



St Bernard's Preparatory School

Child Protection and Safeguarding Policy

Authorised by: The Board of Governors of St Bernard's Preparatory School

Date: Advent 2023

Signature:

RM Wockles

Review Date: Advent 2024

Circulation: Governors/all staff/volunteers automatically
Parents on request/School Website

Status: Current

Contents

Mission Statement.....	4
Child Protection Statement	4
Introduction 4	
Key safeguarding contact details for this policy.....	5
Staff Responsibility for Safeguarding.....	6
Types of Abuse and Neglect	8
What to do if a Member of Staff has a Safeguarding Concern about a Child.....	12
Categories of Referral to External Agencies	13
After a Referral Has Been Made	15
Record Keeping	15
Allegations against Staff Members Volunteers or Governors	16
Dealing with allegations that may meet the harms threshold	17
Suspension 19	
Support for those involved	20
Support for those involved	21
Making decisions on allegations	21
Concerns that do not meet the harms threshold	23
Child on Child Abuse	24
Responding to Allegations of Child on Child Abuse	25
Sexual Violence and Sexual Harassment Between Children.....	26
Making/receiving a report	27
Responding to a report	28
Acting on a report	29
Safeguarding Children Away from the School Site	31
Looked After Children and Children with Social Workers	31
Private Fostering.....	31
Children with Special Educational Needs and Disabilities	32
Children with Mental Health Problems	33
Diversity and Inclusion.....	33
Early Years Foundation Stage (EYFS)	33
Child Sexual Exploitation (CSE)	34
Child Criminal Exploitation (CCE), Serious violent crime, County Lines and Modern Slavery	36
County Lines and Modern Slavery	36
Honour Based Abuse	37

St. Bernard's Preparatory School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential.

Forced Marriage	37
Female Genital Mutilation (FGM)	37
Radicalisation /Extremism	38
Child abduction and community safety incidents	39
Whistleblowing	40
Appendix 1: The Role of Designated Safeguarding Leads.....	41
Appendix 2: Safer Recruitment.....	44
Appendix 3: Online Safety and cybercrime	48
Appendix 4: Attendance and the Admissions Register (SIMS) (children missing education) and Elective HomeEducation	50
Appendix 5: Visitors on the School Site and using the school for non-school activities.....	52
Appendix 6: Remote Learning	53
Appendix 7: Key Documents	54
Appendix 8: Related Safeguarding policies and procedures	55
Appendix 9: Raising safeguarding concerns about a child and contact details	56
Appendix 4: Local Contacts.....	56
Appendix 10: Children missing in Education form for Local Authority.....	58
Appendix 11: Trafficked Children and Modern Day Slavery	59
Appendix 12: Referrals to Children’s Social Care.....	60
Appendix 13: Dealing with an Allegation of Child Abuse against an Employee, Volunteer or Any Other Person Working at a School.....	64
Appendix 14: Online Safety Incident Raised by a Child/Young Person or Member of Staff.....	65
Appendix 15: Disqualification from Teaching in EYFS.....	66
Appendix 16: Low Level Concerns Procedure.....	67

Mission Statement

With God as our shelter and Christ as our guide, the mission of St Bernard's Preparatory School is to educate towards love and service to God, each other and the wider community. Through our broad balanced curriculum, we will develop an understanding of each faith and the values we share. We will treat each person with respect, knowing we are special and unique.

St Bernard's is part of the St Benedict's family of schools. All schools in the group share a similar Catholic and Benedictine/Bernardine ethos.

Child Protection Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavor to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We are committed to safeguarding children and promoting the welfare of children and expect all staff and volunteers to share in this commitment.

Introduction

This policy is available on the website and applies to all members of staff including volunteers and Governors. It has regard to *Keeping Children Safe in Education* (2023) (KCSIE), and also *Working together to safeguard children* (2018) (WT), and also *Prevent Duty Guidance: for England and Wales* (July 2015) (Prevent) as well as a number of other documents outlined in appendix 6 of this policy.

Safeguarding is defined by KCSIE as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

A 'Child' is taken to be someone under 18 although of course the school will continue to fully support the welfare of all children when they become 18.

KCSIE 2023 makes the point that when defining 'victim' 'it is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim.' In addition it notes that in using the term 'perpetrator' 'schools and colleges should think very carefully about terminology, especially in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

Key safeguarding contact details for this policy

Key personnel

The Designated Safeguarding Lead (DSL) for child protection is Mrs A Underwood

Contact details: email: aunderwood@stbernardsprep.org tel: 01753 521821

The Deputy Designated Leads are Mrs N Cheesman and Mrs M Biscardi

Contact details: email: ncheesman@stbernardsprep.org mbiscardi@stbernardsprep.org

tel: 01753 521821

The nominated child protection governor is Mr A Johnson

Contact details: email: office@stbernardsprep.org tel: 01753 521821

Early Years Safeguarding Lead is Mrs M Biscardi

Contact details: email: mbiscardi@stbernardsprep.org tel: 01753 521821

Contact details for a referral

Local Slough Support Services

- **Slough Children First** - 01753 875362
- **MARF** - email to sloughchildren.referrals@scstrust.co.uk
- **Family Information Service** <https://www.sloughfamilyservices.org.uk/kb5/sloughcst/directory/home.page>
- **Early Help Hub** - 01753 476589
- **Social Care out of hours service:** 01344 351999 (Daytime Admin Line – 01344 355050)
- **LADO** Dawn Lisles 07927 681858 LADO@sloughchildrenfirst.co.uk
- **Police** 101 (non-emergency) 999 (for emergency) www.thamesvalley.police.uk
- **Prevent/Channel Referrals:** enquiries Prevent@slough.gov.uk
- **National Referral Form and referral pathway** - preventreferrals@thamesvalley.pnn.police.uk 01865 55618
- **Prevent queries** Lubna Hussain lubna.husain@thamesvalley.pnn.police.uk 07973203091 Ranjit Benning ranjit.benning@thamesvalley.pnn.police.uk 07970 145236
- **NSPCC Whistleblowing helpline** 0800 0280285 help@nspcc.org.uk
- **Slough Child Protection Procedures** <http://berks.proceduresonline.com/slough/index.html>
- **Slough Local Safeguarding Board** <https://www.sloughsafeguardingpartnership.org.uk/> Betty Lynch – Business Manager safeguardingboards@slough.gov.uk
- **Education Safeguarding Professional** Jatinder Matharu 07714 858213 jatinder.matharu@slough.gov.uk

National Department for Education (DfE) helpline and mailbox: for non-emergency advice for staff and Governors: 0207 340 7264

Children Missing in Education: 020 8825 59447

OFSTED: Piccadilly Gate, Store Street, Manchester, M1 2WD, 0300 123 1231, enquiries@ofsted.gov.uk

NSPCC: 42 Curtain Road, London, EC2A 2NH, 0808 800 500

Childline: 0800 1111

Staff Responsibility for Safeguarding

The Governors of St Bernard's Prep have strategic leadership responsibility for safeguarding arrangements at the school to facilitate a whole school approach to safeguarding so that it is at the forefront, underpinning all relevant aspects of process and policy development with the child's wishes and feelings always taken into account. All Governors have safeguarding training to equip them with the strategic understanding to work with the Head and Designated Safeguarding Leads (from here on DSL) including an understanding of local arrangements with Slough social services. This means they can assure themselves that there are clear safeguarding systems in place as set out in this policy that are well promoted, easily understood and easily accessible for children to confidently report abuse knowing their concerns will be treated seriously and that they can safely express their views and give feedback. The policy recognises that while all children should be protected some groups of children are potentially at greater risk of harm.

KCSIE 2023 paras 83-93 makes explicit the obligations of Governors under the Human Rights Act (1998), Equality Act (2010) and Public Sector Equality Duty. This reinforces their safeguarding duties, for instance noting that 'governing bodies...should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics – including disability, sex, sexual orientation, gender reassignment and race' with a link to Equality Act 2010: advice for schools. Following this guidance St Bernard's both in its policies and actions does 'take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting children with a particular protected characteristic in order to meet their specific need.' For the Public Sector Equality Duty 'whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these...This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.' See Technical Guidance on the Public Sector Equality Duty.

