



BURGESS HILL
— GIRLS —

Safeguarding Policy – Whole School	7a
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Responsible for Initiating Review of Policy	Governor with oversight. DSL and Deputy DSLs
Committee to Review	Senior Leadership Team
Last Review Date	August 2022
Review Period	Annual (or when required)
Approved by (Committee and Date)	Senior Leadership Team September 2022
Approved by Board of Governors	Approved - Welfare and Boarding Sub-Committee at the first Meeting each September
Effective Date of Policy	September 2022
Next Review Date	August 2023
Related Policies	10a Anti-bullying 9a Behaviour Policy 11a Health and Safety 7h Sex and Relationship Education Policy 7h(i) Sex and Relationships – Preparatory School 7i Confidentiality Policy 7j Restraint Policy Staff Handbooks - Guidance on Staff Pupil Relationships 7e Staff Code of Conduct 32c ICT Acceptable Use Policy Staff

	<p>32d ICT Acceptable Use Policy Pupils</p> <p>32e Use of Social Networking Sites</p> <p>32f Use of Email and the Internet at Work Policy</p> <p>Safeguarding code of conduct for visitors, contractors.</p> <p>7b Whistleblowing Policy</p> <p>18a Safer Recruitment Policy</p> <p>Visiting Speaker Policy</p> <p>11g Use of Mobile Phones by Staff</p>
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- 1.1 Introduction and statement of intent

Objectives and statement of intent

This Policy will follow the procedures set out by the West Sussex Safeguarding Children Partnership (www.westsussexscp.org.uk) and take account of guidance issued by the Department for Education. Any deficiencies or weaknesses in child protection arrangements, identified by whatever means, will be remedied without delay. This policy should be read in conjunction with Keeping Children Safe in Education 2022 (KCSIE) part1 and annex A.

The Policy identifies arrangements made by Burgess Hill Girls to safeguard and promote the welfare of its pupils; and such arrangements have regard to any guidance issued by the Secretary of State. The Governing Body takes strategic leadership responsibility for the school's safeguarding arrangements and will comply with its duties under legislation. The Governing Body will ensure that policies, procedures and training are effective and comply with the law at all times.

All governors and staff believe that:

- all pupils, regardless of age, special needs or disability, racial/cultural heritage, religious belief, gender or sexual orientation have the right to be protected from all types of harm and abuse.

- Burgess Hill Girls provides a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

We recognise that:

- Preventing and reducing harm is at the heart of safeguarding.
- all governors and adults, including temporary staff and volunteers, have a full and active part to play in protecting our pupils from harm and that the child's welfare and best interests are our paramount concern.
- safeguarding covers much more than child protection and so this policy will operate in conjunction with other related policies and procedures. As well as protecting children from harm, 'safeguarding' widens the responsibility to preventing harm and promoting the well-being of children: protecting children from maltreatment; preventing the impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

We also recognise the importance of:

- when there is a safeguarding concern, ensuring that the best interests of the child are paramount and that the child's wishes and feelings are taken into account.
- ensuring that systems in place are promoted, easily understood and accessible to all children.
- early intervention and a culture of listening to the child to ensure that issues are identified as early as possible and that children receive the right help at the right time to address risks and prevent issues escalating.
- acting on and referring the early signs of abuse and neglect
- keeping clear records
- listening to the views of the child
- reassessing concerns when situations do not improve
- sharing information quickly
- challenging inaction

1.2 References and guidance documents

The Policy has been developed in accordance with the principles established by the Children Act 1989 and 2004, the Education Act 2011, Section 175 of the Education Act 2002, The Education (Independent School Standards) Regulations 2014, The National Minimum Standards for Boarding September 2022, and has regard to:

Keeping Children Safe in Education (September 2022) (KCSIE)

KCSIE incorporates the additional statutory guidance, *Disqualification under the Childcare Act 2006*

KCSIE also refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused – advice for practitioners* (March 2015)

KCSIE also refers to *When to Call the Police*, non-statutory guidance from the National Police Chiefs' Council.

Non-statutory interim supplements to KCSIE: *Coronavirus (COVID-19): safeguarding in schools, colleges and other providers (2020 subject to DfE updates)* and *Safeguarding and remote education during coronavirus (COVID-19)* See Appendix B.

Working Together to Safeguard Children (September 2018, updated 1 July 2022) (WT)

WT refers to the non-statutory advice: *Information sharing* (2018)

Sexual violence and sexual harassment between children in schools and colleges (2018)

Prevent Duty Guidance: for England and Wales (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:

The Prevent duty: Departmental advice for schools and childminders (June 2015)

The use of social media for on-line radicalisation (July 2015)

In addition, policy and procedure at Burgess Hill Girls is informed by:

Sussex Child Protection & Safeguarding <https://sussexchildprotection.procedures.org.uk/>

1.3 Key personnel and contacts

- Mrs Victoria Watt is The Governor responsible for Safeguarding contactable through the School on 01444 241050 or via the Bursar at bursar@burgesshillgirls.com
- Mrs Heather Cavanagh, The Head of the Preparatory School/Deputy Head of School, is the Designated Whole School Safeguarding Lead (DSL) heather.cavanagh@burgesshillgirls.com; 01444 241050 (mobile number issued to staff for 'out of hours')
- Miss Nicola Donson, The Assistant Head Pastoral and Boarding, Designated Deputy Safeguarding Lead (DDSL) nicola.donson@burgesshillgirls.com; 01444 241050 (mobile number- 'issued to staff for 'out of hours')
- Mr Iain Regan-Smith. The Assistant Head Sixth Form, Designated Deputy Safeguarding Lead (DDSL)
- Mrs Suzanne Roberts. Nursery Manager, Designated Deputy Safeguarding Lead (DDSL)
- Mrs Nicole Parker, Deputy Head of Nursery holds a DSL qualification.
- West Sussex County Council – Local Authority Designated Officer (LADO) 03302 222-6450 Mob: 07841 308548 LADO@westsussex.gov.uk

- The Multi-Agency Safeguarding Hub (MASH) Single 'front door' for safeguarding concerns in West Sussex:
E-mail MASH@westsussex.gcsx.gov.uk
01403 229 900
0330 222 6664 (out of hours) Mobile - 07711769657
- East Sussex contact details are as follows:
Email 0-19.SPOA@eastsussex.gov.uk
01323 464222
01273 335905/6
- Ofsted – 0300 123 1231, National Business Unit, OFSTED, Piccadilly Gate, Store Street, Manchester M1 2WD
- Social Services: 01243 642 555
- Police: 101
- Teacher Referral Agency
<https://www.gov.uk/guidance/teacher-misconduct-referring-a-case>
- DfE Prevent helpline for staff and governors 020 7340 7264
counter.extremism@education.gov.uk

Other school policies and procedures which relate to the Safeguarding Policy:

- Anti-bullying
- Behaviour Policy
- Health and Safety
- Confidentiality Policy
- Restraint Policy
- Staff Handbooks – Guidance on Staff Pupil Relationships
- Staff Handbooks – Code of Conduct
- Staff Handbooks – IT Acceptable Use Policy
- ICT Acceptable Use Policy - Students
- Procedures for visitors, temporary placement, volunteers and contractors
- Whistleblowing Policy
- Visiting Speaker Policy
- Prevent statement
- The role of the DSLs DDSLs
- Recruitment Policy

2.0 Definitions and indicators of child abuse and neglect

Child abuse is any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family, in an institution or in a community setting by those known to them or, more rarely by others. They may be abused by an adult or adults or another child or children. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. An abused child is any boy or girl,

under 18 years of age, who has suffered from, or is believed likely to be at risk of significant physical injury, neglect, emotional abuse or sexual abuse.

- physical abuse, for example hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing, or failing to prevent, physical injury or suffering. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or inadequate, or valued only in so much as they meet the needs of another person. It may involve not giving the child an opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional need.

Signs of abuse

Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- the pupil says she has been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the pupil's development is delayed in terms of emotional progress
- the pupil loses or gains weight
- the pupil demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes
- the pupil appears neglected, e.g. dirty, hungry, inadequately clothed; and the pupil is reluctant to go home, or has been openly rejected by her parents or carers.

