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Responsible for Initiating Review of Policy	Governors with oversight DSL and Deputy DSLs
Committee to Review	Senior Leadership Team
Last Review Date	September 2026
Review Period	Annual (or when required)
Approved by (Committee and Date)	Senior Leadership Team – September 2026
Approved by Board of Governors	Autumn Term 2026
Effective Date of Policy	September 2026
Next Review Date	September 2027
Related Policies	7e Staff Code of Conduct 7h Sex and Relationship Education Policy 7h(i) Sex and Relationships – Preparatory School 7i Confidentiality Policy 7j Restraint Policy 9c Behaviour Overarching Policy 10a Anti-bullying 11a Health and Safety 32 Online Safety Policy 32d ICT Acceptable use Policy 32f IT Code of Conduct - Students Safeguarding code of conduct for visitors and contractors. Staff Handbooks – Guidance on Staff Pupil Relationships

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INTRODUCTORY NOTE

This Policy is designed to meet the school's obligations under the Education (Independent School Standards) Regulations 2019 ("ISSRs"), the National Minimum Standards for Boarding Schools 2023 (where applicable), and the Statutory Framework for the Early Years Foundation Stage (where applicable). All of these require schools to have arrangements in place to safeguard and promote the welfare of children in the school.

Paragraphs 7 and 8 of the ISSRs state that arrangements to safeguard and promote the welfare of pupils at the school (including boarders where applicable) must have regard to any guidance issued by the Secretary of State. The Department for Education ("DfE") guidance to which schools must have regard to is:

- Keeping Children Safe in Education (September 2026) ("KCSIE")
- KCSIE incorporates the additional statutory guidance, Disqualification under the
- Childcare Act 2006 (September 2018)
- KCSIE also provides links to various toolkits and additional advice and support.
- Working Together to Safeguard Children (dated 2018 but updated in 2023) ("WT")
- WT refers to the non-statutory advice: Information sharing (July 2018)
- Prevent Duty Guidance: for England and Wales (April 2021) ("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)
- Relationships education, relationships, and sex education (RSE) and health education (September 2021).
- FOR SCHOOLS THAT ARE CHARITIES: The Charity Commission Guidance Safeguarding and protecting people for charities and trustees (June 2022)

Relevant documents all staff must have read:

All staff, even those who do not directly work with children must read and understand part one of KCSIE in full.

- Staff Code of Conduct
- Safeguarding and Child Protection Policy
- School's Behaviour Policy
- School Policy for Children Missing Education

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Burgess Hill Girls operates a culture of vigilance. Safeguarding is everyone's responsibility and all staff are expected to maintain an attitude that 'it could happen here'. Concerns will always be taken seriously and acted upon promptly in the best interests of the child

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child. Staff should share any concerns they have about a child with the DSL. However, it should be remembered 'that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful'...This should not prevent staff from having a professional curiosity and bringing to the attention of the DSL'.

POLICY STATEMENT

This policy applies to Burgess Hill Girls (The School), which includes the EYFS setting. This policy is reviewed annually and updated in response to changes in statutory guidance (updated annually as a minimum). This policy is available on the school website. The link is checked regularly to ensure accessibility. Printed copies are available on request.

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (September 2026) ("KCSIE")
- KCSIE incorporates the additional statutory guidance Disqualification under the
- Childcare Act 2006 (September 2018)
- KCSIE also provides links to various toolkits and additional advice and support. Working Together to Safeguard Children 2023
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- The use of social media for on-line radicalisation (July 2015)
- Relationships, education, relationships, and sex education (RSE) and health education (September 2021).
- The Charity Commission Guidance Safeguarding and protecting people for charities and trustees (June 2022)
- DFE Data Protection Guidance for Schools

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This policy also takes into account the procedures and practice of West Sussex County Council as part of the inter-agency safeguarding procedures set up by the West Sussex Safeguarding Children Partnership.

A Listening School

All children at the school, regardless of their age, have an enormous support network around them. They have a significant number of people to whom they can turn at any time. These include the teaching staff, tutors, coaches, boarding staff, teaching assistants, nursery practitioners, school nurse, school officers and the safeguarding team. The Senior School children and the boarding community also have access to an Independent Listener.

Younger children would be encouraged through play or drawings to express their feelings.

All staff are committed to giving the children in our care the time and space that they need and understand that non-judgmental listening is an important skill to master when working with children. Knowing what to say and when, can make all the difference in the world to a child who is struggling to open up. Safeguarding children is at the heart of everything we do.

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KEY CONTACT DETAILS

Designated Safeguarding Lead "DSL"	Lead DSL Suzanne Roberts TEL: 01444 241050 EMAIL: Suzanne.roberts@burgesshillgirls.com
Deputy Designated Safeguarding Leads "DDSL"	Deputy DSL Nikki Donson TEL: 01444 241050 EMAIL: Nicola.donson@burgesshillgirls.com Deputy DSL Iain Regan-Smith TEL: 01444 241050 EMAIL: iain.regan-smith@burgesshillgirls.com Deputy DSL Sue Collins TEL: 01444 241050 EMAIL: Sue.collins@burgesshillgirls.com Deputy DSL (Nursery only) Nicole Parker TEL: 01444 241050 EMAIL: Nicole.parker@burgesshillgirls.com
Designated Teacher for Looked After Children	Heather Cavanagh TEL: 01444 241050 EMAIL: Heather.cavanagh@burgesshillgirls.com
Head	Heather Cavanagh TEL: 01444 241050 EMAIL: Heather.cavanagh@burgesshillgirls.com

