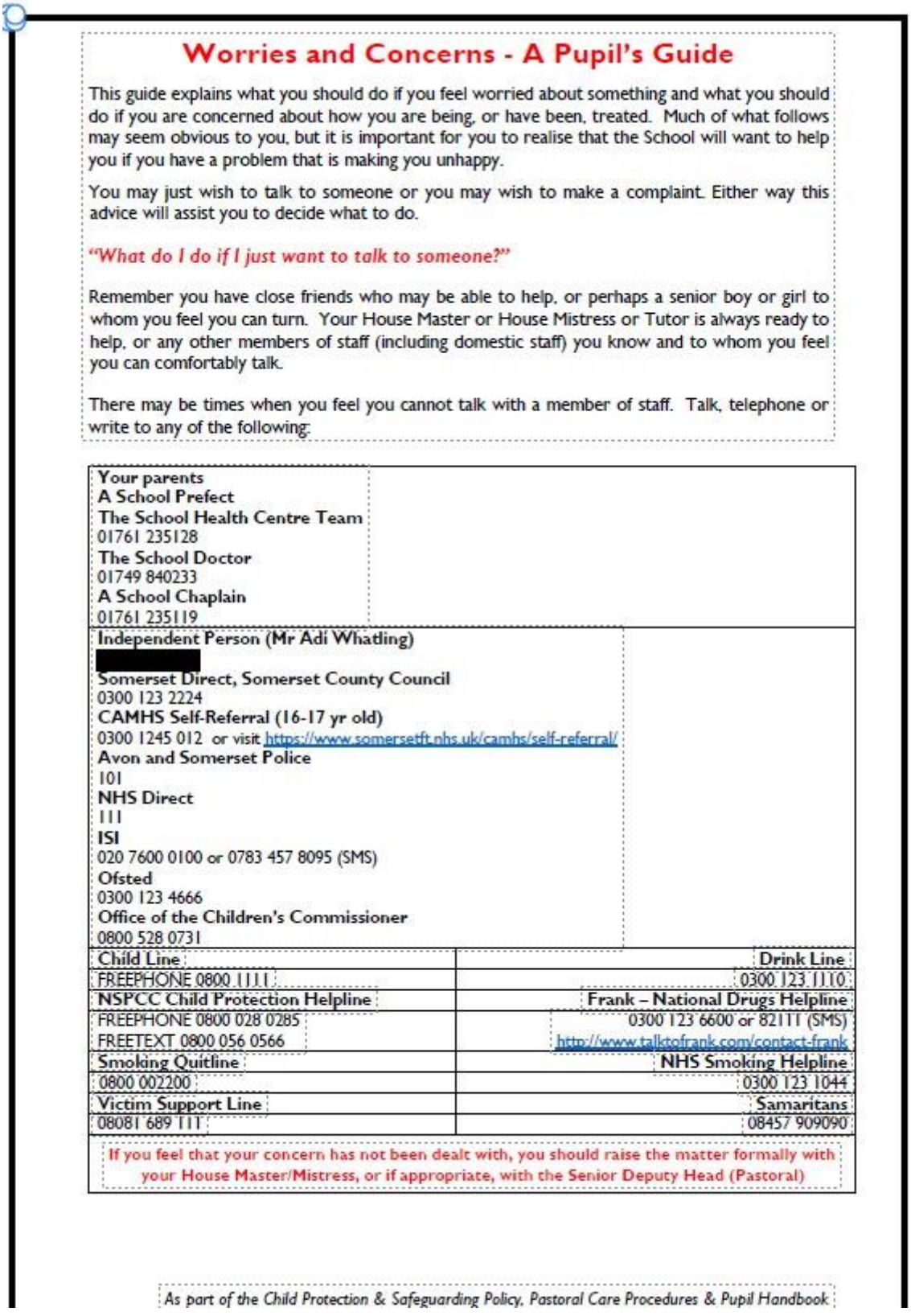
the right to bring a mobile phone into school (although issues of child safety will be considered in relation to the latter).