3.0 Specific safeguarding issues

3.1 Child on child abuse

Children can abuse other children. This may take a number of forms including, but not limited to bullying (including cyber-bullying), sexual violence and sexual harassment, physical abuse, sexting and initiation or hazing type rituals. Keeping Children Safe in Education Annex A September 2021 gives further information on the nature and indicators of child on child abuse and staff should discuss any concerns with the DSL without delay. At Burgess Hill Girls cases of abuse by one or more pupils against another pupil are rare but we recognise the importance of dealing promptly with any issues that may arise and we maintain an attitude of 'it could happen here'.

The school recognises the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys, perpetrators), but that all child on child abuse is unacceptable and will be taken seriously. The school recognises that upskirting is now a criminal offence and is cognisant of the Voyeurism Offences Act 2019. The school recognises that upskirting could represent a form of child sexual exploitation or abuse by an adult or could manifest itself as child on child abuse. Upskirting would typically involve taking a picture under a person's clothing without their knowledge.

- all members of the Burgess Hill Community know and understand the term 'abuse is abuse' and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up.'

- student time, PSHEE (Whole School) provide opportunities along-side the taught curriculum and the visiting speakers programme to reinforce an understanding of what constitutes 'Peer-on peer abuse' and to ensure such situations are kept to a minimum.
- our close community, excellent knowledge of each individual pupil and our proactive pastoral teams are well placed to spot this form of behaviour and raise awareness before the situation escalates.
- in the case of such situations arising the schools Anti-Bullying policy takes effect.
- all potential allegations of child on child abuse should be reported, via My Concern, to the DSL.
- each case will be approached on an individual basis and the outcome determined by the severity of the case. Irrespective of the seriousness parents of all parties will be notified and involved.
- both the victim, perpetrator and any other child affected will be supported by a designated member of staff.

3.2 Sexual violence and sexual harassment between children

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, 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.

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are the victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline.

Sexual violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence in this advice, we do so in the context of child-on child-sexual violence. For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape:

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

Assault by Penetration:

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

Sexual Assault:

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

What is consent?

Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Sexual harassment

For the purpose of this advice, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual "jokes" or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.
- online sexual harassment, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting), inappropriate sexual comments on social media; exploitation; coercion and threats.

Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It is important that staff consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviours

Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviours are developmentally inappropriate and may cause developmental damage. A useful umbrella term is 'harmful sexual behaviours'. Advice on signs, indicators and effects of harmful sexual behaviours is available here:

NSPCC: Harmful sexual behaviour: signs-indicators-effects. The term has been widely adopted in child protection and is used in this advice. Harmful sexual behaviours can occur online and offline and can occur simultaneously between the two. Harmful sexual behaviours should be considered in a child protection context. When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. The Brook sexual behaviours traffic light tool can help when considering harmful sexual behaviours. Detailed advice on harmful sexual behaviours is available from the specialist sexual violence sector:

Contact Rape Crisis or the Survivors Trust for details of the nearest centre. Also, see NSPCC: Harmful sexual behaviour, and NICE guidance for advice on, amongst other things:

developing interventions, working with families and carers; and multi-agency working. It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of harmful sexual behaviour. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding.

Harmful sexual behaviours can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Responding to reports of sexual violence and sexual harassment

The school is committed to ensuring that children have clearly understood mechanisms to report abuse and that they know that their concerns will be taken seriously. The school will ensure a considered, calm and appropriate response will be made to any reports on a case by case basis and will contribute fully to multi-agency working in response to a report. The school will seek support and guidance from safeguarding partners as set out in paragraph 465 of KCSIE 2022.

The school recognises that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

All staff are trained to manage a report to include the following considerations:

- if possible, managing reports with two members of staff present, (preferably one of being the DSL or a DDSL)
- careful management and handling of reports that include an online element, including being aware of searching screening and confiscation advice and UKCIS Sharing nudes and semi-nudes. The key consideration is for staff not to view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL (or DDSL) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- recognising that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was

- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report

sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools and colleges 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/college. The designated safeguarding lead (or DDSL) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school or college.

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 or college'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, adult students or school or staff, other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation?

The DSL and DDSs will familiarise themselves with the local safeguarding partners' threshold document.

3.3 Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can be a warning sign of a range of safeguarding issues including abuse and neglect, sexual abuse or exploitation, mental health problems, substance abuse, travelling to conflict zones, risk of female genital mutilation and risk of forced marriage. Early intervention is vital and staff should be aware of the school's unauthorised absence procedures.

As part of the transfer process contact will be made to confirm all pupils leaving Burgess Hill Girls have started at the school they have indicated as their new school. If the outcome is not confirmed parents will then be contacted to confirm the name of the school and then a confirmation communication will be made.

3.4 Honour based abuse

So-called 'honour based abuse' can include forced marriage and Female Genital Mutilation ('FGM'). School staff will be alert to possible indicators of 'honour based abuse'. Guidance on the warning signs of 'honour based abuse' can be found on pages 38-41 of the Multi-Agency Statutory Guidance on FGM <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation> and pages 13-14 of the Multi-Agency Guidelines: Handling cases of forced marriage <https://www.gov.uk/stop-forced-marriage>

From October 2015, all Teachers (along with Social Workers and Healthcare practitioners) have a statutory duty to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Head to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

3.5 Female genital mutilation

There are four types of Female Genital Mutilation categories by the World Health Organisation and many names given to it. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy.

Indications that FGM might take place soon include:

A girl may confide that she is about to have a 'special procedure' or to attend a special occasion to 'become a woman'. A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk. Parents state that they or a relative will take the child out of the country for a prolonged period. A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent

Indications that may have already taken place include:

A girl may have difficulty walking, sitting or standing and may even look uncomfortable. A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems, spending longer than normal in bathroom due to difficulties urinating. There may be prolonged or repeated absences from school and behaviour changes upon her return.

Where a member of staff suspects that an act of FGM appears to have been carried out on a girl who is under 18, there is a statutory duty to report it to the police; those failing to report such cases will face disciplinary sanctions. Staff will not be examining pupils. All staff should discuss such cases with the DSL immediately.

3.6 Forced marriage

Example indicators (not exhaustive) of pupils vulnerable to forced marriage include:

- the impairment of social, educational and career development, including financial dependence and lifestyle restrictions.
- pupils suffering emotionally and showing signs of self-harm, including self-cutting or anorexia.
- pupils suffering anxiety, becoming withdrawn and suffering from low self-esteem.
- pupils possible, dramatic decline in academic or co-curricular performance, in aspiration, self-motivation or showing different markers in things like punctuality or appearance.

- pupils possibly coming to the attention of authorities outside school being discovered shoplifting or taking drugs and alcohol.
- pupils presenting with an unexpected amount of missed school or becoming anxious close to extended periods of school holiday when school closes.
- parents intervening inappropriately about decisions on subject choice or university/post school destination.
- family patterns with elder siblings (of both genders) of attendance or behaviour;
- possible inappropriate need by the pupil for assurance from specific teachers or other adult members of staff.

3.7 Child Sexual Exploitation, Child Criminal Exploitation, county lines and gangs

Child sexual exploitation and child criminal exploitation are form of child abuse occurring where an individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. This may be in exchange for something the victim needs or wants and / or for the financial advantage or increased status of the perpetrator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact. It can occur through the use of technology. This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Both child sexual exploitation and child criminal exploitation can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

NB – although some young people who are being exploited do not exhibit any external signs Indicators include:

- Going missing for periods of time/coming home late
- Regularly missing school
- Appearing with unexplained gifts/new possessions

Associating with other young people involved in exploitation
Having older boy/girl friends
Suffering from sexually transmitted infections
Mood swings/changes in emotional well-being
Drug and alcohol misuse
Displaying inappropriate sexualised behaviour

Staff should be aware of the potential and associated risks and the school adheres to advice given by the home office in Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

3.8 Domestic abuse or violence

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

Burgess Hill Girls monitors the information provided by Operation Encompass via email alerts, which gives the Head and DSL notification relating to any pupil who has been exposed to a domestic violence incident that was attended by the Police.