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Chair of Governors	Dr Simon Thornton-Wood Email: mr.thornton-wood@bhsfg.com
Nominated Safeguarding Governor	Miss Beth Gavin Email: Bursar@burgesshillgirls.com
Local Authority Designated Officer	Miriam Williams & Donna Tomlinson TEL: 03302 223339 EMAIL: LADO@westsussex.gov.uk
Local Authority Children's Social Services	TEL: 01403 229900 EMAIL: WSChildrensServices@westsussex.gov.uk OUT OF HOURS EMERGENCY DUTY TEAM TEL: 033 022 6664
Multi-Agency Safeguarding Hub	TEL: 01403 229900 EMAIL: WSChildrensServices@westsussex.gov.uk
Support and Advice about Extremism	Police TEL: 101 Ext. 531355 EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 EMAIL: prevent@sussex.pnn.police.uk
Local Authority West Sussex Channel Panel Chair	Beverly Knight, Community Safety and Wellbeing, WSCC TEL: 0330 222 4223 EMAIL: beverly.knight@westsussex.gov.uk PREVENT LEAD: Beverly Knight
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A NH TEL: 0808 800 5000 EMAIL: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk

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Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbb.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: concerns@isi.net

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PROCEDURES AND GUIDANCE



CHILD PROTECTION AND SAFEGUARDING IN OUR SCHOOL



WHAT DOES IT MEAN?

Our school is committed to safeguarding and promoting the **physical, mental and emotional welfare of every pupil**, both inside and outside of the school premises.

'Child protection and safeguarding' are defined as protecting pupils from maltreatment, preventing the impairment of their mental and physical health or development, and ensuring that pupils grow up with the provision of safe and effective care. Everyone who works at the school must be aware of our safeguarding procedures, which are in line with the Department for Education's guidance, 'Keeping children safe in education' (KCSIE).

OUR ARRANGEMENTS

The designated safeguarding lead (DSL) offers safeguarding advice and ensures the correct procedures are followed.

Our school's DSL is:
Mrs Suzanne Roberts

Our deputy DSLs are:
Miss Nicola Donson
Mrs Sue Collins
Mr Iain Regan-Smith

KEY SAFEGUARDING ISSUES

Abuse: the maltreatment of a child. This can be physical, emotional, or sexual abuse and/or neglect.

Child-on-child abuse: e.g. bullying. This also includes abuse in personal intimate relationships, known as 'teenage relationship abuse'.

Child sexual exploitation (CSE) and child criminal exploitation (CCE): where somebody takes advantage of, or threatens, a child to make them take part in sexual or criminal activity.

Modern slavery: where a child is forced into slavery or servitude.

Extremism: the active opposition to fundamental British values.

Radicalisation: the support for the ideologies of terrorist groups.

'Honour'-based abuse: crimes committed to protect or defend the honour of a family or community, e.g. female genital mutilation (FGM) and breast ironing.

On-line Safety:
Content – e.g. racism, self harm, misogyny...
Contact – e.g. Grooming...
Conduct – e.g. On line Bullying...
Commerce – e.g. On line Gambling...

WHAT TO DO

If a pupil discloses concerns to you, you should:

- Treat them with respect and dignity.
- Reassure them that they are being taken seriously.
- Make notes and make sure the discussion is recorded in the pupil's own words.
- Make sure they know what will happen next.

INDICATORS OF ISSUES

The following may be indicators that a pupil is facing safeguarding issues (this is not an exhaustive list):

- **Changes in behaviour,** views, concentration and/or mood.
- **Unexplained weight loss.**
- **Unexplained injuries** and bruising.
- **Signs of self harm.**
- **Changes in friendships** and relationships e.g. suddenly spending time with older individuals or groups.
- **Increased absence** from school or **going missing.**
- A significant decline in academic engagement and/or performance.
- **Unexplained gifts or new possessions.**
- Displaying an unwillingness to take part in or get changed for PE.
- **Substance abuse.**

THE PREVENT DUTY

All schools are **subject to a duty** to 'prevent people from being drawn into terrorism'. This is the **Prevent duty**, which forms part of the school's safeguarding obligations. Where radicalisation concerns arise, the school may make a referral to the **Channel programme**, which helps people who are vulnerable to being radicalised.

REPORTING YOUR CONCERNS

If a pupil discloses concerns to you, you have a **responsibility to report it via MyConcern**. The safeguarding team will triage the concern and decide the next step. Speak to the DSL or a deputy DSL immediately if you believe a child is at risk of immediate or significant harm so that a referral to children's social care and/or call the police can be actioned. If you have a concern about a staff member, volunteer or visitor at the school, **report it to the head teacher** as a matter of urgency. If the concern is about the head teacher, speak to the DSL.

Teachers have a legal duty to report the discovery of FGM on a child under 18 to the police. Remember: **no concern is too small** and may be part of a wider issue.

MORE KEY SAFEGUARDING ISSUES

County lines: the activity of organised groups transporting illegal drugs across the country. Children may be coerced into committing this sort of crime.

Homelessness: being without, or the risk of being without, a home. This includes children who have been told or forced to leave their home.

Drug and alcohol abuse: taking and/or abusing substances both legal and illegal.

Youth-produced sexual imagery: the consensual or non-consensual creation or sharing of nude or semi-nude images and/or videos.

Forced marriage: marriage entered into without the full or free consent of one or both parties, and may include coercion, threats and/or violence.

CONCERNS ABOUT A CHILD

The school has a duty to consider at all times the best interests of the child and take action to enable all children to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements via the pastoral system and safeguarding team for listening to children and providing early help.

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DEFINITIONS OF SAFEGUARDING AND TYPES OF ABUSE

Safeguarding and promoting the welfare of children is defined as;

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- And, taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child.

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils. "Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation." (KCSIE2026)

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- Physical abuse
- Emotional abuse
- Neglect
- Sexual abuse

(PENS)

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

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PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

Safeguarding is everyone's responsibility.

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The Governors of Burgess Hill Girls recognise the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data (Use and Access) Act 2025 (DUAA) and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL"). If the DSL or any of the deputy DSLs are not available, staff should speak to a member of the SLT and/or take advice from local children's social care. The DSL should be informed as soon as possible.

Governors of Burgess Hill Girls will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data.'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child at risk.
- not providing pupils' personal data where the serious harm test is met.