Cyber-bullying will have an impact on the education and wellbeing of the person being bullied, and the physical location of the bully at the time of their action is irrelevant in this. Schools now have broad new powers to discipline and regulate the behaviour of pupils, even when they are off the school site. These are set out in the Education and Inspections Act 2006. Misconduct of any kind outside of school will be amenable to school discipline if the welfare of another pupil or the culture or reputation of the school are placed at risk.

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Appendix 5: Worries and Concerns - A Pupil's Guide

The following notice is included in the Pupil Handbook and displayed in all Houses:



Worries and Concerns - A Pupil's Guide

This guide explains what you should do if you feel worried about something and what you should do if you are concerned about how you are being, or have been, treated. Much of what follows may seem obvious to you, but it is important for you to realise that the School will want to help you if you have a problem that is making you unhappy.

You may just wish to talk to someone or you may wish to make a complaint. Either way this advice will assist you to decide what to do.

"What do I do if I just want to talk to someone?"

Remember you have close friends who may be able to help, or perhaps a senior boy or girl to whom you feel you can turn. Your House Master or House Mistress or Tutor is always ready to help, or any other members of staff (including domestic staff) you know and to whom you feel you can comfortably talk.

There may be times when you feel you cannot talk with a member of staff. Talk, telephone or write to any of the following:

Your parents
A School Prefect
The School Health Centre Team
01761 235128
The School Doctor
01749 840233
A School Chaplain
01761 235119

Independent Person (Mr Adi Whatling)
[redacted]
Somerset Direct, Somerset County Council
0300 123 2224
CAMHS Self-Referral (16-17 yr old)
0300 1245 012 or visit https://www.somersetft.nhs.uk/camhs/self-referral/
Avon and Somerset Police
101
NHS Direct
111
ISI
020 7600 0100 or 0783 457 8095 (SMS)
Ofsted
0300 123 4666
Office of the Children's Commissioner
0800 528 0731

Child Line	**Drink Line**
FREEPHONE 0800 1111	0300 123 1110
NSPCC Child Protection Helpline	**Frank – National Drugs Helpline**
FREEPHONE 0800 028 0285 FREETEXT 0800 056 0566	0300 123 6600 or 82111 (SMS) http://www.talktofrank.com/contact-frank
Smoking Quitline	**NHS Smoking Helpline**
0800 002200	0300 123 1044
Victim Support Line	**Samaritans**
08081 689 111	08457 909090

If you feel that your concern has not been dealt with, you should raise the matter formally with your House Master/Mistress, or if appropriate, with the Senior Deputy Head (Pastoral)

As part of the Child Protection & Safeguarding Policy, Pastoral Care Procedures & Pupil Handbook

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Appendix 6: Procedures for Visitors

Downside takes the following steps to ensure that its premises are secure:

1. All Staff and Volunteers (recruited in accordance with Safer Recruitment Procedures) wear identity badges at all times.*[1];
2. 'Visitors' includes all persons arriving on the School site, who are not trustees, governors, members of staff, volunteers (for whom there are separate arrangements), or pupils of the School;
3. All Visitors must report to Reception in the Old House of the Main Quad.*[2] (Reception is staffed on weekdays between 9am and 5pm and on Saturdays between 9.00am and 12.00pm);
4. Visitors must display the visitor's badge given and must sign the visitors' book in Reception;
5. Visitor's badges must be returned to Reception just before departure;
6. Visitors must be accompanied by a member of staff at all times.*[3]

Boarding Houses:

The Boarding Houses are normally closed to visitors. However, parents visiting their own children in their Boarding House may do so after checking in with a member of the House staff, and signing the House visitors' book.

Parents are advised to contact the House to inform the House staff of the time they are arriving.