All staff at the school know that safeguarding and promoting the welfare of children is **everyone's** responsibility. Staff in schools are in a particularly important position as they can identify concerns early on, provide help and prevent concerns from escalating. All members of staff at St Bernard's Prep have a responsibility to provide a safe environment in which children can learn, and in their actions, they must always consider what is in the best interests of each child, working with a child-centered approach. The wishes of the child will be taken into account when determining action to be taken and services to provide. Children are actively encouraged to raise concerns, and are taught about safeguarding by covering relevant issues throughout their time at St Bernard's Prep both in our PSHCE course and, where appropriate, in academic lessons.

An addition in KCSIE 2023 para 19 emphasises that 'staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected' as 'may feel embarrassed, humiliated or being threatened' or 'they may not recognise their experience as harmful.' Most importantly it states 'This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.' Staff training at St Bernard's places great emphasis on developing this 'professional curiosity' and building relationships with children.

Perhaps most importantly, all staff must maintain an attitude of **'it could happen here'** when it comes to potential safeguarding concerns. It is important that all members of staff play a part in identifying concerns, sharing information and taking prompt action so that all children receive the right help at the right time to address risks and prevent issues escalating. Data protection concerns should not be a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. Serious case reviews show the dangers of failing to take effective action with poor practice including, "failing to act on and refer early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; sharing information too slowly; not challenging those who appear not to be taking action". Safeguarding training includes understanding the importance of online safeguarding including understanding the Schools own filtering and monitoring system for computers and staff roles and responsibilities and respect of this (see Appendix 3). All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All school staff should be prepared to identify children who might benefit from pastoral support and with potential safeguarding concerns. Contextual safeguarding is emphasised in KCSIE (2023) with staff, especially DSLs needing to be aware that safeguarding behaviours or incidents can be associated with factors outside school, and that staff should always consider whether children are at risk of abuse or exploitation in these situations, particularly if happening outside their families. Extra-familial harms take a variety of forms, perhaps most obviously Child Sexual Exploitation and Child Criminal Exploitation as explained below in sections 17 and 18.

Any staff member with concerns about a child's welfare should pass on their concerns to a DSL, although they can make a referral themselves. Our staff are important in providing early help to children with safeguarding issues so that as soon as a problem emerges then support will be provided as quickly as possible. Staff training ensures that they are aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989 - especially section 17 (children in need) and section 27 (children suffering harm). They are also trained to be aware of the different types of abuse and neglect so that they can identify cases of children who might be in need of help.

To ensure that all members of staff understand their safeguarding responsibilities Part 1 of Keeping Children Safe in Education (KCSIE) must be read by all staff (The Annex A condensed version is less comprehensive but may be used for members of staff who do not have such good English) and followed by the governing body and all staff (including volunteers) in the school. All staff are given a copy of this during their induction as well as the school's child protection policy (including policy and procedures to deal with peer on peer abuse), staff code of conduct (part of the Staff Handbook), and the school's behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying) and attendance policy (including children missing in education). Safeguarding training (including *Prevent* awareness and online safety) is also part of all staff induction which looks at the school safeguarding policy and the role of the DSL's. There is also annual training in safeguarding (including online safety) in place for all staff so that they can understand and discharge their safeguarding responsibilities as well as more regular updates (training/email/bulletins) through the year. Governors also receive appropriate child protection and safer recruitment training with refresher training every two years. Temporary, voluntary and new staff who work in school are given separate training if they have not attended the annual training at the start of the year. With all training the Governors have regard to Teachers' Standards which set out the expectations that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires all teachers to have a clear understanding of the needs of all children.

The Governors ensure, working with the Headteacher and the Head of PSHCE, that all children are taught PSHCE in every year in a curriculum which teaches them about personal health and safety, safeguarding, online safety and Relationships and Sex Education. There is a separate PSHCE policy on the school's website.

It is recognised that effective education is tailored to specific needs so children with particular vulnerabilities such as SEND or victims of abuse will be considered appropriately in how they are taught to give them a more personalised and contextualised approach, for instance with 1:1 support in some topics and being allowed to work separately when there are topics which might be difficult for them to participate in with the rest of their class. The statutory guidance is here: <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education> and further resources can be found in paragraphs 130-132 of KCSIE 2023.

The PSHCE curriculum is a key part of preventative education that ensures that St Bernard's has a culture of zero tolerance for 'sexism, misogyny/misandry, homophobia, biphobic and sexual violence harassment.' (KCSIE para 130). The behaviour policy and practice also gives a clear set of values.

Types of Abuse and Neglect

Knowing what to look for is vital in the early identification of abuse and neglect. Further information can be found in *What to do if you are worried a child is being abused – Advice for practitioners*. Staff should be particularly alert to potential need for support for a child who:

- Is disabled or has certain health conditions including mental health needs or/and has a Special Educational Need or Disability (SEND) (whether or not they have an Education Health and Care Plan);
- Is a young carer;
- Is a privately fostered child or has returned home to their family from care;
- Is at risk of being radicalized or exploited;
- Is frequently missing from home/not attending school including persistent absences for part of the school day;
- Is showing signs of being drawn into anti-social/criminal/gang behaviour and/or known to be misusing drugs or alcohol or involved in consensual and non-consensual sharing of nudes and semi-nudes images and/or videos;
- Is at risk of honour-based abuse such as FGM or forced marriage;
- Has challenging family circumstances such as a family member in prison or an offender, adult mental health problems or domestic abuse or has returned home to their family from care.

In all cases, if staff members are unsure, they should always speak to one of the DSL's.

All staff should be aware that abuse, neglect and any safeguarding issues are rarely standalone events that can be covered by one definition and in most cases many issues overlap with each other. Safeguarding incidents can be associated with factors outside school and all staff should consider whether children are at risk of abuse or exploitation in situations outside their families such as sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines. In addition, staff should be vigilant for the fact that there could be domestic abuse occurring which can have a particularly serious, long lasting, emotional and psychological impact. Advice on this can be found at *NSPCC- Domestic Abuse*.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing and misogynistic 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.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. It is important to note that abuse can be partly or entirely online as well as physical. Staff training ensures that staff are also aware that children are capable of abusing their peers. Ensuring children are aware of forms of online abuse as part of their PSHCE programme of study.

Possible signs of abuse include (but are not limited to):

- The child says s/he has been abused or asks a question which gives rise to that inference;
- There is no reasonable or consistent explanation for a child's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- The child's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the child's behaviour;
- The child asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- The child's development is delayed or they lose or gain weight;
- The child appears neglected, e.g. dirty, hungry, inadequately clothed;
- The child is reluctant to go home, or has been openly rejected by his / her parents or carers.
- The child is reluctant to go to school.

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

Possible signs of Physical Abuse include:

- Children may seek to conceal such injuries by keeping their arms and legs covered or being reluctant to change for sport;
- Injuries which do not match the explanation given for them;
- Bruises in places where you would not normally expect to find them, in soft tissue, for example, rather than on the bony prominence;
- Bruises which have a distinctive shape or pattern, like hand prints, grasp or finger marks or belt marks;
- Burns or scalds with clear outlines;
- Bite marks and bruises like love-bites;
- Bruising in or around the mouth.

Emotional Abuse: This is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It is more than just occasional criticism. It may involve conveying to children 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 opportunity to express their views by deliberate silencing or making fun of what is said. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Possible signs of Emotional Abuse include:

- The child might become withdrawn, nervous, and unhappy or lacking in confidence. It may result in a child being unable to make friends, perhaps because they behave aggressively or inappropriately towards other children;
- The child is continually depressed and withdrawn.
- Runs away or is frightened to go home or is reluctant to attend school.
- Is persistently blamed for things that go wrong.
- Is made to carry out tasks inappropriate to their age.
- Is not allowed to do normal childhood activities.
- Displays excessive fear of their parents or carers.
- Is excessively clingy and tearful.

Sexual Abuse: The key elements in any definition of sexual abuse are the betrayal of trust and responsibility and the abuse of power for the purpose of the sexual gratification of the abuser. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children with child on child abuse which all staff should be aware of.

The abuser may use different ways to persuade the child to cooperate such as bribery, threats or physical force. Sexual abuse can take different forms, from touching to intercourse, and often does not cause any outward signs of physical injury. It can happen to boys as well as girls and to children of any age, from birth to 18 years old. Sexual abuse can have long lasting effects. Some children who have been abused go on to abuse other children. Some find as they grow up that they are unable to have close relationships with other people. Others deliberately injure themselves.

Possible sign of sexual abuse includes:

- The child exhibits sexually explicit behaviour;
- Has inappropriate sexual knowledge for his or her age;
- Attempts suicide or self-inflicts injuries;
- Repeatedly runs away from home.