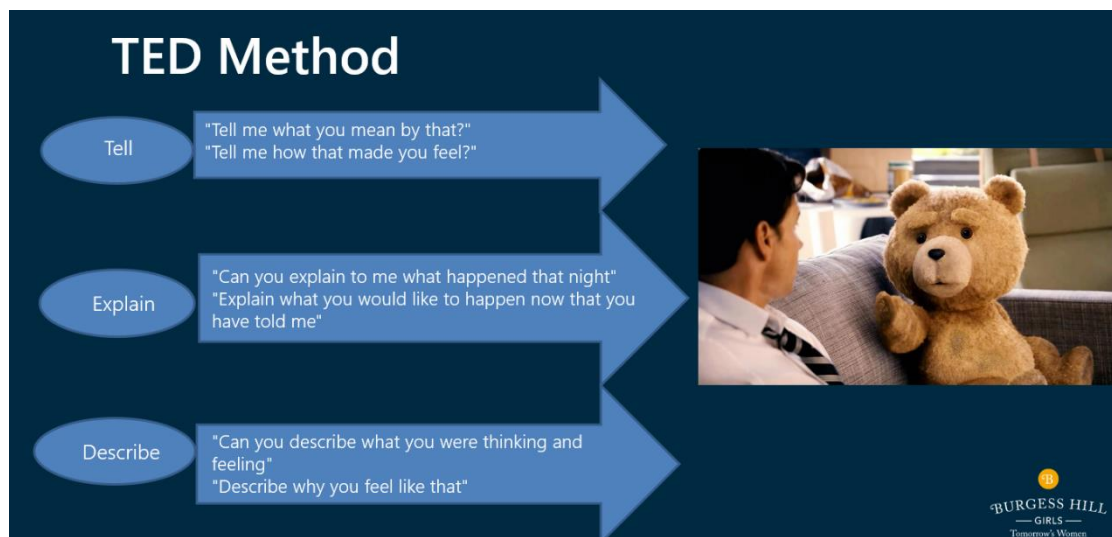
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All
staff



should:

- listen carefully using the TED method.
- avoid asking leading questions.
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe.
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report.
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns.
- determine how best to build trusted relationships with children and young people which facilitate communication.

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing on MyConcern. Staff are encouraged to make notes at the point of disclosure to ensure accurate and relevant information is recorded. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The information is kept confidential and stored securely, ensuring that the information is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of KCSIE.

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Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

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. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the pupil/s at their heart.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early Help

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

- Has a disability or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from care or from home.
- Is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking, or sexual or criminal 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.

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- Is at risk of being radicalised or exploited.
- Has a family member in prison or is affected by parental offending.
- Is experiencing or is at risk of experiencing family ostracism.
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child.
- Is persistently absent from education, including persistent absences for part of the school day.
- Children who have experienced multiple suspensions are at risk of being permanently excluded.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Early help is support which improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the relevant Local Authority referral threshold document and local Family Help arrangements. The DSL will support staff in liaising with external agencies and professionals as part of a multi-agency assessment where appropriate.

If early help, including support through universal services, community-based early help or targeted Family Help, is appropriate, the matter will be kept under review. Consideration will be given to a referral to children's social care if the pupil's situation does not appear to be improving or if the level of concern increases.

What staff should do if they have concerns about a child?

If staff (including governors, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action. This may include consideration of support through universal services, community-based early help, targeted Family Help services or, where appropriate, a referral to children's social care, although staff can make a direct referral to children's social care. 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; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded on MyConcern.

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What staff should do if a child is in danger or at risk of harm?

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should speak to the DSL immediately and then make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded on MyConcern.

What staff should do if a child is seen as at risk of radicalisation?

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submit a referral form to MASH/IFD or call them directly. Advice and support can also be sought from children's social care.

What staff should do if they discover an act of Female Genital Mutilation ("FGM") Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

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, log the concern on MyConcern and speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

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How should staff respond to an incident of nudes and semi-nudes being shared by pupils?

All members of staff in an educational setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop, which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions (TED method), in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible. The DSL will follow the department for Digital Culture, Media & Sport (DDMSC) / UK Council for Internet Safety (UKIS) guidance titled "Sharing nudes and semi-nudes: advice for education settings working with children and young people published on March 11, 2024, when responding to a report of sharing nudes and/or semi-nudes.

This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the child unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social

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care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

Filtering and Monitoring:

The DSL is responsible for ensuring the school, through the Head of IT, has effective filtering and monitoring systems in place. Staff have regular training along with cyber-security. Filtering and Monitoring is also a consideration in any risk management plans for vulnerable children.

- Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include:
 - Physical monitoring
 - Live software monitoring
 - Monitoring user logs
 - Monitoring individual devices
- We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures.

The DSL, IT Team, and Governing body will ensure filtering & monitoring systems are reviewed at least annually to ensure effectiveness and are appropriate to the schools safeguarding needs.

- The Governing Body receives regular assurance regarding the effectiveness of filtering and monitoring systems.
- The Lead DSL and IT Manager receive weekly monitoring and monthly filtering reports which are analysed and any queries raised in a timely manner. These reviews ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.
- All our staff undertake training to understand the risks of poor filtering and monitoring and know how to share their concerns.
- All our staff take part in annual cybersecurity training as part of their safeguarding responsibilities. This includes understanding the risks of poor filtering and monitoring, recognising signs of online abuse, and knowing how to report concerns.

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Out-of-school Providers:

Whilst the provider is responsible for their own safeguarding and child protection policies and procedures, the school may refer any concerns they have about the provider to the local authority. The School will follow its own safeguarding and child protection procedures where they have concerns about the out-of-school provider. This may include contacting the local authority designated officer in the case of concerns about adults.

The School will ensure providers on their premises meet the guidance in 'Keeping Children Safe during community activities, after-school clubs and tuition' (DfE, 2023).

Private Fostering:

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery. Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the Local Authority. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Mental Health:

All staff at Burgess Hill Girls are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.