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*[1] Coloured lanyards are as follows:

CONTRACTOR	**Yellow**
GOVERNOR	**White**
RESIDENT	**Blue**
STAFF	**Black**
VISITOR	**Red**
VOLUNTEER	**Purple**

*[2] Exceptions:

1) Parents visiting their children in Caverel, Barlow or Isabella Houses, and who are not entering the Main School buildings. Parents visiting these Houses must report directly on arrival to the House staff on duty in the House at the time.

2) Parents visiting their children outside the hours when reception is staffed. Parents are advised to contact the House to inform the House staff of the time they are arriving.

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3) Visitors to the Sports Hall or Swimming Pool for an external club or county event.

- Visitors should make their way to the Sports Centre/Swimming Pool via the path from the Main School Quad;
- Sign the register on arrival at the Sports Centre/Swimming Pool;
- Remain in the area designated for the activity you are attending or, if by agreement with the activity organiser you are leaving a child at the activity, you must leave the site and return to pick up the child at the agreed time.

*[3] The exception to this is prospective parent visits who are given a school tour by a senior pupil (Sixth Form). These pupils are briefed by the admissions team. During examination periods or under special circumstances junior pupils may be asked to take a tour. They will normally be in pairs on these occasions.

It is also recognised that there are certain times when parents and other visitors will enter the School without having to wear badges e.g. Match teas, concerts, plays and other such events. On these occasions visitors should remain in the area in which the event is taking place.

It is also important to remember that at the start and end of term and at exeats parents/guardians can often be present on site without having to sign in and wear a badge, as they drop off or pick up pupils. Staff and volunteers are asked to be sensitive and polite in questioning those without badges to ascertain who they are and their reason for being on the School site. Concerns should be reported to a member of the SLT.

Pupils are advised never to pass on the school or house entry codes to visitors and, whilst being at all times courteous, they are asked not to allow admittance to people who do not have a school identity badge or are unaccompanied. They should direct such visitors to reception or to a member of staff. If they are at all concerned about an unidentified stranger on the school site, they should report the matter to a member of staff immediately.

Protocol for visitors to the monastery guest wing

Though they are geographically next to each other, the School and the Monastery occupy separate areas and are distinct from one another. Visitors may not enter any part of the School or School grounds.

Visitors to the monastery will only be allowed on School premises if they have legitimate business with the School and comply with the School's visitor protocol.

Appendix 7: Reporting non-recent abuse

It is never too late to report abuse.

Adults often report non-recent abuse to stop the offender abusing other children. Some feel that reporting gives them a greater sense of closure.

Deciding on when or whether to report can be very difficult. Nobody should ever feel forced to take any action with which they do not feel comfortable.

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Those who do decide to report should be reassured that they will be supported through the process.

The NSPCC has helpful information and advice regarding non-recent abuse:
https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/non-recent-abuse/

Procedure on receiving a disclosure of non-recent abuse

When an adult discloses childhood abuse, the person receiving the information must record the discussion in detail. If possible, they should establish if the adult has any knowledge of the alleged abuser's recent or current whereabouts and contact with children.

In view of the potential continuing risk the alleged abuser may pose to children, the matter must be referred promptly to the Designated Officer at the Local Authority (formerly named LADO). The person receiving the information must therefore inform the Head, in line with Appendix 2 of the Child Protection Policy (Dealing with Allegations). The Head will discuss the matter with the DSL who will make the referral to the Designated Officer.

(*N.B. If the abuse involves a monk or member of the clergy the DSL will also contact the Safeguarding Coordinator of the Clifton Diocese. Under these circumstances the Designated Officer and the Clifton Safeguarding Office will share information as required.)

The Designated Officer will require an Allegation Referral Form (ARF) to be completed, seeking sufficient information to develop a chronology, and all records must be dated and the authorship made clear.

If information about the current whereabouts of the alleged abuser has not yet been gathered, the Designated Officer will seek to establish this as a matter of urgency.