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may affect a foetus 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.

Possible signs of neglect include:

- The child is constantly hungry, greedy or stealing food;
- Has lingering illnesses which have not been treated;
- Is continually smelly, scruffy and dirty;
- Is often dressed in inadequate or unsuitable clothing for the weather conditions;
- Suffers repeated accidents, suggesting a lack of proper supervision;
- Is constantly tired;
- Does not respond when given attention or, on the other hand, one who craves attention and affection from any adult.

Domestic Abuse: This is not directly the abuse of children but its significance for young people's wellbeing means that it is emphasized in KCSIE (2023). In addition, the Domestic Abuse Act 2021 recognises the impact of domestic abuse can have on children as victims in their own right if they see, hear, or experience the effects of this abuse. It is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass psychological, physical, sexual, financial and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. The National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/https://safelives.org.uk/sites/default/files/resources/Safe%20Young%20Lives%20web.pdf>

What to do if a Member of Staff has a Safeguarding Concern about a Child

If a member of staff has any safeguarding concern, they should act upon it straight away. 'Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately' (KCSIE 2023). Guidance for this can be found in *What to do if you are worried a child is being abused – Advice for Practitioners* (March 2015.)

St Bernard's Prep refers all matters of concern as a matter of course to:

- Slough Children First 01753 875362 slough.children.referrals@scstrust.co.uk
- Early Help 01753 476589 sloughchildren.referrals@sloughchildrenfirst.co.uk
- LADO 07927 681858 LADO@sloughchildrenfirst.co.uk

When a member of staff suspects or hears a complaint of abuse they must:

- Listen carefully to the child and keep an open mind. Staff must not take a decision as to whether or not abuse has taken place. Staff should understand that they are not making a diagnosis when receiving concerns, just taking them down to be passed on. It could be that signs of abuse noted in Part 3 might not prove that there is abuse and they do not constitute proof in themselves.
- Not ask leading questions, that is a question which suggests its own answer for instance, 'was it your father?' or 'Did this take place on Tuesday when you were away?'
- Reassure the child that they are being taken seriously but that they cannot give a guarantee of confidentiality. The member of staff should explain that (while maintaining an appropriate level of confidentiality) they need to pass the information on to the DSL or, where appropriate, children's social care.
- Keep a written record of the conversation. This should include the date time and place of the conversation, the essence of what was said and done, by whom and in whose presence. It is also useful to describe observable behaviour such as crying, shaking, etc. although this should not be interpreted. Wherever possible, the actual words spoken by the child should be recorded. This should be signed by the person making it and should use names not initials. The record must be kept securely and handed to the DSL. If possible, notes should be taken in the meeting itself, or if not then as soon as possible after it. This must then be recorded on MyConcern.
- Preserve any evidence that they are given for instance scribbled notes, mobile phones with messages on them, clothing or computers. **One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images but to retain the device the pictures are on for external agencies.**

Early information sharing is vital, and staff should not assume that another colleague will take action or share information to help keep that child safe. No single professional can have a full picture of a child's needs and everyone who comes into contact with them has a role to play in identifying concerns. UK GDPR does not prevent the sharing of information for the purposes of keeping children safe, as elaborated in section 7.

All suspicions or complaints of abuse must be reported to one of the DSL's (or the Headteacher if the complaint involves the DSL). If a DSL is not available, this should not delay appropriate action being taken by any member of staff though and **anyone can make a referral**. However, if this happens, the DSL should be informed of actions that have been taken as soon as possible.

The DSL will:

- Look at the child's pastoral/safeguarding record on MyConcern;
- Make a referral if not already made by a member of staff, and if a referral by phone has been made to complete a written referral form.
- Inform the parent/carer unless it is felt that this would put the child at risk. Although parental consent is not needed, it is almost always beneficial to have cooperation. This issue, and what should be said to parents, will be discussed with children's social care.
- Provide as much information as possible in a referral, particularly as the referral should consider whether children are being harmed in contexts outside the home – known as contextual safeguarding.

Categories of Referral to External Agencies

In all cases where referrals are made to Children's Social Care or any other external agency, any member of staff may make a referral but in the majority of cases the referral will be made by a DSL. If a referral is made by another member of staff, they will receive support from the DSL in making the referral and working with external agencies after this. The contact details for making referrals in Slough can be found at the start of the policy (if a child lives in a different authority the referral will be made to that different authority.)

When safeguarding concerns emerge, the member of staff concerned/DSL should refer to the Slough LSCB Threshold Guidance: Levels of need:

Children may have unmet needs at any age or stage of development and their circumstances and needs change.

Level 1 represents children with no identified additional needs. Their needs are met through the services they receive in early years, schools and health services such as the GP and the health visitor and some will be also receiving services from housing and the voluntary sector. The majority of children will have this level of need. Those providing a service at this level will continue their involvement with children with increasing the increasing levels of need described below.

Level 2 represents children with additional needs. Some needs can be met by a single agency or practitioner or straightforward working with one or more partners. Some of these children will have more complex needs that are best served by several partners working together in a co-ordinated way, requiring planning and leadership.

Level 3 represents children who need specialist interventions, including those defined as "children in need" as defined by the Children Act 1989. A child is in need if;

- (a) he is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him of services by a local authority or;
- (b) his health or development is likely to be significantly impaired, or further impaired, without the provision for him of such services; or
- (c) he is disabled. The Children Act 1989 stipulates that a child is disabled if "he is blind, deaf or dumb or suffers from mental disorder of any kind or is substantially and permanently handicapped by illness, injury or congenital deformity or such other disability as may be prescribed".

Level 4: A child in need of protection is described in Section 47 of the Children Act 1989

Where a local authority has reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm, the authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare." This duty also applies to children who are in need of care, are unaccompanied asylum seekers, are in the care of the local authority, or are subject to an emergency protection order, interim care order or full care order. Alternatively, a child who is remanded by a court into local authority accommodation or youth detention accommodation will also be deemed as a looked after child and the local authority has duties towards them.

All partners working with these children will continue to deliver services and work in collaboration with the Children's Trust children services social care who takes the lead in these cases and co-ordinate services.

Level 5: Young people who have committed an offence. This refers to young people who get into trouble with the police or are arrested, are charged with a crime and go to court and/ or are convicted of a crime and given a sentence.

All partners working with these children will continue to deliver services and work in collaboration with the Youth Offending Team.

At all levels, those working with the child and family may identify the need to engage support from a wide range of services such as behavioural support, parenting, emotional wellbeing, young people services inclusions services and/ or more specialist services such as services to support domestic abuse victims, specialist mental health services for young people and/or adults, substance misuse teams or any other service or voluntary organisations. For example, young people in need of support as they are not in employment education or training (NEET) and can benefit from support from young people services.

Different levels of referrals and response can be summarised as follows:

Early Help – 'Early Help means providing support as soon as a problem emerges at any point in the child's time at school.' This is a process by which the needs of a child or young person are assessed and an action plan to meet those needs is agreed and progressed. Any such cases will be kept under regular review and consideration given to a potential referral to children's social care for assessment if the child's situation does not seem to be improving or is getting worse.

Children in need – If a child is in need ('unlikely to achieve or maintain a reasonable level of health or development...without the provision of services' Childrens Act 1989) or suffering or likely to suffer from harm, then

St. Bernard's Preparatory School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential.

a referral will be made to SCS to consider a statutory assessment under section 17 of the Children's Act 1989.

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

Children suffering or likely to suffer from significant harm – A referral to SCS (or the LADO if a member of staff is involved) **must** be initiated where there are concerns about maltreatment including all forms of abuse and neglect, female genital mutilation, any other form of so-called honour based violence or extra-family threats such as radicalisation and sexual exploitation. Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm of this sort. This enables them to decide whether they should take an action to safeguard one of the children.

After a Referral Has Been Made

The local authority should make a decision within one working day of a referral being made about what course of action it is taking and should let the referrer know the outcome determining whether:

- The child requires immediate protection and urgent action is required
- The child is in need and should be assessed under section 17
- There is reasonable cause to suspect the child is suffering, or likely to suffer from significant harm and whether enquiries must be made and the child assessed under section 47.
- Any services are required by the child and family
- Further specialist assessments are required to help the local authority to decide on the best course of action

Staff (generally the DSL) will follow up on a referral should information not be forthcoming within three days at least, but in practice within 24 hours. If social workers decide to carry out a statutory assessment at the school, the DSL or other member of staff with DSL support will do everything they can to support that assessment.