School staff understand that pupils who are exposed to domestic violence are potentially vulnerable and may need support and guidance.

3.9 Mental health

- Staff should recognise that mental health problems can, on occasions, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Experiences relating to the COVID-19 pandemic including lockdown, remote learning, the cancellation of examinations and anxiety related to the return to full-time schooling may increase the risk of mental health issues for some pupils and staff.
- Staff are well-placed to observe a child's day to day behaviour and moods that could suggest that they are experiencing a mental health problem or are at risk of developing one. However, only trained staff should attempt a diagnosis of a mental health problem.
- If staff have a concern about a child's mental health they should regard it as a safeguarding concern and report it immediately to the DSL or pastoral head.
- The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has

produced a range of resources to support teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol.

3.10 Radicalisation and extremism

Radicalisation is the process by which a person claims to support terrorism and forms of extremism. Extremism is defined as vocal or active opposition to fundamental British values including democracy, rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Staff should be alert to changes in girls' behaviour which could indicate that they could be in need of help or protection. Girls at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. The Prevent duty does not require teachers to carry out unnecessary intrusion into family life but, as with any other safeguarding risk, they must take action when they observe behaviour of concern. All staff should encourage pupils to develop positive character traits (such as resilience, determination, self-esteem and confidence). This will enable them to manage risk, make safer choices and recognise when pressure from others threatens their personal safety and wellbeing. Reference should be made to:

Revised Prevent Duty Guidance: for England and Wales (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:

The Prevent duty: Departmental advice for schools and childminders (June 2015)

The use of social media for on-line radicalisation (July 2015)

Any staff with concerns should report it via, My Concern, to the DSL. (Please see Prevent lead contact details:

Email counter.extremism@education.gov.uk

Telephone 020 7340 7264

If the member of staff contacts the police or Prevent directly, they should still complete the My Concern report to the DSL.

Following a conversation with Police or the Local Authority, a referral to the Channel Programme may be made. Channel is a voluntary Government-funded programme which aims to safeguard children and adults from being drawn into terrorist activity. Channel can provide a support plan and specific interventions to protect people at risk including mentoring support for ideological

or theological intervention. It is the school's policy that all staff are encouraged to undertake a Channel awareness e-learning programme.

If you are concerned that a child's life is in immediate danger or that she may be imminently planning to travel to Syria or Iraq, you should dial 999 or call the confidential anti-terrorism hotline on 0800 789 321.

3.11 Bullying including cyberbullying

See 10a Anti-bullying Policy

3.12 Sexting

Definition (NSPCC) "Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using any device that allows you to share media and messages such as mobiles, tablets, smartphones and laptops".

All incidents involving youth produced sexual imagery and/or sexually explicit messages should be responded to in line with the school's safeguarding policy. (see section 4 below).

3.13 Upskirting

The Voyeurism (Offences) Act 2020 creates two new offences criminalising certain acts of voyeurism. The new offences criminalise the operation of equipment or recording of an image under another person's clothing (without that person's consent or a reasonable belief in their consent) with the intention of viewing, or enabling another person to view, their genitals or buttocks (whether exposed or covered with underwear) in circumstances where the genitals, buttocks or underwear would not otherwise be visible, where the purpose is to obtain sexual gratification or to cause humiliation, distress or harm. The victim may be male or female.

Offences carry a two-year maximum prison sentence and may result in the convicted offender being made the subject of police notification requirements (commonly referred to as being placed on the sex offenders register).

Where a person intends to carry out an upskirting offence and carries out an act which is more than merely preparatory to committing the offence e.g. by attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery, they can still be charged with attempt to commit the offence under the Criminal Attempts Act 1981.

3.14 Other issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information can be found on the TES website and NSPCC website. Staff can also access broad government guidance on the issues listed below via the GOV.UK website. Staff are aware of the wider specific safeguarding issues and that behaviours linked with drug-taking, alcohol abuse, truanting and sexting put children in danger.

4.0 The management of safeguarding

4.1 Governance

The Governing Body takes seriously its responsibility under section 157 of the Education Act 2011 to safeguard and promote the welfare of the pupils and to work together with other agencies to ensure adequate arrangements within our school to identify, assess and support those children who are suffering or are at risk of suffering harm and or abuse those who are in need of additional support from one or more agencies. The Governors recognise their responsibility to ensure that the school understands the risks arising from pupils that go missing from education or may be at risk from radicalisation and that effective procedures are in place to minimise these risks.

The governing body is aware of its obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements in line with KCSIE 2022 paragraphs 81 to 93.

The Governors will appoint a member of the Governing body as the named Safeguarding Governor. The Governors will also appoint a Governor with responsibility for monitoring the Safer Recruitment procedures, a Governor with responsibility for monitoring Health and Safety procedures and a Governor with oversight of boarding and EYFS.

The designated governor will prepare an annual report for the Governing Body in consultation with the DSL and DDSs who will be asked to provide evidence of implementation of procedures and lessons learned.

The Board of Governors recognises that safeguarding is a collective responsibility for the whole governing body and will receive reports from the Safeguarding Governor, the Governor with responsibility for monitoring the Safer Recruitment procedures, the Governor with responsibility for monitoring Health and Safety procedures and the Head annually.

The Board of Governors recognises its responsibility to ensure that the school's IT systems have filters and monitoring procedures in place and that their effectiveness is regularly reviewed.

A review of the safeguarding policy will take place at least annually and include an update and review, at board level, of the effectiveness of procedures and their implementation.

4.2 The role of the Designated Safeguarding Leads

The job descriptions for the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are set out in appendix C and are informed by the requirements set out in Annex C of Keeping Children Safe in Education 2022

4.3 Staff responsibilities and staff/pupil relationships

All employees of Burgess Hill Girls aim to:

- support each pupil's development in ways that will foster security, confidence and independence
- provide effective provision in school for listening to the concerns of pupils in order to ensure early help
- an annual session will be provided, age specific, by pastoral leaders to all girls on keeping themselves safe
- provide an environment in which children and young people:
 - feel safe, secure, valued and respected
 - feel able to, and know how to, approach adults if they are in difficulties; believing they will be effectively listened to
- raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- provide a systematic means of monitoring children known or thought to be at risk of harm and those who are in need of additional support from external agencies, and ensure we, the school, contribute to assessments of need and support packages for those children
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences are 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.
- emphasise the need for good levels of communication between all members of staff
- develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse
- review and support staff in relation to safeguarding matters to encourage improved professional practice over time
- develop and promote effective working relationships with other agencies, especially the police and social care

The Head has authorised staff to use 'reasonable force' to prevent a pupil compromising their own or others' safety and well-being (see Restraint Policy).

The School will support all pupils by:

- promoting a culture of safeguarding
- encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst condemning aggression or bullying (see anti-bullying policy)
- teaching them about safeguarding, including online, through the curriculum and PSHEE
- promoting a caring, safe and positive environment within the school ensuring that appropriate child protection checks and procedures apply to all staff including those employed by another organisation working with the school's pupils on another site
- liaising and working together with all other support services and those agencies involved in the safeguarding of children
- where applicable the school will ensure that staff have the training to enable them to develop the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. Appropriate staff will be provided with up to date assessment information from the relevant local authority together with the most recent care plan available. Information will be provided regarding contact arrangements with parents, and delegated authority to carers, and information available to the designated person
- establishing procedures to enable pupils to report abuse by pupils against other pupils (child on child abuse)
- ensure arrangements are in place for the dealing with allegations of child on child abuse, including sexting and other relevant issues and that the victims are well supported
- establishing procedures to enable pupils to report abuse by the Head, members of staff or volunteers

Within Burgess Hill Girls we will:

- ensure all parents/guardians/carers are made aware of the responsibilities of staff members with regard to child protection procedures, in accordance with locally agreed inter-policy procedures through publication of the School's Safeguarding Policy on the School Website and in hard copy on request
- ensure selection and recruitment of staff and volunteers adheres to safer recruitment procedures and meets the requirements set down in the Keeping Children Safe in Education (September 2022) guidance
- ensure the School's recruitment process includes DBS checks and conforms to the requirements of the Independent Schools Standards Regulations (ISSR) 2014 (or as subsequently amended) (see safer recruitment policy)