Gender Questioning Pupils

The school recognises that some pupils may be questioning their gender and that such pupils may, in some circumstances, experience vulnerability, distress, bullying, social isolation, mental health difficulties or other safeguarding concerns.

When considering how best to support a gender-questioning pupil, the school will place the safeguarding, welfare and best interests of the child at the centre of all decision-making. The school will consider each case individually and undertake an appropriate risk assessment where required, taking into account the pupil's age, developmental stage, needs, views, circumstances and any associated safeguarding concerns.

Decisions regarding support arrangements will be made on a case-by-case basis and will involve relevant members of staff, including the Designated Safeguarding Lead and, where appropriate, other pastoral, wellbeing and SEND staff. The school will keep arrangements under review and adapt support in response to the pupil's changing needs and circumstances.

The school recognises the important role of parents and carers in supporting children and will seek to work in partnership with them unless there is a reason to believe that doing so may place the child at risk of harm or compromise their welfare. Any decision not to involve parents or carers will be considered carefully, recorded appropriately and reviewed regularly.

Further information regarding the school's approach to supporting pupils' emotional wellbeing and mental health can be found in the Student Wellbeing Policy. The School will have regard to any current Department for Education guidance relating to gender questioning children.

What staff should do if a child goes missing/absent from education?

Children, who go missing/absent from education unexplainable and/or persistent absences, can be a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. The School's procedures for unauthorised absence and for dealing with children who go missing from education are contained in the school's Children Absent in Education Policy.

Where reasonably possible, the School will hold more than one emergency contact number, in addition to the pupil's parent(s)/guardian(s), for each pupil, to provide the School with additional

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options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

The School will report to the relevant Local Authority a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

What to do if a child absconds from school

Abscond: to leave without permission.

The Health and Safety at Work Act, 1974, and in common law, schools owe a duty of care towards their students. This duty of care requires that all reasonable steps are taken to ensure that pupils are safe and remain within the care of the school at all times throughout the school day and during school-led activities.

In the event that a pupil leaves school without permission, every attempt should be made to contact the parents/carers to advise them that their child/young person has absconded from school. When parents/carers are contacted, it should be made clear that the responsibility for their child/young person is being passed back to them.

Staff will not follow or chase after a child/young person that has absconded as this could potentially make the situation worse, risking endangerment to life to the child/young person and/or staff.

What staff should do if a child needs a social worker? (Children in Need and Child Protection Plans)

At Burgess Hill Girls we recognise that where children need a social worker it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, behaviour and poor mental health. This knowledge should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

What staff should do if a child requires mental health support?

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils. See student Wellbeing Policy.

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Staff can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support schoolteachers to promote positive health, wellbeing, and resilience among young people.

What staff should do if they have safeguarding concerns about another staff member?

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at the West Sussex LADO office, LADO@westsussex.gov.uk. See Low Level Concerns Policy

What staff should do if they have concerns about safeguarding practices in the School?

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the school's Whistleblowing Policy. 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 concerns internally or believe their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child on child abuse (including harassment and violence) is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online.

It can manifest itself in many ways and may include:

- abuse within intimate partner relationships
- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- abuse within intimate partner relationships between peers
- physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing

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- physical harm), initiation/hazing type violence and rituals
- Up-skirting, sexting
- consensual and non-consensual sharing of nudes and/or semi-nudes
- sexual assault
- gender-based issues
- sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- it can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future.

The School takes a zero-tolerance approach, and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child-on-child abuse and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

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The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children through the SENCO.

The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

The School takes the following steps to minimise the risk of child-on-child abuse.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

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 relevant Local authority on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all children involved including the alleged victim and perpetrator(s). If it is necessary for a child to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the relevant local authority, 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 relevant local authority and/ or the police as appropriate. The School will have regard to the procedures set out in KCSIE and the Sexual violence and sexual harassment between children guidance (SVSH) at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider that parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed.

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Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours, which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL/DDSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the child and appropriate specialist support offered. The DSL/DDSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the Sussex Child protection and Safeguarding partnership's referral process.

The School's approach to sexting (making or sharing of nudes or semi-nudes) is clear that it is not allowed, covered by the behaviour policy and the online safety policy. All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether they are consensual or non-consensual.

The School will follow the UKCIS Guidance "Sharing nudes and semi-nudes" (March 2024) and the NCA/CEOP/IWK Guidance on AI-Generated Child Sexual abuse material (June 2025) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by a DSL and support from external agencies will be sought as appropriate.

When there is a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim.
- whether there may have been other victims.
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded on MyConcern (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the

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impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.

The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL/DDSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record on MyConcern of all concerns, discussions and decisions made.

The School will reflect and note any lessons learned on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors.

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At Burgess Hill Girls we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the Head without delay; any concerns about the Head should go to the Chair of Governors.

Any concerns about the conduct of a member of staff, supply teachers, volunteers, governors or contractors should be reported to the Head.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Head has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations.

It is an allegation if the person* has:

- behaved in a way that has harmed a child or may have harmed a child and/or.
- possibly committed a criminal offence against or related to a child and/or.
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers, governors and contractors.)

Allegations should be reported to the LADO 'without delay' via the online portal: socialcareportal.westsussex.gov.uk.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

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1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the Head/DSL (the case manager). If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head or DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head or DSL is the subject of the allegation or concern, the Head or DSL must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing on MyConfide, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.
3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
 - redeployment within the School so that the individual does not have direct contact with the child or children concerned.
 - providing an assistant to be present when the individual has contact with children.
 - redeploying to alternative work in the School so the individual does not have unsupervised access to children.
 - moving the child or children to classes where they will not come into contact with the member

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of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made clear that this is not a punishment and parents have been consulted.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, WT and KCSIE when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made and liaise with the Assistant Head Pastoral and Boarding.
7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

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10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the

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individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in MyConfide in accordance with KCSIE and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business. The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

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The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD) = LOW LEVEL CONCERN

A low-level concern is any concern 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; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. 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 (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

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The School has a separate Low-Level Concerns Policy and a reporting system, MyConfide, which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's Low-Level Concerns Policy can be found in Staff handbooks and on the school's website. The aim of the Staff code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The procedure for sharing confidentially with any such concerns is set out in the Low-Level Concerns Policy. The Head is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Head immediately so that they can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded on MyConfide in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All Low-Level concerns will be record on MyConfide. The record will include;

- Name of the individual sharing their concerns
- details of the concern,
- the context within which the concern arose,
- details of the action taken.