If early help or other support is appropriate, the case will be kept under review and consideration given to a new referral to social care. In particular, if after referral the child's situation does not appear to be improving the DSL or person who made the referral will press for reconsideration to ensure that the child's situation improves.

Whatever the outcome of a referral, the DSL will coordinate appropriate ongoing support for the child in school in conjunction with social services

Record Keeping

All concerns, discussions and decisions made in relation to safeguarding concerns and the reasons for those decisions should be recorded in writing. These records should be put onto MyConcern, the school's safeguarding database, as these records constitute a separate child protection file that is secure and confidential and can only be accessed by the relevant teachers. If in doubt about recording information, staff should always discuss with a DSL as this is 'special category personal data.' These MyConcern records include a clear and comprehensive summary of the concern, details of how the concern was followed up, it also records any action taken, decisions reached and the outcome.

Information about children's welfare may be shared with others outside the school to help keep children safe from harm. We always aim to discuss this with parents or carers before we do so, but this may not always be possible. If this is the case, the law allows us to share this information without asking first. The Data Protection Act it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Please refer to our Data Protection Policy for further information.

Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The DSL will document information-sharing decisions and actions taken. More information on this can be found in chapter one of WT and advice for staff about information sharing with regard to safeguarding will be part of staff training on Safeguarding. All staff separately have training in handling personal information under the Data Protection Act 2018. More details can be found in:

Information sharing: Advice for practitioners (2018).

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

<https://ico.org.uk/for-organisations/education/>

Allegations against Staff Members Volunteers or Governors

This section of the policy follows Part 4 of KCSIE 2023 and guidance from Slough Social Services.

St Bernard's Prep promotes an open and transparent culture in which all concerns about adults are shared responsibly with the right people and recorded so that all concerns about adults working in any capacity in the school are dealt with promptly and appropriately. We also seek to create an environment where staff are confident to self-refer if, for example, they feel that they might have been misinterpreted or on reflection they believe they have fallen below the standards of our code of conduct.

If staff members have concerns about another staff member, volunteer, supply staff or contractor who might pose a risk of harm to a child/children or may have harmed a child/children they should refer these to the Headteacher without delay. This same duty applies to an allegation made against a governor. Where there are concerns about the Headteacher, this should be referred to the Chair of Governors. It should be ensured that any reporting of any allegations against the Headteacher to the Chair of Governors is made without informing the Headteacher. Staff may look to discuss any of these concerns with the DSL and make any referral through them.

All staff at St Bernard's Preparatory School are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. This is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

At St Bernard's Preparatory School, we use Confide as a secure way of recording and case-managing allegations and concerns against staff members or others who are working or volunteering in or with our organisation. The system enables us to easily record concerns in a secure environment, to record all aspects of any investigations, upload relevant documents and produce accurate reports and data. Confide also allows us to restrict access to the system so data remains confidential and is only available to users with the appropriate permissions.

All staff are able to log in to Confide to record any concerns they may have about other staff members or themselves. Concerns are triaged quickly and appropriate action taken. The Headteacher and the DDSL are the only people who have full access to the Confide system. Please see the 'Low Level Concerns Policy' for further information.

If an adult makes an allegation that they were abused as a child they will be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO. Abuse can be reported no matter how long ago it happened.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases will not meet the criteria of a member of staff having harmed or risking harm to a child, or may do so without warranting either police investigation or enquires by local authority social services. The Headteacher or DSL will always discuss the issue with the LADO within 24 hours before taking a decision on this. In cases where external agencies are not required, St Bernard's Prep will act to resolve the case as speedily as possible while also being fair and consistent. It is imperative that the welfare of the child is looked after. The DSL is responsible for ensuring the child is not at risk, and at the same time the person subject to the allegation should also be supported. In rare occasions when allegations are so serious they require immediate intervention from outside school, the DSL should be informed so that they can consult with external agencies.

Dealing with allegations that may meet the harms threshold

Allegations that meet the harms threshold occur if it is alleged that anyone working at St Bernard's Prep has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child 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 (this includes behaviour that may have happened outside school known as *transferable risk*)

The School will not undertake its own investigations of allegations without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. However, the Headteacher can arrange for basic enquiries to establish facts before contacting the LADO while being careful not to jeopardise any possible police investigation such as: Was the individual in the school at the time of the allegations? Did the individual come into contact with the child? Are there any witnesses or CCTV? Where appropriate, the LADO or another officer appointed by the local authority will deal with the management and oversight of an allegation against a member of staff.

In the first instance the DSL, the Headteacher or (where the Headteacher is the subject of an allegation) the Chair of Governors should discuss the allegation immediately with the LADO and a case manager will be designated. This is to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the LADO in order to help determine whether police involvement is necessary.

In an allegations management meeting St Bernard's Prep will share all relevant information with the other agencies which are also expected to do the same. St Bernard's Prep will ask the police and/or social services to obtain consent from individuals involved to share their statements and evidence for use for the school's own disciplinary process.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the case manager and the designated officer(s), and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the designated officer(s) what action should follow both in respect of the individual and those who made the initial allegation.

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s) and/or social services and the police if appropriate. It is extremely important that the case manager provides them with as much information as possible at that time. Where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not inform the accused until those agencies have been consulted and have agreed what information can be disclosed to the accused. If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance in *Working together to safeguard children*. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. ('Reasonable' means 'using no more force than is needed' and can either be passive to block a child's path or active such as leading a child by the arm out of a classroom. Advice on this is available at Use of Reasonable Force in Schools. Reducing the need for restraint and restrictive intervention gives information about how to support children with learning disabilities and mental health issues who are at risk from restrictive intervention). If the case manager has concern about the welfare of other children in the community or the member of staff's family they should be discussed with the DSL and a risk assessment made and potentially a referral to social services.

Where it is clear that an investigation by external agencies is unnecessary, the LADO should discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the LADO should discuss with the case manager how, and by whom, the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff. However, in other circumstances, such as the nature or complexity of the allegation, the allegation will require an independent investigator. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process with a fortnightly or monthly review depending on the complexity of the case. The first review will, if possible, take place four weeks after the initial assessment and dates for subsequent reviews will be set then. The LADO will provide guidance and advice while the investigation is carried out by either school, social services or the police or a combination.

If there is/has been a criminal investigation or prosecution the police have a duty to inform St Bernard's Prep when the investigation/trial is complete or the investigation has been closed without charge or it has been decided not to prosecute. The case manager will then discuss the case with the LADO and consideration of next steps will take into account the result of the investigation and in particular the different standards of proof required by disciplinary and criminal proceeding.

Suspension

Suspension should not be an automatic response when an allegation is reported and the case manager must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. A number of alternatives for suspension can be found in paragraph 381 of KCSIE 2023. It should only be considered in cases where there is cause to suspect a child, or other children are at risk of harm or if the cases are so serious that it could be grounds for dismissal. Advice on this should be taken from the LADO if in doubt. Social services or the police cannot require that a member of staff be suspended although their views should be given weight. Police involvement does not make it mandatory to suspend a member of staff.

If suspension is considered necessary, the case manager will record the rationale and justification for this and explain what alternatives were considered and why rejected. Often an inquiry can be resolved quickly without suspension and a decision will then be made about whether the individual will continue to work at St Bernard's Prep. When a member of staff has been suspended the LADO and case manager should consider how similar investigations could be carried out without a suspension.

Support for those involved

St Bernard's Prep has a duty of care to employees and so staff will be informed of concerns or allegations as soon as possible and have the likely course of action explained to them unless the police or children's social care services object. They should be advised to contact their trade union representative or colleagues for support and should also be given access to counselling. If suspended, the member of staff will receive written confirmation within one working day with an appropriate level of detail about the reasoning. A named representative will keep the member of staff informed of the progress of the case and consider what support is appropriate, and the member of staff should also be kept informed of other work-related issues. Social contact with colleagues should be allowed unless this would be prejudicial to the enquiry. The allegation will be dealt with as quickly as possible in a fair and consistent way that provides effective protection for the child but also supports the member of staff who is the subject of the allegation to help minimise stress.