- ensure that external providers of services have satisfied all relevant checks and regulations for working with children
- ensure that all staff know the name of the designated persons and their roles
- ensure that all staff and Governors read part 1 of Keeping Children Safe in Education – September 2022 and where required Annex A.
- ensure that all staff read, understand (and sign to indicate this) and comply with the requirements of the Staff Behaviour Policy/Code of Conduct
- ensure that all staff, pupils and Governors are aware that any member of staff may make a referral to external agencies
- keep written records, using My Concern, of concerns about children, noting the date, event and action taken and ensure that these records are kept secure
- ensure that staff know and understand that, in dealing with allegations or incidents of bullying, it may be necessary to invoke safeguarding procedures and inform the DSL
- ensure staff, and pupils are protected if they report allegations of abuse by another member of the school community (see 'Whistleblowing Policy/Procedure')
- follow the process outlined in Keeping Children Safe in Education (appendix B) 'Action when a child has suffered or is likely to suffer harm' (at the end of this document).
- work to develop effective links with the relevant agencies and cooperate as required with enquiries regarding safeguarding matters including attendance at case conferences and interagency meetings
- inform Children's Services if there is an unexplained absence of a pupil on the Child Protection Register of more than two days duration from school, or one day if following a weekend
- transfer relevant Child Protection information to a new school or college if/when a pupil on the Child Protection register leaves the school and inform the Local Education Authority of any change of school or schooling to home-schooling (Children Missing Education 2016)
- inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations. Ofsted will be informed as soon as is reasonably practicable, but at least within 14 days
- appropriate checks will be made to ensure that the school has a commitment to ensure the safety of pupils when offsite, by following the rigorous safeguarding procedures, including the scrutinized risk-assessment produced internally, and accessing external documentation. No unsupervised activities take place on internal or external trips
- the school is committed to reporting promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met

- consideration of a referral to the TRA will be made where a teacher has been dismissed (or would have been dismissed if they had not resigned) and a prohibition order may be appropriate. The reasons such an order may be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a conviction at any time for a relevant offence.

4.4 Volunteers, outside agencies and contractors

Volunteers

Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. Under no circumstances must a department or member of staff bring in a volunteer without discussing this first with the Head, Head of Prep School or the Bursar.

Volunteers who, on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in schools and colleges, will be in regulated activity. The School will obtain an enhanced DBS certificate (which should include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, the School may conduct a repeat DBS check (which should include barred list information) on any such volunteer should they have concerns.

There are certain circumstances where the School may obtain an enhanced DBS certificate (not including barred list information), for volunteers who are not engaging in regulated activity. This is set out in DBS workforce guides, which can be found on GOV.UK. Employers are not legally permitted to request barred list information on a supervised volunteer as they are not considered to be engaged in regulated activity. The school will undertake a documented risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so they should consider:

- the nature of the work with children;
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers; whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability;
- whether the role is eligible for an enhanced DBS check;

Through the risk assessment, the School will determine if the volunteer will need supervision at all times. In making this decision, and where an individual is supervised, to help determine the appropriate level of supervision schools must have regard to the statutory guidance issued by the Secretary of State. This guidance requires that, for a person to be considered

supervised, the supervision must be:

- by a person who is in regulated activity;
- regular and day to day; and “reasonable in all the circumstances to ensure the protection of children.”

The DBS cannot provide barred list information on any person, including volunteers, who are not in, or seeking to engage in regulated activity

Visitors

All visitors during the school day are required on arrival to sign in at Reception, Prep or Senior School. Visitors will be issued with information about safeguarding arrangements. Visitors should remain under the supervision of a member of staff at all times and be escorted back to the respective Reception where the badge must be returned. Unidentified visitors must be reported immediately to Reception.

Visiting speakers

The Prevent Statutory Guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values. The lead organiser within the School is required to undertake a risk assessment before agreeing to a visiting speaker attending the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant. Visiting speakers will be expected to understand that where appropriate their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee at all times. On attending the School, Visiting Speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Third-party groups

This Safeguarding Policy will be brought to the attention of organisers of third party groups using the School facilities and applies to them if there are children aged under 18 on the site.

Voluntary sector groups that operate within the School, provide off-site services for our pupils, or use school facilities, will be expected either to adhere to this Safeguarding Policy or to operate a policy which is compliant with the requirements of the local Safeguarding Children Board.

Contractors

Building contractors who are engaged by or on behalf of the school to undertake works on site will be made aware of this policy and the reasons for this. Long-term contractors who work regularly in the school during term time will be asked to provide their consent for enhanced DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the Leadership Team deem this to be appropriate. During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety Risk Assessments will include the potential for contractors or their employees to have contact with the children. Individuals and organisations that are contracted by the school to work with, or provide services to, pupils will be expected to adhere to this policy and their compliance will be monitored.

Security

No internal doors to classrooms will be locked while pupils are present in these areas. Entry to School premises will be controlled by doors that are secured physically by keypad access control or by constant staff supervision or video surveillance. Authorised visitors to the School between the hours of 8am and 6.30pm will be logged into and out of the premises and will be issued with School visitor badges and given safeguarding information. Unidentified visitors will be challenged by staff or reported to the Head, Head of Prep School, the Bursar and either Prep or Senior School Reception. Carelessness in closing any controlled entrances will be challenged. The presence of intruders and suspicious strangers seen loitering near the School or approaching pupils will be reported to the Police, by calling 101 or 999 depending on the circumstances and the urgency of the case, so that if Police stop these individuals they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to LA's Schools Safeguarding Coordinator with a view to alerting other local schools in liaison with the Police through appropriate systems.

4.5 Induction and training

- all members of the Governing Body receive specific Child Protection and Safeguarding training provided by DSL and Educare online to enable them to understand and fulfil their responsibilities
- the Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and other Designated Members of Staff have undertaken appropriate training and will attend refresher courses in child protection and inter agency working at least every 2 years

- the Head and all staff who work with children will receive training in Safeguarding including Prevent awareness, child sexual violence and on-line safety updated every year or more frequently as required.
- supply temporary and voluntary staff who work with children are to be made aware of the arrangements
- induction training is provided for all newly appointed staff and volunteers, including temporary or supply staff to include; reading Part 1 of KCSIE, The School's Safeguarding Policy, the Staff Code of Conduct / Behaviour Policy including the 'whistleblowing' procedure, the pupil behaviour policy, the school's response to those who go missing from education, online safety, the identity and role of the DSL/DDSLs,
- school leaders and staff who work directly with children must read Annex B of KCSIE 2022.
- all staff will be asked to re-read Part 1 of KCSIE on an annual basis and, where appropriate, following any update by the DfE.
- The Governors will take a proportionate, risk-based approach to the level of information that is provided to temporary staff and volunteers.

The training is provided by a trained DSL, the local social services department or an external welfare agency acceptable to the West Sussex Safeguarding Children Partnership. Within the school, those who are designated persons with up-to-date inter-agency training may also provide the training to other staff.

4.6 Whistleblowing

If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy found on the staff intranet and in the common room. Concerns regarding the behaviour of colleagues which is likely to put pupils at risk of abuse or other serious harm may be dealt with in accordance with the School's Managing Allegations of Abuse against Staff Procedure (see 4.7 below). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing website helpline (tel: 0800 0280 285 or email: help@nspcc.org.uk).