*The name of the reporting individual is recorded, should they have asked to remain anonymous,

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this will be respected as far as reasonably possible.

The information will be retained for six years or until the individual has left employment, whichever is longer.

- All low-level concerns should be recorded in writing.
- Records must be kept confidential, secure and compliant with data protection laws.
- Records should be reviewed to identify patterns of inappropriate, problematic or concerning behaviour

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head/DSL will consult with the LADO and take a more collaborative decision-making approach.

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A 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

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Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff and volunteers to work with children and young people are set out in the School's Safer Recruitment Policy.

The school will ensure that appropriate safeguarding checks are undertaken in accordance with current legislation and guidance, including determining whether a role constitutes regulated activity relating to children. The school recognises the importance of correctly identifying posts that are eligible for enhanced DBS checks, including checks of the children's barred list where appropriate.

The school will regularly review its safer recruitment procedures, recruitment practices and Single Central Record (SCR) arrangements to ensure ongoing compliance with statutory requirements and safeguarding guidance. Governors and senior leaders will maintain oversight of these arrangements and take action to address any issues identified through monitoring, audit or review processes.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and are informed about our 'Away for the Day' 'mobile phone policy, 'Never Seen, heard or used' and are instructed to keep devices on silent and out of sight whilst on the school grounds.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

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

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised - see Visiting Speaker Policy.

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The School's procedures for managing contractors attending the School site - see contractors Policy and in the safeguarding, information given when contractors sign in.

MANAGEMENT OF SAFEGUARDING

The School's DSL is a member of the senior leadership team (SLT). The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL directly line manage the DDSLs who, together with the DSL, undertake the day-to-day work of safeguarding the pupils and staff. The DSL and DDSLs contact details can be found on the Key Contacts page at the start of this policy.

The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the Head, SLT and the Governors to review and update the School's safeguarding policy and procedures.

Where a pupil leaves the School, including for in-year transfers, the DSL/DDSLs will also ensure their child protection file is transferred to the new school (separately from the main pupil file) and electronically if the new school uses MyConcern, 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. The DSL/DDSLs will ensure secure transit and obtain confirmation of receipt.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL & DDSLs regularly review the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL/ DDSLs will always be available in person (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted by email and Mobile telephone. For out-of-hour-of-term activities a member of the SLT is on call and they can contact the DSL/DDSLs. The Nursery operates 51 weeks of the year and has a DSL/DDSL on site at all times.

The DSL and DDSLs liaise with WSCS on a termly basis and with other agencies when required. The

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DSL or DDSLs will also work in line with WT. “NPCC - *When to call the police*” guidance to assist the DSL or DDSLs understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL and DDSLs should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

The Governing Body retains strategic oversight of safeguarding. The Head is responsible for ensuring safeguarding arrangements are effectively implemented. The DSL holds lead responsibility for safeguarding and child protection matters.

TRAINING

Induction and training are in line with advice from the West Sussex Safeguarding Children Partnership and safeguarding partners which are; Local authority children services, Police and Clinical commissioning groups.

All Staff

All new staff will be provided with induction training that includes:

- the child protection safeguarding policy (including the policy and procedures to deal with child-on-child abuse);
- the role and identity of the DSL and DDSLs;
- the behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the staff code of conduct including the School’s whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media and the school’s Online Safety Policy.
- the safeguarding response to children who go missing or are absent from education;
- a copy of Part one of KCSIE
- School leaders and staff who work directly with children will also be required to read Annex B of KCSIE (and Part five of KCSIE).

Copies of the above documents are shared with all staff during induction.

All staff are also required to:

All staff, including those who do not work directly with children, must read and understand Part One of KCSIE and confirm that they have done so. Each time Part one of KCSIE is updated by the Department for Education, staff will be updated on the changes via Staff inset and email.

- Understand key information contained in Part one of KCSIE. The School will ensure staff understanding through staff training, insets and Safeguarding bulletins.

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- Receive training in safeguarding and child protection regularly, in line with advice from West Sussex Safeguarding Children Partnership and safeguarding partners. Training will include online safety and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails, e-bulletins, and staff meetings.

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

Governors of Burgess Hill Girls are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention.

DSL & DDSLs

The DSL and deputies undertake training consistent with local safeguarding partnership requirements and update their knowledge and skills regularly, at least annually, and whenever there are significant changes in safeguarding guidance to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, West Sussex Safeguarding Children Partnership and safeguarding partners training to Prevent duties and harmful sexual behaviours, training on online harms, Misinformation, disinformation and Conspiracy theories to support pupils understanding of the world, mental health and safety. Further details of the required training content for the DSL are set out in Annex B of KCSIE.

In addition to their formal training, the DSL & DDSLs' knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support

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the DSL & DDSLs in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSL.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

The School considers its obligation to review safeguarding practices as a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. The DSL, with support from the DDSLs, will undertake a review of Safeguarding policies at the end of each academic year to be reviewed and agreed by the SLT and the Governing Board in line with KCSIE updates. The School draws on the expertise of staff, including the DSL & DDSLs, in shaping the School's safeguarding arrangements and policies.