Should the School receive a disclosure of non-recent abuse the adult will be asked whether they want a police investigation and must be reassured that the police are able and willing to progress an investigation even for those adults who are vulnerable as a result of mental ill health or learning disabilities.

The School will reassure the adult that, even without their direct involvement, all reasonable efforts will be made to investigate the alleged abuse. The Designated Officer will inform the police at the earliest opportunity and establish if there is any information regarding the alleged abuser's current contact with children, irrespective of the wishes of the victim as to whether a police prosecution should take place.

The Designated Officer will hold a strategy meeting to determine the appropriate sharing of information with other agencies and the appropriate actions required to ensure both the welfare of the person who has made the disclosure and to ensure that the alleged abuser does not pose any risk to children or vulnerable adults.

The school will co-operate fully with any criminal investigation and/or child protection enquiries providing appropriate information and attending meetings as necessary.

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The School will conduct a 'lessons learned' exercise when it is appropriate and certainly when the matter has been concluded so as to improve practice where possible.

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Appendix 8: Additional local procedures

Cases where a child has suffered or is likely to suffer significant harm should be reported immediately to Children's Social Care (**Somerset Direct, Somerset County Council 0300 123 2224)**

Cases where a child is in need of additional support should lead to inter-agency assessment using Somerset processes, including use of the Early Help Assessment (EHA) and ' Team around the Family (TAF) approaches.

Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, there should be no suggestion in the school policy that their consent is required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

(a) Cases where abuse may have been inflicted by parents or carers

- Suspicion or knowledge of abuse must be reported to the Designated Safeguarding Lead or their Deputy who will share such information with the Head and only the relevant House Staff of the pupil concerned on a 'need to know basis';
- Any adult to whom abuse is reported by a pupil has a duty to listen to the pupil, to provide reassurance, and subsequently to record the pupil's statements. They must not press the pupil, ask probing questions or suggest answers. The situation should then be reported and discussed with the Designated Safeguarding Lead (DSL) who will consult with the Head. The online South West Child Protection Procedures must be referred to at all stages;
- Expert medical diagnosis may be required quickly. The DSL, their Deputy or the Head will seek the advice of Children's Social Care.

(b) Cases where abuse may have been inflicted by staff or volunteers (See Appendix 2)

If an allegation is made against a member of staff or volunteer it must be responded to; there is an obvious need to act immediately and with the **utmost discretion**. The informant should be told that the matter will be referred in confidence to the appropriate people. This must be done, and the written record passed on the same day to the Head.

The circumstances should be kept **strictly confidential** until the Head has been able to consult with the Designated Officer to judge whether or not an allegation or concern indicates possible abuse. (It will always be the Somerset Designated Officer because of the geographic location of the School). The School will not undertake its own investigation unless expressly instructed by the Designated Officer.

If it is decided, by the Designated Officer, that an investigation is called for, it is the responsibility of the Designated Officer to arrange a meeting (called a Strategy Meeting) to discuss how the next steps are handled. The strategy meeting is initiated by the Designated Officer referring to Somerset Direct. The strategy meeting would

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normally involve the Police, Children's Social Care, appropriate representatives of the School (normally the DSL but can also include the Head and a member of the Governing Body of the School). The arrangements agreed upon in the Strategy Meeting will include informing the parents and seeking their consent for any immediate medical examination.

The strategy meeting will decide when the member of staff against whom the allegation has been made, should be informed of the allegation and by whom; no discussion should take place about the allegation without the permission of the Designated Officer or the Chair of the Strategy Meeting.

If, at the strategy meeting, it is established that the allegation is not criminal but is still of concern it will be agreed what further action, if any, needs to be taken. At the conclusion of the investigation, if criminal proceedings don't ensue, there is a range of possible sanctions available to the School including, where the circumstances warrant it, dismissal. These decisions will be taken by the School in conjunction with the School's legal advisers and human resources advisers.