4.7 Managing allegations or concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors.

The School will:

- ensure that all parents, staff and pupils know how to complain about the behaviour or actions of staff, volunteers or Head in the setting, or anyone living or working on the premises occupied by the setting, which may include an allegation of abuse

- the School uses the safeguarding system Confide to record low level concerns about members of staff
- if the allegation is made against the Head, referral should be made to the Chair of Governors. The Head must not be informed prior to contact with the Chair of Governors or Designated Officer.
- if the subject of the allegation is a member of supply staff, the school will lead in informing the LADO and keep the supply agency fully informed and involved. The school will not merely cease to use supply staff or an agency for safeguarding reasons.
- if the allegation is made against a Governor, referral should be made to the Head and the Designated Officer (LADO)
- the school will not conduct its own investigation but will consult with the Designated Officer within one working day for any allegation that comes to the School's attention or is made directly to the police
- follow the guidance of the West Sussex Safeguarding Children Partnership when responding to any complaint that a member of staff, volunteer or Head within the setting or anyone living or working on the premises occupied by the setting, has abused a child. A course of action will be agreed with the Designated Officer including any involvement of the police. Discussions and communications will be recorded in writing and records of allegations will be preserved for the term of the Independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegations if it is longer.
- report to the DBS, within one month of leaving the school any person (whether employed, contracted, volunteer, supply or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This 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.
- where a dismissal does not reach the threshold for a DBS referral, consideration will be given to Teacher Referral Agency if any of the following apply: unacceptable professional conduct; conduct that may bring the profession into disrepute; a conviction for a relevant offence
- respond to any disclosure by children or staff that abuse by a member of staff, volunteer or Head within the setting, or anyone living or working on the premises occupied by the setting, may have taken, or is taking place, by first recording the details of any such alleged incident, using Confide.
- refer any such complaint immediately to the local authority's social care department to investigate. We also report any such alleged incident to OFSTED and what measures we have taken. We are aware that it is an offence not to do this
- cooperate entirely with any investigation carried out by children's social care in conjunction with the police

Where the Governing Body and children's social care agree it is appropriate in the circumstances, the chair will suspend the Head or member of staff on full pay, or the volunteer, for the duration of the investigation. This is not an indication of admission that the alleged incident has taken place, but is to protect the staff as well as children and families throughout the process.

The School recognises that when an allegation is made against a teacher the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays will be eradicated.

We will aim to restrict the reporting or publishing of allegations against teachers and thus make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE / General Teaching Council publish information about an investigation or decision in a disciplinary case. The school will adhere to procedures relating to allegations against a member of staff as set out in Part 4 of Keeping Children Safe in Education – September 2022.

Disciplinary Action

Where the Head, member of staff or a volunteer is dismissed from the School because of misconduct relating to a child, we notify the Independent Safeguarding Authority (ISA) administrators so that the name may be included on the Protection of Children and Vulnerable Adults Barred List

Malicious Allegations

- Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's Behaviour policy.
- Where a parent has made a deliberately invented or malicious allegation the Head will consider (in accordance with the School's terms and conditions) whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.
- The school is committed to safer recruitment process (see Recruitment Policy)

Record keeping:

Details of an allegation will be recorded on the safeguarding system – Confide, the employee's file and retained indefinitely, unless the allegation was found to have been malicious, in which case it will be removed from the employee's records.

Low Level Concerns

Some concerns or allegations may not meet the harm threshold. However, in order to create an open and transparent culture of safeguarding in the school, staff are encouraged to pass on any concerns they may have about all adults working with children, no matter how small, and even if no more than something causing a sense of unease or 'nagging doubt' that an adult working in or on behalf of the school may have acted in a way that:

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

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- using inappropriate sexualised, intimidating, humiliating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial these 'low level concerns' are reported. They will be recorded, safeguarding system Confide, dealt with effectively and sensitively, and should also protect those working in or on behalf of the school from potential false allegations or misunderstandings. If the concern has been raised by a third party, the Head will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses. Staff should also feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Staff code of conduct, whistleblowing and behaviour policies are designed to achieve the following:

- to ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- to ensure that staff feel empowered to share any low-level safeguarding concerns
- to address unprofessional behaviour and supporting the individual to correct it at an early stage
- to handle and respond to such concerns sensitively and proportionately when they are raised, and

- to help identify any weakness in the school's safeguarding system.

The school will take the following actions in relation to low level concerns and/or allegations which do not meet the 'harm' threshold:

- All low-level concerns will be recorded in writing using the safeguarding system Confide
- The record will include details of the concern, the context in which the concern arose, the investigation(s) carried out and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- The information collected will help to categorise the type of behaviour and determine what further action may need to be taken.
- These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- As part of the annual review of safeguarding, these records will be reviewed at least annually so that potential patterns of concerning, problematic or inappropriate behaviour can be identified – which will be addressed either through the school's disciplinary procedures or (where a pattern of behaviour moves from a concern to meeting the harms threshold) after referral to the LADO.
- Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur. Amendments to policies and training will be considered to minimise the risk of it happening again.
- Reports about supply staff and contractors will be notified to their employer so that any potential patterns of inappropriate behaviour can be identified.
- Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding, and not to misconduct or poor performance, should not be referred to in a reference.
- When appropriate, follow-up conversations will take place with the relevant member of staff. The Head has overall responsibility for handling concerns about staff, but in accordance with the local safeguarding guidance, may delegate follow-up conversations to the DSL or designated safeguarding governor.

4.8 Safer recruitment practices, DBS and TRA referrals

Burgess Hill Girls follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations 2014. Please also see the School's Safer Recruitment Policy, recruitment pack and staff Code of Conduct. All located within the staff intranet.

In line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2022), the Chair of Governors and the Head prevent people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking

proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors or consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.

The School works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings. As part of carrying out safe recruitment procedures under KCSIE September 2022, members of the Teaching and Support staff at the School including part-time staff, temporary and supply staff, volunteers, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. An enhanced DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. A person who is subject to a teacher prohibition or an interim prohibition order must not be appointed to a role that involves teaching work, as defined by KCSIE 2022. Individuals who have lived or worked outside the UK must undergo the same checks as all other staff at Burgess Hill Girls. This will include obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, the school will make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered. For further details on further checks conducted please refer to the Safer Recruitment Policy. Those undertaking management posts or roles will be subject to Prohibition from Management of Independent School's checks.

A section 128 direction check will be made on all internal and external appointments that take part in the management of the School. Staff that take on additional management responsibilities may also be subject to the 128 direction and this will be decided on a case-by case basis.

All Governors, volunteers and contractors working regularly during term-time (such as catering staff) are also subject to the enhanced DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at School or on another site.

Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

If the DBS has not been received prior to the member of staff's start date, the School would

risk assess against the need for the member of staff to start work or whether this can be delayed until the certificate has been received. This will be in line with the ISI Handbook, The Commentary on the Regulatory Requirements. Where an individual is to start work before the DBS disclosure is received the appropriate Safeguarding control measures will be assessed and agreed by the individual and reviewed at least every two weeks. This is noted upon the DBS pending risk assessment form, kept within the individual personnel file and referred on the Single Central Register.

Where there has been a break in service for three months or more the member of staff is subject to further DBS checks including checking the barred list.

Selected members of the leadership team and departments heads have undertaken Safer Recruitment training through nationally accredited programmes.

- we will aim to restrict the reporting or publishing of allegations against teachers and thus make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/TRA (Teaching Regulation Agency) publish information about an investigation or decision in a disciplinary case
- Burgess Hill Girls has 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'
 - 'conviction, at any time, for a relevant offence'

Further guidance is published on the TRA website. Where a referral has been made to the DBS, it is not necessary for a referral also to be made to TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.

4.9 Disqualification under the childcare act 2006 (July 2018)

The government publication 'Keeping Children Safe in Education' refers to how staff can be disqualified and explains the effect of the Disqualification under the Childcare Act 2006 (July 2018). The advice applies to staff in schools who work in Early Years provision and to those who work in Later Years provision for children who have not attained the age of eight. It also applies to employees who are directly concerned in the management of such provision even though they may not work in the Early Years or relevant Later Years provision themselves. Early Years' provision includes education and any supervised activity for a child from birth until the 1 September following their fifth birthday. It applies to all provisions for children in that age range during and outside school hours, including working in Reception classes.

The supplementary advice reminds schools that they do not allow people to work in these settings or to be directly concerned in their management, if they are 'disqualified'. The grounds for disqualification are not only that a person is barred from working with children (included on the children's barred list) but also include, in summary, that:

- They have been cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad
- Other orders have been made against them relating to their care of children
- They have had their registration cancelled in relation to childcare or children's homes or have been disqualified from private fostering
- Being on the DBS Children's Barred List

Disqualification occurs as soon as the above criteria are met, for example, as soon as a caution or conviction occurs, even before the person is formally included on the children's barred list.