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe:

The Governors of Burgess Hill Girls ensure that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet, and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The school recognizes the risks posed by online misinformation, disinformation and conspiracy theories. Staff are trained to identify and respond to these risks, particularly where they may impact a child's understanding of the world, mental health or safety. The curriculum includes age-appropriate education on critical thinking and digital literacy to help pupils navigate online content safely. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed. Reference is made to the 4Cs: Content/Contact/Conduct/Commerce. Internet safety (including

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when children are online at home) is included in the Prep School and Senior School's ICT curriculum and bespoke lessons are taught across both schools. Also see Acceptable User Policy.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. These systems will be reviewed periodically. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images. The School recognises however that sixth form students have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that they may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. Further details of the School's policy and procedures in relation to online safety can be found in the School's ICT acceptable user policies, staff and students. In addition, the mobile phone and devices "away for the day" policy and privately owned devices policies.

Relationships Education AND/OR Relationships and Sex Education ("RSE")

Relationships Education AND/OR RSE are compulsory and forms part of the School's PSHE programme. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for misogyny, harmful attitudes, sexual harassment and violence against women & girls (VAWG).

The School will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching Relationships Education AND/OR RSE.

Arrangements for visiting speakers.

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information 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.

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,

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the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided. The School shall also keep a formal register of visiting speakers.

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare.

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

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 LADO when appropriate.

Use of mobile phones and cameras

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Acceptable Use Policy and the Mobile Phone and Devices Policy. No mobile phones or devices with cameras may be used in the nursery or prep school without the expressed permission of the Nursery manager/ Assistant Head - Prep School.

Parents and staff are not permitted to use their personal mobile phones, camera or any electronic device with imaging and sharing capabilities in or around the EYFS setting without prior approval from the Nursery Manager or Assistant Head - Prep School.

Smart Glasses and Wearable Recording Devices: Students, Parents, carers, visitors and staff must not wear smart glasses or any other wearable technology capable of taking photographs, recording video, or capturing audio whilst on school premises. This measure is in place to protect the privacy, safety and welfare of all members of the school community.

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DSL for the EYFS

The DSL has overall responsibility for safeguarding across the school including EYFS. In addition the Deputy Nursery Manager is a deputy DSL who will take lead responsibility for safeguarding EYFS children in the absence of the Nursery Manager.

Duty to notify Ofsted/Independent Schools Inspectorate

The School will inform Ofsted of any significant event, which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

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APPENDIX 1 – SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL or DDSLs.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSLs, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL or DDSLs.

Abuse: a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and



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limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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. 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; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and

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videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); 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. Further information can be found in the Sexual violence and sexual harassment between children (SVSH) advice.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-Child abuse: Children can abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. (Reference KCSIE 2024 paragraph 24)

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. (Reference KCSIE 2024 paragraph 26)

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into Schools. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or School. Further information can be found in the SVSH advice.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ age difference, 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.

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Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

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

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serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children with unexplainable and/or persistent absences from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16- and 17-year-olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE 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.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation

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can occur without any of these issues.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

The below CSE indicators can also be indicators of CCE:

Having prior experience of neglect, physical and/or sexual abuse;

- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in Child sexual exploitation: Definition and a guide for practitioners (DfE 2017). CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and

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their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Potential vulnerabilities include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/ sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse. Children who have been exploited will need additional support to help maintain them in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug

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debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims (May 2022)".

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

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Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local police. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk.

Online Safety Risks

The school recognises that advances in artificial intelligence (AI) present both opportunities and safeguarding risks.

Children may be exposed to harm through AI-generated content including deepfakes, AI-generated sexualised images, nudification technology, manipulated videos, impersonation, online scams, misinformation, disinformation, conspiracy theories and other forms of synthetic media.

The school recognises that AI-generated content may be used to facilitate bullying, harassment, child-on-child abuse, sexual exploitation, coercion, extortion, grooming and reputational harm. Creating, sharing or possessing AI-generated sexualised images of children will be treated as a safeguarding concern and managed in accordance with this policy, the Online Safety Policy and Child-on-Child Abuse procedures.

The school educates pupils about the risks associated with AI-generated content and develops critical thinking and digital literacy skills to help them evaluate the authenticity and reliability of online content. We teach pupils about these new forms of misinformation (false information shared mistakenly) and disinformation (deliberately misleading information), fake news, and conspiracy theories, alongside the existing 4 C's of online Safety (content, contact, conduct, and commerce). Creating an environment where children feel comfortable asking questions and discussing the risks and benefits of the online world is crucial

All staff receive training in online safety issues including AI technologies, deepfakes, misinformation, disinformation and emerging online harms.

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Mental health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Victim

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSL.

The DfE 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 secondary and senior schoolteachers 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.

Honour- based abuse (HBA)

Encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

Female genital mutilation (FGM):

Refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

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Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- a visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM:

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (for example, withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

If staff are concerned that a pupil may be at risk of FGM, they should speak to the DSL or DDSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18.

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure

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whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

Further information can be found in the multi-agency statutory guidance on female genital mutilation and the FGM resource pack, particularly section 13.

Marriage: In accordance with The Marriage and Civil Partnership (Minimum Age) Act 2022, the age of consent for marriage in England is 18.

It is now an offence to cause a child under the age of 18 to enter a marriage in any circumstances, without the need to prove that a form of coercion was used, even with parental consent. This includes non-legally binding 'traditional' ceremonies which would still be viewed as marriages by the parties and their families. Any concerns that students may be getting married should be referred to the DSL immediately.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and Schools can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the multi-agency guidelines: Handling cases of forced marriage. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 70080151 or email fmu@fco.gov.uk.

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training in Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in

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need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles.
- intolerance of differences, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders in Schools should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL or the DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or School. For example, information that would allow the new school

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or School to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

At Burgess Hill Girls, we provide additional pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place, for example, regular one-to-one meetings with SENCo, a member of the SEND Team or their class/form tutor. Clubs such as "Sort your Stuff out". One-page profiles, which provide an opportunity to capture the voice of the child. More frequent meetings with parents. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bi or trans ("LGBTQIA+"): The fact that a child may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, children who are LGBTQIA+ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+. Risks can be compounded where children who are LGBTQIA+ lack a trusted adult with whom they can be open. The School endeavours to provide a safe space for LGBTQIA+ children to speak out or share their concerns with trusted members of staff.