Parents/carers of the child or children involved should be told of the allegation as soon as possible. However, where a strategy discussion is required or external agencies need to be involved the case manager should not do so until they have been consulted and agreed what information can be disclosed. Parents/carers should be kept informed of the progress of the case and told the outcome where there is not a criminal prosecution. They should be told any disciplinary outcome in confidence, and parents/carers should be made aware of the requirement to maintain confidentiality about any allegations made against teachers while investigations are ongoing. If St Bernard's Prep needs to make parents aware of an allegation it will be made clear to parents and others that there are restrictions on publishing information.

When an allegation is made, the school should maintain confidentiality while it is being investigated. Reporting restrictions under the Education Act 2011 apply until either the accused is charged with an offence or the Secretary of State or the DfE/TRA (Teaching Regulation Agency) publishes information about an investigation or decision on a disciplinary case. The case manager will take advice from the DSL / police/ social services about who needs to know and what information can be shared in the case; how the school manages leaks/gossip; what information can be given to reduce speculation; how to manage the press. Reporting restrictions do not apply if the individual subject to allegations goes public themselves or gives written consent for another to do so.

Where it is decided that a person who has been suspended can return to work school will provide help and support, particularly with regards to their contact with the child who made the allegations

Support for those involved

St Bernard's Prep has a duty of care to employees and so staff will be informed of concerns or allegations as soon as possible and have the likely course of action explained to them unless the police or children's social care services object. They should be advised to contact their trade union representative or colleagues for support and should also be given access to counselling. If suspended, the member of staff will receive written confirmation within one working day with an appropriate level of detail about the reasoning. A named representative will keep the member of staff informed of the progress of the case and consider what support is appropriate, and the member of staff should also be kept informed of other work-related issues. Social contact with colleagues should be allowed unless this would be prejudicial to the enquiry. The allegation will be dealt with as quickly as possible in a fair and consistent way that provides effective protection for the child but also supports the member of staff who is the subject of the allegation to help minimise stress.

Parents/carers of the child or children involved should be told of the allegation as soon as possible. However, where a strategy discussion is required or external agencies need to be involved the case manager should not do so until they have been consulted and agreed what information can be disclosed. Parents/carers should be kept informed of the progress of the case and told the outcome where there is not a criminal prosecution. They should be told any disciplinary outcome in confidence, and parents/carers should be made aware of the requirement to maintain confidentiality about any allegations made against teachers while investigations are ongoing. If St Bernard's Prep needs to make parents aware of an allegation it will be made clear to parents and others that there are restrictions on publishing information.

When an allegation is made, the school should maintain confidentiality while it is being investigated. Reporting restrictions under the Education Act 2011 apply until either the accused is charged with an offence or the Secretary of State or the DfE/TRA (Teaching Regulation Agency) publishes information about an investigation or decision on a disciplinary case. The case manager will take advice from the DSL / police/ social services about who needs to know and what information can be shared in the case; how the school manages leaks/gossip; what information can be given to reduce speculation; how to manage the press. Reporting restrictions do not apply if the individual subject to allegations goes public themselves or gives written consent for another to do so.

Where it is decided that a person who has been suspended can return to work school will provide help and support, particularly with regards to their contact with the child who made the allegations.

Making decisions on allegations

The school will give due weight to the views of the LADO and to this policy when making a decision about suspension. Advice about whether an allegation against a teacher is sufficiently serious to refer to the Teaching Regulation Agency can be found in [Teacher misconduct: the prohibition of teachers \(April 2018\)](#).

The following definitions should be used when determining the outcome of allegation investigations:

Substantiated: there is sufficient evidence to prove the allegation;

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

False: there is sufficient evidence to disprove the allegation;

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

St Bernard's Prep has a legal duty to report to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the harm test is satisfied in respect of that individual;
- Where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence;
- If that individual has been removed from working (paid or unpaid) in regulated activity (even if deployed to another area of work not regulated or if suspended), or would have been removed had they not left.

A compromise/settlement agreement will not be used where there is an allegation that an individual poses a risk to children and there will always be a prompt and detailed report to the DBS and Teaching Regulation Agency. In each case St Bernard's Prep will consider whether to refer the case to the Secretary of State who may investigate the case. Any such incidents will be followed by a review of the safeguarding procedures within the School done together with the LADO, with a report being presented to the Governors without delay.

School will also not stop their investigation if the person leaves or resigns as it is important that allegations are investigated thoroughly in every case. The accused will have full opportunity to answer allegations, but the process of investigating the allegation will continue even if the accused does not cooperate. If they have left before the process is complete they should be notified of the conclusion of the investigation and sanctions that result from it.

It is important that reports to the DBS include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise/settlement agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The Governors have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources. The School will confirm to inspectors all instances of action in relation to safeguarding concerns and if the allegation is substantiated the outcome will be made clear when providing references as long as the information is factual and does not include opinions.

For substantiated allegations the following information should be kept on the file of the person accused so that reference checks can be accurate and provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- A note of any action taken and decisions reached and the outcome.
- A copy of the allegation provided to the person concerned where agreed by social services and the police.
- A declaration on whether the information will be referred to in any future reference.

Records about allegations of sexual abuse must be preserved for IICSA for the terms of the inquiry and all other records retained at least until the accused has reached pensionable age or for 10 years from the date of the allegation if that is longer. Further guidance on employment records can be found [here](#).

If an allegation against a member of staff is found to have been malicious, it will be removed from personnel records. If an allegation is not substantiated, is unfounded or malicious, it will not be referred to in any employment reference. For all other allegations, a clear comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on a person's confidential personnel file, and a copy provided to the person concerned. In such cases the LADO and case manager will consider if the person who has made the allegation needs support and may have been abused at another time. With malicious allegations the school will consider whether disciplinary action is appropriate against the person making the allegation.

Whatever the outcome of a case and how serious it has been the case manager will consider the case and determine whether any lessons can be learned or improvements made in the light of this

Concerns that do not meet the harms threshold

A low-level concern is still significant as an issue that is inconsistent with the staff code of conduct, but is not enough to meet the harms thresholds as set out in section 8.1 and so would not normally be considered serious enough to refer to the LADO. Examples of such behaviour (and this can be behaviour both in and outside school) are: being over friendly, having favourites, taking photographs of children on their mobile phone, engaging with children one-to-one away from other people, using inappropriate sexualised, intimidating or offensive language. More detailed guidance on low-level concerns can be found [here](#). Where there is uncertainty about the level of concern raised then the LADO will be consulted.

St Bernard's Prep has a staff code of conduct which is contained in the Staff Handbook which makes clear the expectations of staff, what constitutes a low-level concern and the importance of openness and transparency when dealing with these issues. It also makes clear that staff should feel empowered to share low-level safeguarding concerns with the Headteacher, that unprofessional behaviour will be addressed (including support to help correct it) and that there will be a proportionate response to concerns when raised. The Governors ensure that this is implemented effectively through regular training in both safeguarding and the code of conduct.

Any such concerns about any member of staff should be reported in the same way as more serious concerns that do meet the harms threshold to either the Headteacher or the chair of Governors. If a concern is raised by a third party the Headteacher will collect evidence on the concern by talking directly to the person who first raised the concern and also to the individual involved and any witnesses. This will help to categorise the type of behaviour and determine next steps, all of which needs to be recorded along with the action taken and rationale for that. These concerns are shared responsibly and dealt with appropriately as with any other concern.

All low-level concerns are recorded with details of the concern, the context of the case and the action taken along with the name of the individual sharing the concern unless they wish to be anonymous. There is review of concerns so that possible areas for improvement in the school's safeguarding system and wider culture can be addressed and so that potential patterns of concerning behaviour can be identified. If a pattern is noted the school will consult with the LADO about next steps. Information on low-level concerns will be retained by the school while it holds a file on that member of staff.

Low-level concerns are not included in references unless they would normally be included, for instance misconduct or poor performance.

Child on Child Abuse

The School recognises that children are capable of abusing their peers, known as child on child abuse. This can either be between two children of any sex or through a group of children abusing a child or another group of children. It can happen both in school and outside school and can also happen online. Any incidents of alleged or suspected abuse by children or young people will be taken seriously and reported to the safeguarding leads immediately.

All staff understand that, in whatever form it takes, it is never acceptable, will never be tolerated, and is not an inevitable part of growing up or as 'banter', 'just having a laugh' or 'boys being boys'. All staff are trained in our procedures with regards to child on child abuse and that they have an important role to play in preventing or responding to it. Downplaying these behaviours can lead to a culture of poor behaviour and an unsafe environment in the school and in worst cases normalises abuse leading to children accepting it as normal and not coming forward to report it.