However:

The law is clear that this issue centres on 'knowingly employing' an individual who is disqualified. The school regularly asks staff to confirm there are no changes in their circumstances and will act on information received with regards to a staff member's suitability. The School should be seen to be taking reasonable and appropriate steps to ensure they do not knowingly employ someone who is disqualified.

Since September 2015 we ask for this information as part of the pre-employment checks we undertake on appointing new staff we know are likely to be working in the Early and Later Years. Recruitment processes for all roles in the School will also include a check on whether or not a disqualification ruling might apply to potential employees.

In addition, Burgess Hill Girls will undertake regular requests for employees to inform them in the event that they are knowingly affected. Such requests will take place at least annually and be recorded by the Head of the Prep School.

All staff in our School are required to notify the School immediately if there are any reasons why they should not be working with children. The Childcare Act 2006 apply to those providing Early Years' childcare or Later Years' childcare, including before school and after school clubs, to children who have not attained the age of 8, and to those who are directly concerned in the management of that childcare. The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the School immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive. Staff who are disqualified from childcare or registration, may apply to Ofsted for a Waiver of Disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the

Bursar for more details. Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

5.0 Safeguarding procedures

5.1 Identifying concerns, recording and monitoring

If you have any cause for concern in relation to a pupil's well-being or have encountered signs of possible abuse you must report your concern directly to the DSL who will make the appropriate decision according to the situation. Any member of staff can refer directly to local agencies if necessary. We recognise the difference between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. Subject to procedures put in place by the West Sussex Safeguarding Children Partnership and reporting thresholds, the former should be reported to Children's Social Care immediately; the latter should lead to early help, inter-agency assessment and intervention using local procedures, including use of the 'common assessment framework' (CAF) and 'Team Around the Child' (TAC) approaches.

5.2 Early help and intervention

Early help means providing support as soon as a problem emerges, at any point in a child's life, from the Nursery until Sixth Form. Early help can prevent further problems arising and/or escalating in the future. Staff at the School are aware of the importance of being alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care

- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child.

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Staff are aware of the benefits of early help to a pupil who may be experiencing difficulty, and understand their role in identifying emerging problems, reporting these via My Concern, liaising with members of the pastoral team and sharing concerns with the DSL as soon as possible and certainly within 24 hours.

Statutory assessments

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local authority's referral process.

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 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 and neglect, female genital mutilation or other so-called honour based abuse, and extra-familial threats like radicalisation and sexual exploitation. The online tool 'Report child abuse to local council' directs to the relevant local children's social care contact number.

For all concerns relating to the welfare, health and safety of a child the School's DSL or in their absence one of the DDSLs should be informed without delay:

Immediate response to a disclosure report of sexual violence or sexual harassment

The initial response to a disclosure is important and staff should ensure the victim is taken seriously and supported. All staff are trained to manage a report.

- Staff should not assume that someone else is dealing with the incident, and should discuss concerns with the DSL.
- Where an incident between two pupils takes place away from the school, the school's duties remain the same.
- Staff are trained as per Part One of KCSIE on how to manage a disclosure.
- Staff should never promise confidentiality.
- The DSL and deputies should be aware of anonymity in cases where an allegation is progressing through the criminal justice system.
- Burgess Hill Girls will do all that it reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media.
- The DSL and/or deputies should make a risk assessment in cases of a report of sexual violence, considering the victim, alleged perpetrator and other children at the school.
- Risk assessments should be kept under review. In cases of sexual violence a professional risk assessment by external specialists may be required, and should be used to inform the school's own risk assessment.
- The School will consider carefully any report of sexual violence or harassment and act in the best interests of the child.
- It is important that sexual violence and sexual harassment are shown to be unacceptable, and not passed off as 'banter' or 'part of growing up'.
- While the facts are being established, the DSL and/or deputies should remove the alleged perpetrator from any classes shared with the victim, and consider how best to keep them a reasonable distance apart, in the best interests of both children.
- The DSL and/or Deputies should also consider carefully when to inform the alleged perpetrator, and this may be discussed with relevant agencies.

Referral

- If the cause of concern relates to the Head, then the Chair of Governors, should be informed without notifying the Head first. The Chair can be contacted through the Bursar in his capacity as Clerk to the Governors.
- If the Chair of Governors is not available, referral should be made to the Local Authority Designated Officer (LADO) without delay.

- If an allegation is made against a member of staff or volunteer the Head should be informed immediately. In the absence of the Head, the Chair of Governors, should be informed immediately.
- a referral may be made directly by any member of staff (see appendix B)
- In case of serious harm and or abuse, the police should be informed from the outset.

When deciding whether to make a referral, following an allegation or suspicion of abuse, the Head and/or DSL will not make their own decision over what appear to be borderline cases, but rather the doubts and concerns will be discussed with the Designated Officer (LADO), or the relevant safeguarding partners. Parental consent is not required when making a referral.

The School will:

- not do anything that may jeopardise a police investigation, such as asking leading questions, or attempting to investigate the allegations of abuse
- keep procedures for safeguarding children under review and ensure they are in line with the Local Safeguarding Children Board procedures (MASH) and our Safeguarding partners.
- communicate with West Sussex Safeguarding Hub (MASH) whenever an allegation or disclosure of abuse has been made and confirm in writing within 24 hours or as required
- facilitate inter-agency assessment using local processes for any child in need of additional support from one or more agencies
- make immediate contact with Children’s Social Care when safeguarding children who have suffered or are likely to suffer significant harm or abuse.
- for a child requiring additional support from one or more agencies, the designated safeguarding lead will make contact with outside agencies to allow inter agency assessment using local processes, including use of the “Common Assessment Framework (CAF)” and “Team around the Child” (TAC) approaches.

Response to sexting

All incidents involving youth produced sexual imagery and/or sexually explicit messages should be responded to in line with the school’s safeguarding and child protection policy. When an incident involving youth produced sexual imagery and/or sexually explicit messages comes to a member of staff’s attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Initial review meeting

The initial review meeting should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved - in most cases parents should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What you know about the imagery or messages suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- You have reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery or messages, for example, the young person is presenting as suicidal or self-harming

If none of the above apply, then the school may decide to respond to the incident without involving the police or children's social care (the school can choose to escalate the incident at any time if further information/concerns come to light). The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks

can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support

Further guidance is available from UK Council for Child Internet Safety (UKCIS) – Sexting in Schools and Colleges and College of Policing, Briefing note – Police Action in response to youth produced sexual imagery (Sexting) – November 2016.

Procedures for dealing with concerns or suspicions of abuse or neglect

The School treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our school staff are made aware of their duty to safeguard and promote the welfare of children in the School's care. Staff members are alerted to the particular potential vulnerabilities of looked after children.

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

If a member of staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to:

- listen to the child
- to provide reassurance and to record the child's statements, but not to probe or put words into the child's mouth
- on hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification
- leading questions should be avoided
- no inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility

Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in School should report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to the DSL or DDSL and submit an accurate written record, using My Concern, of the disclosure or concerns.

However, any staff member can make a direct referral to Children's Social Care or other

external services such as early help services in accordance with the referral threshold set out by WSCSB. The DSL and DDSLs should liaise with WSCSB and work with other agencies in lines with Working Together to Safeguard Children and NPCC – ‘When to call the police to help’ understand when they should consider calling the police and what to expect when they do.

As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak (also record on My Concern) with the DSL or DDSLs to agree a course of action, although staff can make a direct referral to children’s social care.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead (DSL).

Parents

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

Referrals

Safeguarding referrals should be made to the West Sussex Safeguarding Children Board

(WSSCB) in the Local Authority where the child lives via a Common Assessment Framework (CAF) form and copied to the LA's Schools Safeguarding Co-ordinator. Prior to any written CAF being sent as a referral to Social Care, there should be a verbal consultation with the WFSCB Social Worker or Manager, to ensure that making a referral is an appropriate action. It is important to ensure the child receives the right help at the right time to address risks and prevent issues escalating.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent police intervention will be requested.