The strategy meeting will also recommend to the employer whether the member of staff can remain on the School site or not, pending further investigation. The School will be guided by the statutory agencies in deciding whether suspension/leave of absence is implemented. If the Police/Children's Social Care decide to take the case further and the allegation is against a member of staff, it is reasonable to ask the Police to give some indication of their timescales. The Designated Officer can also advise in terms of process.

There is understandable concern amongst many teachers that careers may be irreparably damaged by flimsy or malicious allegations by children. This is actually extremely rare, though some incidents do end up only as "unproven" one way or the other which is generally unsatisfactory. It is always better for a school to anticipate possible risks and to seek to prevent all reasonable risk of misunderstandings and false allegations. Proper policy and procedures are also likely to deter any individual seeking to use the School as a basis for inappropriate relationships with pupils; the staff "Code of Conduct" may be helpful. This will help staff to know what behaviours are generally considered to be inconsistent with their professional status. Infringements should then be subject to disciplinary procedures as required.

Cases where abuse may have been inflicted by the Head, a governor or a Trustee of the School (See Appendix 2)

If an allegation or complaint is made against the Head, a governor or a trustee, the person receiving the allegation will immediately inform the Chair of Governors, John Ludlow (jludlow@downside.co.uk, 07808 094 542) without first notifying the Head. The allegation will be reported to the Designated Officer and the Diocesan Safeguarding Authority, removing the potential of any actual or perceived conflict of interest. If an allegation is made against the Chair of Governors it will be referred direct to the Designated Officer at the Local Authority via Somerset Direct 0300 123 2224

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(c) Cases where abuse may have been inflicted by a pupil or pupils (child-on-child)

The DSL will seek advice, using the Family Front Door (DSL Consultation line) (**0300 123 3078**), as appropriate, regarding issues of child on child abuse, having consulted the thresholds set by the LSCP. (Child Exploitation Screening Tool - Somerset Safeguarding Children Partnership . If there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm inflicted by one or more pupils this will be referred immediately to Children's Social Care or police as a child protection concern. The report should be made to Somerset Direct on **0300 123 2224.** Both the harmed and the harmer will be treated as being 'at risk'.

Staff must recognise that children are capable of abusing their peers and should have regard to and ensure compliance with the School's Pupil Behaviour Policy and AntiBullying Policy, which contains an up to date definition of what constitutes bullying. The advice outlined for practitioners in: What to do if you're worried a child is being abused will be followed and the School will ensure that there is effective and appropriate information sharing with any agencies or other professionals involved. (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

Child on child abuse can occur both inside and outside of school and online. Child on child abuse can manifest itself in many ways and many different forms child on child abuse are possible, but staff must recognise that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Victims of child on child abuse will receive support in accordance with the procedures described in the AntiBullying Policy. It should be recognised that sexualised abuse, including verbal abuse, by peers is a potential safeguarding issue.

The Department for Education provides searching screening and confiscation advice https://www.gov.uk/government/publications/searching-screening-and-confiscationfor schools. Child Exploitation Online Protection Centre (CEOP) has recently updated their sexting guidance which has been communicated by email to all staff and distributed in paper form to each of the Boarding Houses and the Staff Common Room. It can be found via the following link: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB__1_.PDF

There are different gender issues when dealing with child on child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges.

A pupil or pupils against whom an allegation of abuse or assault has been made may be suspended from the School during the investigation and the School's Behaviour Policy will apply. A thorough risk-assessment of the situation will be carried out and as risk-based decision will be made. The School will take advice from Children's Social Care (CSC) or the Local Safeguarding Children Partnership (LSCP) on the handling of such allegations and will take all appropriate action to ensure the safety and welfare of

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all pupils involved including the pupil or pupils accused of abuse, ensuring they receive the necessary support. Decisions arising might include, for example, whether the accused pupil should be removed from the School for a period, or from certain classes, whether sleeping arrangements should be changed for boarders, whether contact with certain individuals be prevented or supervised, the availability of counselling, the adequacy of arrangements for listening to children etc. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of CSC or the LSCP, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation.