Staff know that child on child abuse might take various forms so that they can identify and respond to it; for example, (and the following list is not exhaustive):

- Bullying, including cyberbullying and prejudice-based and discriminatory bullying such as racial, homophobic, gender or culture-related bullying or abuse.
- Physical abuse such as hitting, kicking, biting (this may include an online element condoning or threatening physical abuse);
- Sexual harassment and sexual violence, including abuse in intimate personal relationships between peers (this may include an online element condoning or threatening physical abuse)
- Causing someone to engage in sexual activity without consent e.g. forcing them to strip, touch themselves sexually or engage in sexual activity with a third party;
- Via the use of ICT e.g. consensual and non-consensual sharing of nudes and semi-nude images and/or videos, or 'revenge pornography' - staff should be particularly mindful of the potential for the misuse of information technology for bullying and abusive purposes;
- Grooming by peers as part of child sexual exploitation;
- Abuse linked to gang-related activity or initiation-type violence/rituals.
- Upskirting which typically involves taking a picture under a person's clothing without them knowing, 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. This is a criminal act under the Voyeurism Act of April 2019. The Act specifically states that the culprit cannot claim that images were just taken 'for a laugh', and anyone of any sex can be a victim.
- Initiation/hazing type violence/ritual, which could include harassment, abuse or humiliation as an initiation process and may include an online element.

We know that child on child abuse might manifest differently for boys and girls, e.g. girls being touched inappropriately or coerced into sexual activity, boys being initiated into gangs etc. Such abuse may also be indicative of a previous or ongoing abusive experience for a perpetrator and / or victim.

Research indicates that children with SEND, additional or complex needs are particularly vulnerable. All staff should be mindful of the added vulnerability of children and young people who have been the victims of violent crime, including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator is likely to have considerable unmet needs, as well as posing a significant risk of harm to other children. Evidence suggests such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may, therefore, be suffering, or at risk of suffering, significant harm and be in need of protection. Consequently, any plan to reduce and / or manage risk posed by a child, who is alleged to have abused another, must also address their needs and responses should be considered accordingly.

As a school, we recognise that it is not enough 'just' to respond to incidents should they arise. We understand, that even if there are no reports in our school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse they should speak to their DSL (or deputy). In addition, we try and **minimise the possibility of child on child abuse** by:

- Creating and maintaining an environment which is safe, caring, respectful and stimulating, and which seeks to promote the social, physical and moral development of our children.
- Actively discouraging and challenging all unacceptable behaviour, including all forms of bullying and abuse. We will also challenge the attitudes and behaviours which underpin it;
- Strike an appropriate balance between the child's right to privacy and the need for proportionate supervision to keep them safe in and around school;
- Have in place clear strategies for promoting positive behaviour, including a system of rewards and sanctions that is clear to staff, children and parents;
- Maximise opportunities within the curriculum, via PSHCE, assemblies and focused weeks to deliver key keeping safe and associated behavioural, spiritual, moral, social and cultural messages - including the use of external resources and the expertise of external speakers and groups;
- Ensuring all adults associated with our school understand their role and responsibilities as role models;
- Ensuring staff and any volunteers are trained to look for and respond appropriately to any potential indicators of child on child abuse.
- Seeking appropriate and timely advice where uncertainty exists and / or concerns arise.
- Ensuring children and parents know how to raise any worries or concerns with adults / staff in school and by signposting them to appropriate sources of advice and support outside school.

Responding to Allegations of Child on Child Abuse

The school recognises the need for sensitivity and proportionality when dealing with these difficult issues. The following general rules will apply to their management:

- The safeguarding leads will seek appropriate and timely advice wherever necessary and contact Slough Safeguarding where there are concerns, or the equivalent if the child lives in a different Local Authority. The safety and best interests of victim(s) will be the paramount consideration at all times. The safeguarding leads will also consider the possibility and take account of any wider and / or ongoing risk(s) to others;
- The needs of the victim and the needs of the alleged perpetrator will be considered separately;
- In addition to safeguarding the identified victim, the school will consider (i) whether the alleged perpetrator seems to pose a risk to any other children; and (ii) how best to manage that risk;
- Children and young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes;
- The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children;
- Where necessary, the school will participate fully in a co-ordinated approach by child welfare/ protection, youth offending, education and health agencies.

Sexual Violence and Sexual Harassment Between Children

This section of the policy follows Part 5 of KCSIE 2023 and also Annex B which has many links to online support and advice. It is also informed by Ofsted's Review of sexual abuse in schools and colleges (June 2021).

Harmful sexual behaviour (HSB) is a useful umbrella term for the different forms of inappropriate, problematic, abusive and violent sexual behaviour. In considering HSB sexual behaviour where there is a big age difference (more than two years) can be considered harmful although it also depends on e.g. physical size, or if for instance the older child has a disability. Understanding HSB is an important part of safeguarding training at St Bernard's and also the PSHCE programme.

Sexual harassment is 'unwanted conduct of a sexual nature' and can include sexual comments such as sexualized names, comments or stories, sexualized jokes, physical behaviour such as brushing against someone or interfering with their clothes, displaying pictures of a sexual nature, online sexual harassment such as consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. It can violate a child's dignity, make them feel intimidated or degraded and create a hostile, offensive or sexualised environment.

Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003 including, rape and sexual assault. Specific definitions of types of sexual violence can be found in Part 5 of KCSIE 2023. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online or offline (or both) and violates a child's dignity and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment. Sexual harassment and violence exist in a continuum and may overlap.

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

- A child under the age of 13 can NEVER consent to any sexual activity;
- The age of consent in the UK is 16;
- Sexual intercourse without consent is rape.

St Bernard's Prep has a zero-tolerance approach to sexual violence and/or sexual harassment and will always respond appropriately to all reports, including incidents taking place outside school or online. Even if an incident does not seem that serious in the first instance addressing any poor behaviour will help to prevent further, and potentially worse, behaviour in the future. All staff understand that, in whatever form it takes sexual violence and/or sexual harassment is never acceptable, will never be tolerated, and is not an inevitable part of growing up or as 'banter', 'just having a laugh' or 'boys being boys'. St Bernard's Prep challenges inappropriate behaviours, in particular potentially criminal behaviour such as grabbing bottoms or breasts and genitalia, flicking bras, lifting up skirts and such actions are sanctioned severely under our discipline policy. Downplaying these behaviours can lead to a culture of poor behaviour and an unsafe environment in the school and in worst cases normalises abuse leading to children accepting it as normal and not coming forward to report it.

As with safeguarding, staff must always take the line that 'it could happen here' Also, as in other areas of Safeguarding, it is important to be aware that SEND children can be especially vulnerable. This issue is addressed as a whole school issue as part of our wider safeguarding policy. It forms part of our staff training and is dealt with in through the PSHCE curriculum.

Children who are victims of sexual violence and/or harassment will find this stressful and distressing, particularly if the alleged perpetrator(s) attend the same school. Even more than with other forms of child on child abuse we understand, that even if there are no reports in school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child on child abuse they should speak to their DSL (or deputy).

All victims are taken seriously, supported to be kept safe, and are offered support both pastorally and also bearing in mind the potential impact on their educational attainment. Staff will look to emphasise to the victim and reassure them that they are being taken seriously, they are being supported and will be kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or harassment and they should certainly not be made to feel ashamed by making a report. It will also be explained that the law is there to protect children and not criminalise to help avoiding alarm or distress.

Making/receiving a report

Children are encouraged to report abuse or any other safeguarding concerns to a member of staff that they trust, and this is regularly reinforced in PSHCE lessons and form time.

It is often not easy for children to tell staff about abuse directly. Often concerns will arise from changing behaviour or appearance and staff might also hear about abuse indirectly from another child or possibly from overhearing conversations about possible concerns. Staff should always look to act if they have any concerns that come to them indirectly like this. In particular they should bear in mind that some children may face additional barriers to reporting because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

We will aim where possible to have two members of staff present in the case of a child making a disclosure. As ever with safeguarding they will not promise confidentiality although the report will also only be shared with the necessary people. As with other safeguarding disclosures staff should look to listen carefully, reflect the child's language in what they say, be non-judgmental and not ask leading questions although **staff can ask children if they have been harmed and what the nature of that harm was**. An objective written record should be made either during the meeting or straight after (the preferred option, so that the child can be given full attention). Next steps will be explained to the victim including who the report will be passed to.