In line with KCSIE (2022), the School will report historical abuse allegations to the police. All Prevent referrals should be made to the West Sussex Prevent Team regardless of the Local Authority in which a child lives. Parental or pupil consent is not required for a referral to statutory agencies where there are concerns about a child's safety; reference to parental consent must not apply when a child is or may be at risk of harm; and schools do not require the consent of parents to refer allegations to Children's Social Care.

Where staff have concerns that a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and/or the Police immediately. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL that a referral has been made as soon as possible. Staff must share information with Children's Social Care and/or the Police where there are any concerns that a child may be at risk of harm or neglect. Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where a child's situation does not appear to be improving, the DSL or member of staff must follow this up with the Children's Social Care, push for reconsideration where appropriate. Any member of staff who has concerns that a child's situation does not appear to be improving should press for reconsideration.

Please refer to flow chart for actions where there are concerns about a child, Appendix A.

5.3 Promoting awareness

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all Support staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour Policy and in enforcing our Anti-Bullying Policy.

Time is allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, Drama and RS lessons are used to promote tolerance and mutual respect and understanding. Time is also allocated within PSHEE for the teaching of Relationship Education (Prep School) and Relationships and Sex Education (Senior School).

All pupils know that there are adults to whom they can turn to if they are worried, including our counselling provision and the medical staff. If the School has concerns about a child, there is always a recognised requirement for sensitive communication, and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- Our medical centre displays advice on where pupils can seek help.
- We provide leadership training to our Head Girls and their team of School Officers, House Captains/senior pupils and Mentors which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.

We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying please refer to the School's anti-bullying policy. E-safety to pupils is taught through PHSEE and associated curriculum and co-curriculum to pupils.

Staff will be made aware that safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours linked to drug taking, alcohol abuse, truanting, gender based violence, sexual assaults and sexting also put children in danger.

Burgess Hill Girls recognises that children are capable of abusing their peers and not just those in their peer group. The School's approach to minimise the risk is to build resilience in our pupils to protect themselves and their peers through education and information. This is achieved through:

- responsible Use of IT for pupils
- assemblies
- PSHEE, tutor or student time programmes.
- School Rules, Behaviour Policy and Anti-Bullying Policy
- the development of understanding of the benefits and potential issues associated with digital learning and the use of IT.
- pupils are encouraged to share any concerns they have about their safety and well-being with friends, their tutor, a trusted member of staff or the Designated/ Deputy Designated Safeguarding Leads

The School also recognises the different gender issues that can be prevalent in child on child abuse, for example, girls being sexually touched, upskirting and abuse within intimate partner relationships. We're also aware of the importance of monitoring verbal abuse especially when this is referred to as 'banter'.

All child on child abuse will be managed in accordance with this policy and a bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such instances will warrant a response under these procedures rather than the School's Behaviour Policy.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the West Sussex Safeguarding Children Board (WSSCB) on the investigation of such allegations (reported immediately or, at the latest, within 24 hours) and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. 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 the WSSCB, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the WSSCB or police as appropriate.

Victims and perpetrators of child on child abuse will be offered support by the School, as appropriate. This may be through Tutors, Heads of House, Pastoral Heads or other counselling located within the School.

5.4 Listening and understanding the child's wishes

Where there is a safeguarding concern the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. The School manages this by the DSL and/or appropriate member of staff regularly meeting as appropriate with the child to gain feedback and consider their wishes. The School will operate processes with the best interests of the pupil at their heart.

5.5 Vulnerable children and special educational needs

Risk to particular groups of pupils

- Pupils with special educational needs and disabilities (SEND) or pupils with English as an additional language (EAL) can face additional safeguarding challenges and there may be additional barriers in the recognition of abuse and neglect in this group of children. Staff understanding and knowledge of our children helps them to differentiate between indicators of possible abuse and behaviours which relate to the child's disability or special need. Staff understand that this group of children can be disproportionately impacted by

situations such as bullying or communication barriers (even without showing outward signs).

- The Burgess Hill Girls' Safeguarding Policy and procedures also take into account the requirement of the National Minimum Boarding Standards (2022) Standards 11, 12, 14 & 15. Particular consideration must be given to any allegations or disclosures of abuse or possible abuse by a boarder concerning themselves or another boarder. In such circumstances it may be necessary to arrange alternative accommodation for boarders to ensure the safety and well-being of the pupil and appropriate pastoral support. Boarders are also provided with one or more appropriate helpline(s) outside contact numbers, including the Children's Commissioner, Dame Rachel DeSouza, the School Independent Listener, and Childline, to ring in case of problems or distress. The inclusive ethos and emphasis on shared values of respect and compassion and training for House Staff protects against pupil on pupil abuse, but vigilance is maintained.
- Children who are lesbian, gay, bi or trans (LGBT) are not inherently at risk of harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Burgess Hill girls is committed to ensuring that LGBT pupils feel that they have trusted adults to whom they can talk as well as the support of the school's pupil led LGBTQ+ group. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education and the school's curriculum is committed to countering any instances of homophobic, bi-phobic and transphobic bullying or abuse.

5.6 Online safety, remote learning, social media and internet usage

The School will ensure that:

- It is a key element of the DSL's role to ensure that mechanisms are in place to promote online safety both within and beyond school.
- appropriate filters and monitoring systems are in place to keep children safe online. The School's systems enable web filtering that specifically blocks and alerts. Any suspicious activity or attempted access to inappropriate sites is logged and actioned by Network Manager and IT support team and escalated as required to the DSL.
- Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of harm.
- Children are taught about safeguarding, including online; and offline where technology can be used to facilitate offline abuse, such as downloaded videos, audio and/or imagery.

- staff are equipped with the knowledge to safeguard children online.
- The school liaises regularly with parents or guardians to reinforce the importance of promoting online safety and to explain the systems in place to filter and monitor online use. Advice is also given about the sites that pupils are asked to access and who in the school community that their child is going to interact with.

Burgess Hill Girls builds resilience in our pupils to protect themselves online by:

- Responsible Use of ICT for Pupils, PSHEE and Tutor programme, school rules, Behaviour Policy and disciplinary procedures and within curricular ICT lessons.
- Staff will only use the School's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head and Governing Body. Staff will only use the approved School email, or other School-approved communication-systems with pupils or parents/carers, and only communicate with them on appropriate School business and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers.

Burgess Hill Girls will adhere to DfE guidance 'Teaching Online Safety in School'. All computer equipment and internet access within the School will be subject to appropriate "parental controls" and Internet safety rules in line with our E-safety Policy. Pupils, staff and parents will sign the Acceptable Use Policy. The school's online safety procedures are informed by non-statutory guidance, 'Harmful Online Challenges and Online Hoaxes'.

5.7 Prevent strategy – radicalisation and extremism

See separate Prevent Statement – published to the School's website.

6.0 EYFS Early Years Foundation Stage (Nursery and Reception Class)

Our setting will work with children, parents and the community to ensure the rights and safety of children and to give them the very best start in life.

Liaison with other agencies

The designated members of staff within the Nursery setting may with support from the DSL take the lead responsibility for safeguarding children within the Nursery setting and liaising with local statutory children's agencies as appropriate.

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

Ofsted will be informed of the above as soon as is reasonably practicable, but at least within 14 days.

If a referral has been made by telephone to Children's Services or the Police Child Protection Team (investigating agencies) this referral must be confirmed in writing within 24 hours. Our referral should be acknowledged within 24 hours. If not, we ring them.

6.1 The Use of Mobile Phones and Cameras in the Nursery and Reception class

It is accepted that mobile phones are a part of everyday life for staff, parents, carers and students on placement. This policy is part of the EYFS commitment to safeguarding the welfare of children.

Staff/students working with the children should not be using their mobile phone as this distracts them paying full attention to the children in their care.