Domestic abuse:

The Domestic Abuse Act 2021 (part 1). Defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16,

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who are 'personally connected' to each other:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- psychological, emotional or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. School staff can contact Operation Encompass, a national initiative that enables police to share information with schools about domestic abuse incidents: helpline :0204 513 9990, available 8am to 1pm, Monday to Friday, for advice in respect of children who have experienced domestic abuse. When notified, the DSL assesses the impact on the child and ensures appropriate support is provided.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children with unexplainable and/or persistent absences from education: Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need to have a

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least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - leave school to be home educated
 - move away from the school's location
 - remain medically unfit beyond compulsory school age
 - are in custody for four months or more (and will not return to school afterwards); or
 - are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority. *Further information can be found, in 'Working together to improve school attendance'*

<https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

A child absent from School is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'- based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent particularly persistently. All unexplained or persistent absences will be followed up.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbors, friends, and acquaintances); and by strangers.

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Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. It is important that advice focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

CONTACT WITH POLICE

- Contact with the Police and Criminal Evidence Act (PACE) (1984)
 - If the Police arrive unannounced at our school, they should always be directed to the Headteacher. If they are unavailable, they should be directed to the Deputy Head or Lead DSL.
 - Police officers, of any rank, should not be allowed into the school without the Headteacher/Assistant Headteacher or Lead DSL being aware. If Police are attending school to visit a pupil or group of pupils this is normally pre-arranged, and they will be met by the appropriate staff.
 - Under no circumstances should a pupil be collected to speak with the Police without the Headteacher/Assistant Headteacher or Lead DSL being aware. One of these people will organise the next steps.
1. There is a requirement for a child to have an Appropriate Adult present when they are in contact with the Police.
 2. An Appropriate Adult is 1. The parent or guardian 2. A social worker 3. Another responsible adult such as the DSL or Headteacher.
 3. The member of staff present will inform the Police Officer of any vulnerabilities known by the school, before they speak to a pupil.
 4. A record should be made on MyConcern of who spoke to the pupil (name and badge number), who else was present, date and time. If, having been informed of the vulnerabilities, the member of staff present does not feel that the Police Officer is acting in accordance with PACE, they should ask to speak with their supervisor or contact 101 to escalate their concerns.
 5. Where there are grounds to suspect someone of an offence, they must be cautioned before being questioned or asked further questions. If their answers or silence (i.e. failure or refusal to answer or answer satisfactorily) provide grounds for suspicion, this may be given as evidence to a court in a prosecution.

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6. A Police Officer must not caution a child or a vulnerable person unless the Appropriate Adult is present. If they are cautioned in the absence of the Appropriate Adult, the caution must be repeated in the Appropriate Adult's presence.
7. If the Police arrive at school with the intention to arrest a pupil, the Headteacher/Assistant Head or Lead DSL must ask for the rationale behind the arrest being made at school. School must always be seen as a safe place for children to attend but there may be reasons why the arrest is required to be made at school. The member of staff should feel confident to discuss this further with a senior police officer before agreeing to this taking place on the school site.
8. If they are unhappy with the rationale, they can object and ask for further consideration to be given to the appropriateness of this. They can also contact the WSCC Safeguarding in Education team for support and advice. Further information can be found in the Statutory guidance PACE Code C 2019 (accessible) - GOV.UK When to Call the Police - Guidance for Schools and Colleges will help staff understand when they should consider calling the police and what to expect, when they do.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. www.helpwithchildarrangements.service.justice.gov.uk The School may refer some parents and carers to this service where appropriate.

The Role of the Designated Safeguarding Lead:

The Designated Safeguarding Lead is responsible for safeguarding and child protection at Burgess Hill Girls. The key role of the Designated Safeguarding Lead is to:

- manage referrals from school staff or any others from outside the school;
- work with external agencies and professionals on matters of safety and safeguarding;
- undertake training;
- raise awareness of safeguarding and child protection amongst the staff and parents; and
- ensure that child protection information is transferred to the pupil's new school
- be aware of pupils who have a social worker
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff
- work with others to ensure that the school's filtering and monitoring systems are functional and effective