It is extremely important that all staff respond properly to a report from a child because this response will either encourage or undermine the confidence of that child or other children to potentially come forward to report sexual violence and/or harassment in future. A disclosure of sexual violence or harassment will be treated like any other safeguarding disclosure, including abuse that occurs online or outside school.

Staff should bear in mind that this might be only the first reported incident rather than just a single incident. Trauma can affect memory, so children might not be able to recall some details.

One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images but to retain the device the pictures are on for external agencies.

St. Bernard's Preparatory School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential.

Responding to a report

The school will offer support such as counselling to the victim. If an allegation does go through the criminal justice system, there will be anonymity offered in the legal system, and St Bernard's Prep will do all it can to reasonably protect the anonymity of any children involved in a report of sexual violence or harassment. As ever with safeguarding, only appropriate and relevant staff will be informed about the report.

When there has been a report of sexual violence the DSL will make an immediate risk and needs assessment (and in cases of harassment if it is felt necessary) considering the victim's needs, whether there have been other victims, the alleged perpetrator and other children in their peer group (and possibly staff). Risk assessments will be recorded and kept under review considering the risks and putting measures in place to protect all concerned and keep them safe.

Reports of sexual violence and sexual harassment are often particularly complex and difficult and so the DSL will always look to talk through any cases such as this with Slough social services unless it is clearly of a very low level for instance a one-off incidence of name calling. In cases where a crime has been committed the DSL will also contact the police, and more widely will contribute to any multi-agency requirements as necessary.

The DSL will normally be the person to decide on the School's response to a report of sexual violence or harassment. In all cases, the initial report will be carefully evaluated on a case-by-case basis. The School's approach will consider:

- The wishes of the victim on how to proceed where possible. Victims should be given as much control as reasonably possible over how the investigation will proceed and what support is offered to them although this will be balanced with our responsibilities to protect other children;
- The nature of the alleged incident;
- The ages and developmental stages of the children involved. In particular, if there are any power imbalances for instance if an older child is the perpetrator;
- If this is a one-off incident or part of a pattern (including the possibility of other forms of abuse);
- That sexual violence and harassment can take place within intimate personal relationships between peers.
- Any on-going risks to the children involved including the wider protection of all the children in St Bernard's Prep.
- Wider environmental factors where incidents or behaviour is associated with issues outside school and environmental factors are present that are a threat to the one or more of the children's health or welfare. This contextual understanding can be very important if a safeguarding referral is made.

Acting on a report

Given the distress caused by potential close proximity of a victim and an alleged perpetrator at school, the alleged perpetrator in a very serious case such as rape or assault will be removed immediately from any classes they share with the victim. Risk assessments should be updated as appropriate. Separation is done to support both children and is not a judgement on the guilt of the alleged perpetrator. More widely outside the classroom, the DSL will look to see how the children involved can be kept a reasonable distance apart outside while the facts of the case are established either by school or social services or the police. In other cases of sexual violence and/or harassment again the DSL will make a judgement on whether, and how much, separation is needed.

The DSL should carefully consider when to inform the alleged perpetrator(s) of the report. Where social services and/or the police are informed this would only happen after discussion with these other agencies.

The victim may ask St Bernard's not to tell anyone about an incident but as with other safeguarding incidents if a child has been harmed, is at risk of harm or is in immediate danger a referral must be made, and if a crime has been perpetrated this must be referred to the police. Parents/carers will normally be informed unless this would put the victim at risk. The DSL will balance the victim's wishes against the duty to protect them and other children and will generally look to take advice with external agencies.

Consideration will be given to supporting other children who have witnessed or been affected by an incident. This includes working to ensure children are not taking 'sides' and bullying or harassing any of those involved either physically or online. This includes consideration of how children get to and from school.

There are four likely scenarios to consider when managing reports of sexual violence and/or sexual harassment

- 1) **Manage Internally.** This might be the case with, for instance, a one-off low-level incident. It should still be made clear though that there is zero tolerance of this sort of behaviour and all the discussions and decisions made around the case should be recorded as usual.
- 2) **Early help.** While it might be that no referral is needed in a case like this it might be decided that support is needed to address concerns and to prevent an escalation of unacceptable behaviour either from within school or with the services offered through Slough. It could be that both are used as the school can manage the situation internally and also seek external 'Early Help.' Again, all the details of the case will be recorded and zero tolerance will be stressed.
- 3) **Referral to social care.** Where a child has been harmed, is at risk of harm or is in immediate danger a referral will be made to Slough. This referral will be made with the same principles as any safeguarding referral, with particular significance given to the need to make sure that the victim, and any other affected children including the alleged perpetrator are protected immediately without waiting for an investigation to start. Social services may feel that intervention is not appropriate, but a new referral should be made if it is felt that the child remains in danger or at risk of harm. Again, all the details of the case will be recorded and zero tolerance will be stressed.
- 4) **Report to the police.** Police reports will always follow from reports of rape, assault by penetration or sexual assault. Next steps will be made in consultation with the police including whether the police will take further action and when to inform parents, and the DSL will make sure that actions taken by St Bernard's Prep do not jeopardise the police investigation.

In the case of a criminal investigation St Bernard's will work closely with the police and other agencies to ensure the school's actions do not jeopardise the police investigation while it is ongoing. KCSIE 2023 para 543 specifies that 'Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing' but this will always be considered on a case-by-case basis. If a criminal investigation leads to a conviction or caution, St Bernard's will then take disciplinary action according to the school discipline policy. In most situations like this, the incident would be a serious breach of discipline and lead to the view that allowing the perpetrator to remain at St Bernard's would seriously harm the education and welfare of the victim. Whether the perpetrator remains in school or not a risk assessment will be made for all the children involved in consultation with the children, families and external agencies with particular emphasis on avoiding bullying and harassment from other children who may well know about the case.

If there is no further action on the case school will provide support and also follow its own disciplinary procedures as the burden of proof for a criminal case and a school disciplinary proceeding is very different. If a report is found to have been unfounded or false or malicious the DSL will consider what further steps need to be taken both in supporting the children and also potentially as a disciplinary concern. The DSL will record decisions made on MyConcern both to record the events and explain decision making.

Decisions regarding safeguarding support for the victim should be based on the following principles:

- As above, the needs and wishes of the victim should be paramount within the context of protecting the child. Wherever possible the victim should be able to continue with their normal routine so that St Bernard's Prep remains a safe place for them. A victim will never be made to feel they are the problem for making the report;
- Also, as above, consider the age and developmental stage of the victim, especially as there will often be a power/age imbalance between the victim and alleged perpetrator;
- Support should be on a case-by-case basis so that there is a proportionality to the school response as well as effective support for the victim. It is possible that this support could be very long-term depending on the nature of the incident and St Bernard's Prep will in particular seek to ensure that the victim is not isolated from their peer group or bullied or harassed;
- Needs can be on a range including mental, physical and sexual health or unwanted pregnancy and external support can be found with the NHS Sexual Assault Referral Centre (SARC). Details of this and further support can be found in paragraph 465 of KCSIE 2023.

Decisions regarding safeguarding support for the perpetrator should be based on the following principles:

- While needing to safeguard the victim and wider child body, the alleged perpetrator will also need support and they should be provided with education, ongoing safeguarding support and information about any disciplinary sanctions. Support and disciplinary proceedings are not mutually exclusive and may need to happen at the same time;
- Consideration of the developmental stage and age of the alleged perpetrator and the proportionality of the response to be decided on a case-by-case basis.

All decisions and actions are regularly reviewed and 'lessons learnt' are discussed. If patterns of behaviour across the school are identified then the pastoral team will look to take appropriate action to remedy this. Consideration will always be given as to whether extra teaching time and/or staff training should be put in place to make sure that the wider culture of the school is such that possibilities of inappropriate behaviour like this are minimised.

Safeguarding Children Away from the School Site

When on school trips, it is important that staff continue to apply all elements of the safeguarding policy and continue to be vigilant for potential safeguarding issues. The DSLs can be contacted by phone or email if there are any urgent safeguarding issues that need discussion.

Looked After Children and Children with Social Workers

A child who is looked after by a local authority (referred to as a looked-after-child) as defined in section 22 of the Children Act (1989), means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by a local authority. Should the school have on roll a child who is looked after by the Local Authority, St Bernard's Prep will ensure that our staff have the skills, knowledge and understanding necessary to keep them safe. In particular the DSL will ensure that all agencies work together and prompt action is taken on concerns to safeguard these particularly vulnerable children.