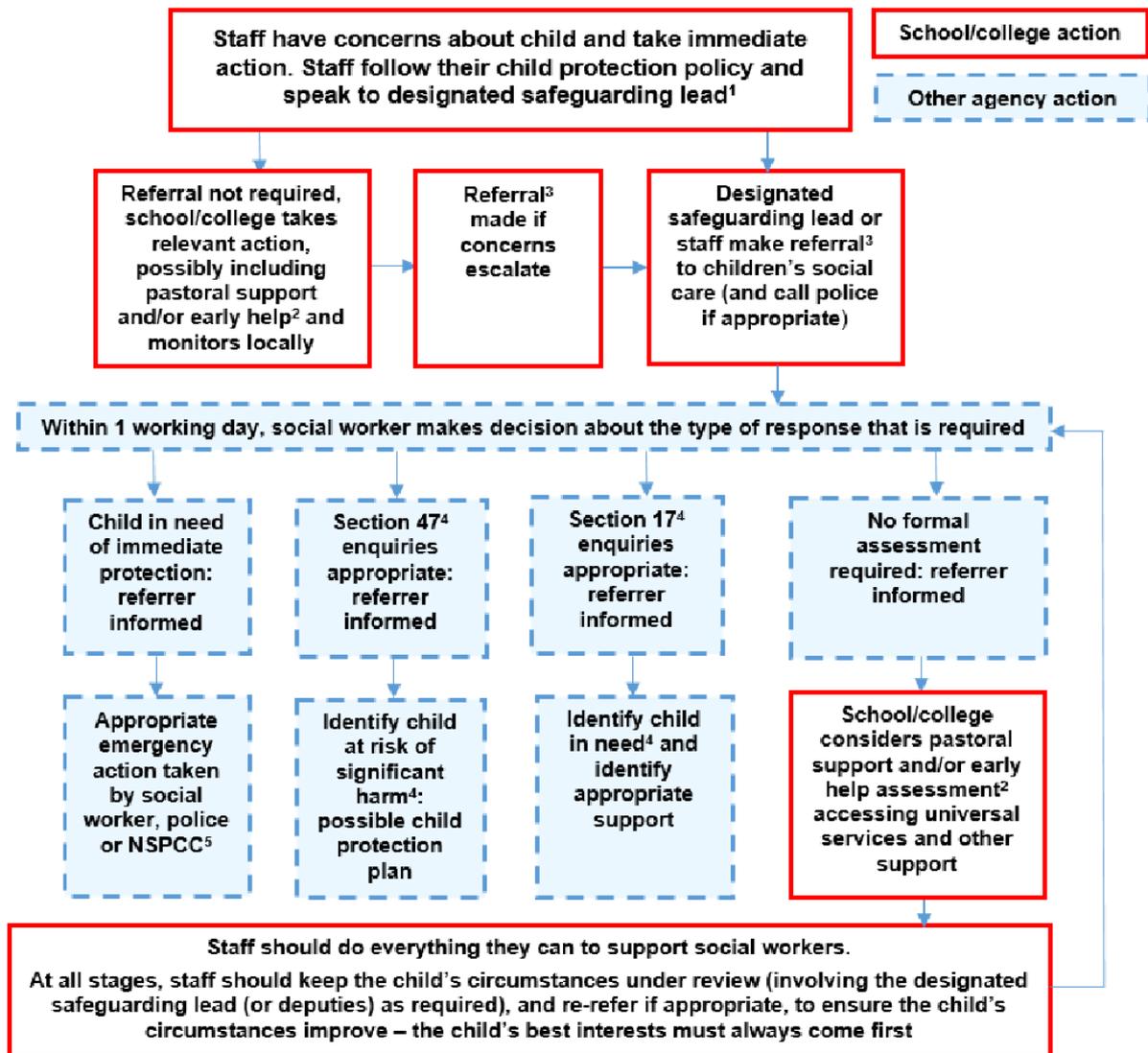
During Nursery sessions staff/students are not permitted to keep their mobile phone on their person, mobile phones are to be stored in a drawer or cupboard (on silent mode and preferably with a personal PIN lock) along with the person's personal possessions. Urgent calls may come via the Nursery office landline or Prep-School office landline. At the times when the Pre-Prep Class teacher uses twitter to communicate Pre-Prep Class activities a mobile phone may be used.

The Nursery mobile phone is to be used by staff in an emergency situation or to take incoming calls from parents regarding an alteration to their child's collection arrangements (there is no camera/video facility on the Nursery mobile phone).

Each classroom in Nursery and Pre-Prep has ipads to be used for taking photographs of the children for their Tapestry learning journal records etc. This equipment is stored securely when not in use and must not be used outside the setting.

Whilst parents and carers are in the Nursery indoor area or outdoor play area, we politely request that their mobile phones are not used.

Appendix A - Actions where there are concerns about a child



Appendix B - Covid 19 (Note – these requirements are under regular review)

- See – [Safeguarding Covid-19](#) (published to school website – Policies and Procedures) This document details additional safeguarding measures that are in place during any period of school closure or for the conduct of remote learning.
- In line with the DfE’s supplementary safeguarding Guidance, Burgess Hill Girls has reviewed safeguarding procedures to ensure that they remain effective while changed circumstances apply to schools.
- Designated Safeguarding Lead and Deputy Designated Safeguarding Leads may be contacted at any time during periods of closure, remote working or modified school opening using the numbers and email addresses set out in the Safeguarding Policy.
- All existing policies and arrangements for online learning, acceptable use and use of social media and the internet apply.
- The school has put in place mechanisms to support and maintain contact for those pupils who may not be able to return to school.
- Every effort will be made to ensure that training is current and up-to-date for safeguarding leads and staff safeguarding training and induction will continue as normal during the period of modified school operations.
- The school is guided by the advice presented in [Safeguarding and Remote Education](#) when setting up and using school email accounts and linking resources to ensure safe remote learning.

Appendix C – Designated Safeguarding Lead and Deputies – Job Description

The Designated Safeguarding Lead (DSL):

- is a member of the school senior leadership team
- takes lead responsibility for safeguarding and child protection for the whole school
- takes lead responsibility for arrangements to ensure online safety
- is afforded the additional time, funding, training and support required to carry out the role effectively
- provides advice and support to other staff on welfare, safeguarding and child protection matters
- is available during school hours during term time for staff to discuss any safeguarding concerns
- will ensure adequate and appropriate cover arrangements for out of hours or out of term time provision or activities including for boarders and the nursery

The Deputy Designated Safeguarding Leads (DDSLs):

- are trained to the same level as the Designated Safeguarding Lead
- are available during school hours during term time to deputise for the Designated Safeguarding Lead if they are unavailable

Specific duties:

- The DSL will refer cases of suspected abuse and neglect to the local authority social care and support other staff who may make referrals
- The DSL will refer radicalisation concerns to the Channel programme as required and support other staff who may make referrals
- The DSL, with the Head, will refer a person who is dismissed or left due to risk or harm to a child to the Disclosure and Barring Service as required and, if a crime may have been committed, to the Police.

Communication, management and information sharing:

- Act as a source of support, advice and expertise for all staff on all matters of safety, safeguarding and welfare including online and digital.
- Act as a point of contact with safeguarding partners
- Liaise with the head to inform him or her of issues relating to ongoing enquiries or police investigations including the requirement for children to have an 'Appropriate Adult'

- Liaise with the case manager and LADO for concerns relating to a staff member
- When making a referral, liaising with the relevant agencies to ensure that children's needs are considered holistically
- Ensure support for mental health needs when linked to a safeguarding concern
- Promote supportive engagement with parents and carers to promote the safety and welfare of children including when families may be facing challenging circumstances
- Work with senior leaders to mitigate the impact of safeguarding and child protection issues on attendance, engagement and achievement
- Maintain up to date child protection files that are kept confidential and stored securely
- Ensure that records include clear and comprehensive summaries of concerns, details of follow up, resolution and notes of actions taken with decisions reached and outcomes
- Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- Ensure the school's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure the child protection policy is available publicly and parents know that 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, and help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

Training, Knowledge and Skills

The designated safeguarding lead and deputy designated safeguarding leads undergo training to provide them with the knowledge and skills required to carry out the role as required by KCSIE 2022 and set out in Annex C. This training is updated at least every two years. The designated safeguarding lead and deputy designated safeguarding leads undertake Prevent awareness training.