*Where there is a safeguarding concern the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The School ensures that children are able to express their views and give feedback. Ultimately the School's systems and processes operate with the **best** interests of the child at their heart.

There will be good record keeping of conversations, meetings and communications relating to any potential or actual cases of child-on-child abuse.

(d) Complaint or Allegation?

It is important to draw a distinction between complaints and allegations against staff. Complaints are made about a process. Allegations are made about behaviour. Concerns relating to behaviour are therefore categorised as allegations.

Any allegation against a member of staff or volunteer which involves the possibility of physical, emotional or sexual abuse will ***always*** be discussed with the Designated Officer and their advice taken. If the matter is a child protection concern, an investigation will be carried out by Children's Social Care and the Police, as happens with any other referral. The DSL, the Head and Governors **must not** carry out investigations themselves in these circumstances. They will be invited to a Strategy Meeting at a very early stage**.**

The allegation and the outcome of the strategy meeting, subject again to legal advice, should also be reported to the Charity Commission.

Decisions about suspension and the use of disciplinary procedures are for the Head and Governors alone, but action may need to be co-ordinated where there is a wider investigation involving Children's Social Care and/or the Police.

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The role of the DSL and DDSLs

The DSL or DDSL will be available via email or phone during term time and will triage MyConcern and make referrals to SSCP or relevant external agencies where necessary. The DSL will keep a record of the most vulnerable pupils and make arrangements for support.

Raising a concern

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the child protection policy.

Mental and emotional wellbeing

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of pupils and their parents. Teachers should be aware of this in setting expectations of pupils' work where they are at home.
Mental health issues can bring about changes in a young person's behaviour or emotional state which can be displayed in a range of different ways, and that can be an indication of an underlying problem.
Early intervention to identify issues and provide effective support is crucial. The school role in supporting and promoting mental health and wellbeing can be summarised as:

- Prevention: creating a safe environment for remote learning, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental wellbeing and maintaining, as far as possible, the school community through tutoring, *Lectio divina* and teaching
- Identification: recognising emerging issues as early and accurately as possible;
- Early support: helping pupils to access evidence based early support and interventions; and
- Access to specialist support: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

The DSL will liaise with the Head of Nursing Care to provide appropriate support for vulnerable pupils and their parents and/or guardians, where possible. This may be in the form of signposting to relevant agencies, the GP or the Independent Person.

Keeping children safe online

Pupils have very clear reporting routes in place so they can raise any concerns whilst online. They can report a concern directly to the DSL or the DDSLs, email a member of school staff, report using Pupil Voice or contact the Independent Person. In addition, the school will also signpost children to age appropriate practical support from the likes of:

- Childline - for support;
- UK Safer Internet Centre - to report and remove harmful online content; • CEOP - for advice on making a report about online abuse.

Online teaching and learning

The starting point for online teaching and learning are the same principles as set out in the school's Staff Code of Conduct. The School will inform parents, staff and pupils of the approved platforms for teaching and learning. Pupils will be informed, in advance, of live

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meetings, audio or visual, and a record will be kept of attendees. School email accounts will be used for all communications between staff and pupils.

Safer Recruitment

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. If the school recruits new staff, it will continue to follow the relevant safer recruitment processes, including, as appropriate, relevant sections in part 3 of KCSIE.

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Appendix 9- Children who are lesbian, gay, bisexual, or gender questioning (LGBTQIA+)

The fact that a child or a young person may be LGBTQIA+ or gender questioning is not in itself an inherent risk factor for harm. However, children who are LGBTQIA+ or gender questioning can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+.

Risks can be compounded where children who are LGBTQIA+ or gender questioning lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQIA+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

There has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

Schools should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Members of staff should not adopt any changes relating to social transition unless a decision has been made by a school or college and a child's parents or carers have been involved as set out in this guidance.
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