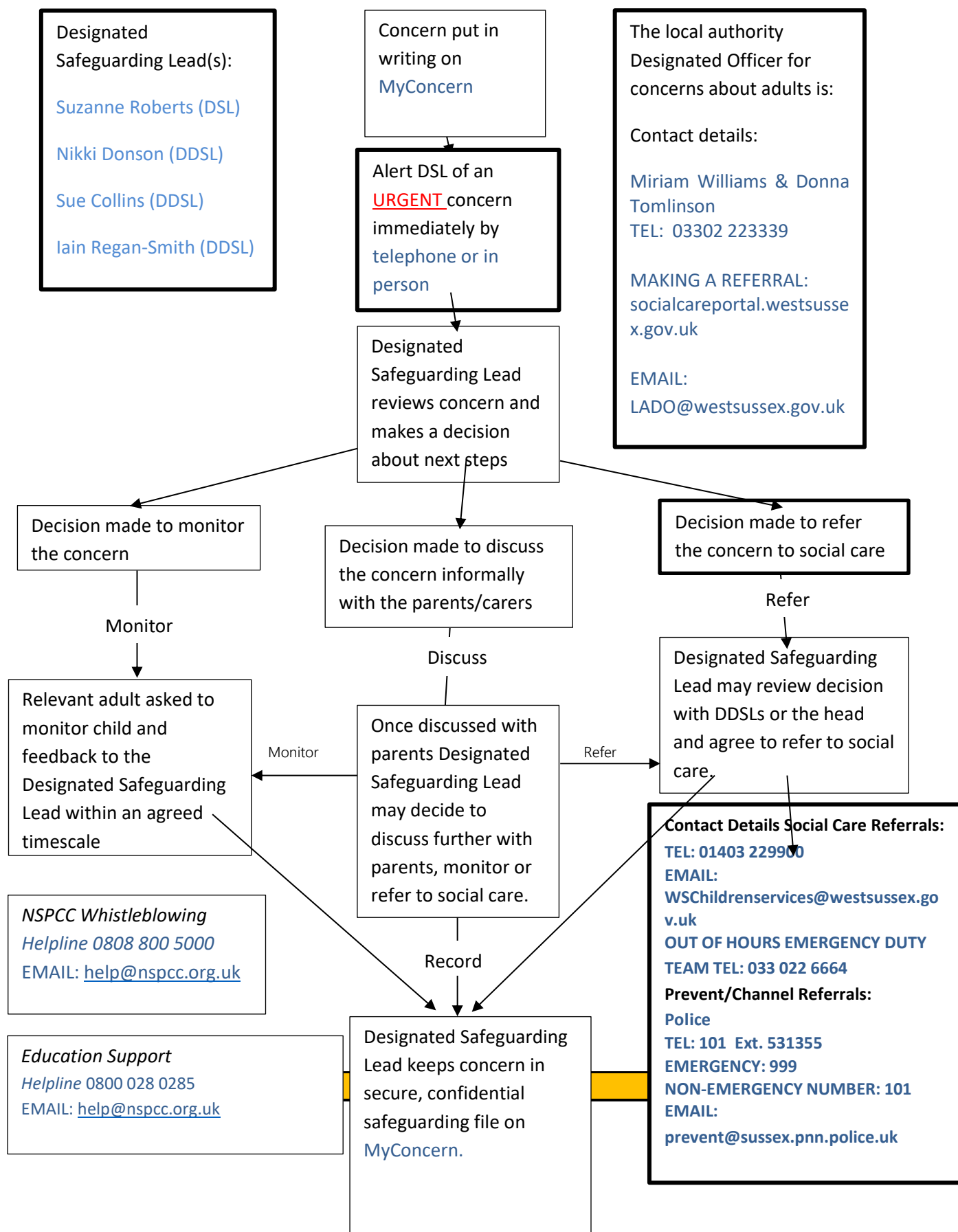
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ANNEX 2





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Safeguarding File Retention

West Sussex County Council children's services
File Retention and Destruction Policy

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4.2 Children

Type of Record	Retention Period	Notes
Children Looked After	75 years from date of birth or 15 years after death before age 18	After discharge from care or cessation of service
Family casework	7 years	After cessation of service
Assessment under Children (Leaving Care) Act 2000	6 years	After provision of service ceases
In Care and Adoption Orders	75 years	From 18 th birthday
Child Protection Register	70 years	From Case Closure
Childminders Records	3 years	After cessation of service
Youth Offending Client Files	30 years from date of birth	
Children subject to Supervision Orders	3 years	After age of 19 is reached
Wardship	75 years	After 18 th birthday
Affiliation Orders (now obsolete)	Until child reaches 25 th birthday	
Guardianship papers (obsolete)	Until child reaches 25 th birthday	
Matrimonial Orders	25 years	After cessation of the order
Maintenance Orders	3 years	After cessation of the order
Safeguarding concerns raised for the welfare of children & young people	75 years from date of birth or 15 years after death before age 18	Applies whether outcome is registration on CPR or not.

Retention Periods Guidance from the Information and Records Management Society (IRMS)

Whilst there is no definitive statutory guidance, most schools and local authorities use the 'Information Management Toolkit for Schools' from the Information and Records Management Society (IRMS). You can find their guidance here: <http://irms.org.uk/page/SchoolsToolkit>

The IRMS Toolkit page 93 says, 'Retention Period: DoB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record'

Government Guidance: Information Sharing

The [Information Sharing \(DfE, 2018\)](#) guidance says, 'In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so'.

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Historical Allegations of Sexual Abuse

Remember that since the beginning of the Independent Inquiry into Child Sexual Abuse (IICSA), organisations should not destroy any records that might be relevant (see <http://www.iicsa.org.uk/media/2871/goddard-inquiry-papers.pdf>). This has been reinforced by including this in Keeping Children Safe in Education.

Retention Periods Judicial Review

In 2015, there was a High Court case into retention periods after a claimant sought a judicial review against Northumberland County Council on the basis that its policy of retaining child protection files for 35 years following case closure was unlawful. The judge concluded that although there was no specific period of time, 35 years 'falls within the bracket of legitimate periods of retention.

You can read more about the case here: [High Court Rules on Retention Period for Child Protection Information](#)

The Data (Use and Access) Act 2025 (DUAA) and the GDPR

In May 2018, the DPA 2018 and GDPR came into force (both updated and most recently in 2025), and, amongst other provisions, it asks organisations to have clear retention policies. The [Data protection: toolkit for schools](#) will help schools do this. The document is clear that data protection should not get in the way of people sharing information.

eRecording Systems (including CPOMS and MyConcern)

The computer systems that are on the market have facilities to transfer data to other schools. At the time of writing, this does not mean that the data is transferred, it simply means that the previous school relinquish access, and access rights are transferred to the new school; the data is kept intact. For more information, please check with the provider of the system.

Do we need parental permission to transfer safeguarding and child protection files?

Safeguarding and Child Protection information is regarded as 'personal information'. This is the 'myth-buster' answer given in the [Data Protection Toolkit for Schools](#) (see Annex 10.1 Safeguarding Myth-Busting)

Is consent always needed to share personal information?

No – you do not necessarily need consent to share personal information. Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit and freely given. There may be some circumstances where it is not appropriate to seek consent because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's or young person's safety at risk.



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What about students who leave at the end of Year 13 (FAQs)
If a Year 13 student is transferring to university, does their Child Protection (CP) file need to be sent to the University? No.
If a Sixth Form student leaves either in Year 12 or at the end of Year 13 to move into employment should the CP file be forwarded to the employer? No. These are education only records.
If a Year 11 student leaves school at 16 to go into employment, is the CP file forwarded to the employer? No.
If a Year 11 student leaves school at 16 to start an apprenticeship is the CP file forwarded on to the college where they may do training one day a week or the employer or neither? Neither.