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

A child who has been looked after in the past remains vulnerable and so St Bernard's Prep will continue to have extra pastoral support in place for them.

If there is a child at St Bernard's Prep who has been in care, the DSL will get the details of the local authority Personal Advisor who has been appointed to support them and will liaise with them if there are any concerns.

A child may need a social worker due to safeguarding or welfare needs such as abuse, neglect or complex family circumstances. Local authorities should share the fact that a child has a social worker and the DSL will record this on MyConcern, so that all the relevant teachers are aware. Where children need a social worker, this will inform decisions about safeguarding (for instance responding to unauthorised absence or similar indications of possible risk) and about promoting welfare (like the provision of pastoral and/or academic support). For more information see [Review of children in Need \(2018\)](#).

Private Fostering

If a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility or relative in their own home this is Private Fostering. It is not considered private fostering if it happens for fewer than 28 days. Where the school becomes aware of a private fostering arrangement this should be raised with the DSL. The school must then notify the local authority so that they can check that this arrangement is suitable and safe for the child. Once notified, a social worker from the local authority will arrange to visit the child's parents, the private foster carers and the child themselves. They will keep in touch with these people at regular intervals to ensure that everything is going well and will offer support to foster carers and parents.

Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers arise when recognising abuse and neglect in this group of children. It can sometimes be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration. In addition, these children can also be disproportionately impacted by things like abuse, neglect or bullying without outwardly showing any warning signs, often due to communication barriers, isolation, dependency on others etc. SEND children also face additional risks online from potential bullying, grooming or radicalisation and should be supported to stay safe online. A number of serious case reviews have also highlighted the dangers inherent in focusing on adult rather than a child's needs and on a primary focus on support as 'opposed' to potential risk [of abuse]. St Bernard's Prep ensures that children on our SEND register receive additional pastoral support, to help support them in addition to the usual pastoral support given in school.

These children can also suffer abuse in ways other than via overt physical or sexual assaults, which means that staff need to be mindful of a wide-range of issues when working with these young people. For example, privacy, dignity and respect, food, mobility / restraint, intimate care, finances, medication, the use of aids and adaptations.

In order to safeguard children with more complex needs, staff in school will work especially hard to develop the skills they need to give them a 'voice'. In practice, three essential questions always need to be asked:

What is expected of this child? - Developmentally, behaviourally etc.

Do I / we understand how any condition, disability, impairment or other factor e.g. culture impacts?

How well can I / we understand and communicate with this child?

National guidance makes it clear that for some children it is not yet possible to prescribe techniques for communicating about possible abusive experiences in ways which are reliable and evidentially safe. Spontaneous disclosures are rare from disabled children, especially those who use alternative or augmentative communication systems and abuse is more likely to be identified via physical signs, behavioural responses and /or emotional presentation / changes. It is therefore imperative staff are sensitive to what might be very subtle indicators, especially where children have multiple disabilities, and that regular consultation occurs between the SENDCo and DSL in school, especially in circumstances where issues and / or concerns arise.

When applying disciplinary measures to SEND children, the risks will be considered so that it does not add to the vulnerability of the child, for instance if isolating the child from class or having to restrain them in examples of dangerous behaviour physically. The SENDCo works with the pastoral team and all the staff to ensure that there is a clear set of guidelines of how best to work with each of the children on the SEND register, in particular by planning positive and proactive behaviour to avoid problems in advance.

Children with Mental Health Problems

All staff should be aware that mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. While only trained professionals should attempt to diagnose mental health problems, staff are well placed to observe and identify children whose behaviour suggests they may be experiencing a mental health problem or at risk of developing one.

If a child has suffered abuse, neglect or other potentially traumatic experiences, this can have a lasting impact and staff need to be aware of how these experiences can affect mental health, behaviour and education. If staff have a mental health concern, particularly if it is associated with a safeguarding concern, they should record this on MyConcern and/or speak to the DSL.

In the first instance if mental health issues are identified, St Bernard's Prep will look to provide support. If it is felt that it would be helpful and that the threshold would be met, we will make a referral to CAMHS, and/or suggest that the child goes to their GP to ask for them to make a referral to CAMHS.

St Bernard's Prep helps to prevent mental health problems by promoting resilience across the curriculum, and in particular through the PSHCE program as part of an integrated whole school approach to social and emotional wellbeing.

There are a range of useful resources:

Mental Health and Behaviour in Schools (2018)

Preventing and tackling bullying, mental health and behaviour in schools

Working together to build health and happy schools

Public Health England on Mental Health

Promoting and Supporting Mental Health and wellbeing in schools and colleges

Diversity and Inclusion

It is understood that a child who is lesbian, gay, bi or trans (LGBT), or perceived to be LGBT by other children, may be targeted by other children. Because of this risk St Bernard's includes age appropriate lessons on understanding LGBT in its PSHCE curriculum. While not specified in KCSIE 2023 St Bernard's also works actively to educate against all discrimination, and promote inclusion in the other key areas including race, gender and neurodiversity. These topics are also covered in the PSHCE curriculum, and there is ongoing staff training in Diversity and Inclusion to encourage understanding of these issues and encouraging dialogue.

Early Years Foundation Stage (EYFS)

As with all staff, EYFS staff and volunteers are given safeguarding training. They will have training specific to their setting, including identifying signs of possible abuse and neglect for EYFS children at the earliest opportunity. These may include:

- Significant changes in children's behaviour;
- Deterioration in children's general well-being;
- Unexplained bruising, marks or signs of possible abuse or neglect;
- Children's comments which give cause for concern;
- Any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or:
- Inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example: inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

St. Bernard's Preparatory School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential.

The School's policy on the use of mobile phones and cameras in the EYFS setting is set out as per the EYFS Statutory Framework and can also be found in the ICT Acceptable Use Policy for Employees, in the Staff Code of Conduct and includes the following:

- Any personal digital recording device including personal mobile phones, cameras and video recorders cannot be used when in the presence of children either on school premises or when on outings;
- All mobile phones must be stored securely within the setting during contact time with children.
- No parent is permitted to use their mobile phone or use its camera facility whilst inside the EYFS setting. School policy regarding this matter should be explained clearly to Parents by the Head of EYFS;
- Mobile phones must not be used in any teaching area within the setting or within the bathroom area;
- In the case of a personal emergency staff should use the school telephone. It is the responsibility of all staff to make families aware of the school telephone numbers;
- Personal calls may be made in non-contact time but not within the teaching areas;
- Personal mobiles, cameras or video recorders should not be used to record classroom activities. ONLY school equipment should be used;
- Photographs and recordings can only be transferred to and stored on a school computer before printing;
- All telephone contact with Parents/Carers must be made on the school telephone and should be recorded;
- During group outings, nominated staff will have access to the school mobile which can be used in an emergency or for contact purposes;
- In the case of school productions, Parents/carers are permitted to take photographs of their own child in accordance with school protocols which strongly advise against the publication of any such photographs on Social networking sites.

The school will notify the relevant child protection agency of any serious accident or injury to, or the death of, any child while in their care, and will act on any advice from this agency.

Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status by either an individual or group. It takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity either in exchange for something the child wants/needs or for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, the power imbalance may also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status and access to economic or other resources.

It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given though, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Children can be groomed by peers and/or exploited as part of gang-related activity. It does not always involve physical contact and can happen online. It can include both contact (either penetrative and non-penetrative acts) and non-contact sexual activity. It can even occur without the child's knowledge through copying videos or images they have posted online.

CSE can affect any child or young person (male or female) under 18 years old including 16 and 17-year olds who can legally consent to have sex. It can be perpetrated by individuals or groups, males or females, adults or children (who themselves might be experiencing exploitation so might also be seen as a victim). The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation under acronym SAFEGUARD:

- Sexual Health and Behaviour: Sexually transmitted infections; pregnancy; terminations; inappropriate sexualised behaviour.
- Absence from school or repeatedly running away or going missing.
- Familial Abuse and/or problems at home: Forced marriage or honour-based violence; domestic abuse; substance misuse; parental mental ill-health; homelessness; privately fostered/looked after.
- Emotional and Physical Condition: Suicidal Ideation; self-harm; low self-esteem; confusion re sexual orientation; SEND; poor mental health; unexplained injuries or changes in appearance
- Gangs, older age groups, involved in Criminality: Direct involvement with gang members; involvement in criminal activity; involvement with older individuals including having older boyfriends or girlfriends or lack of same-age friends; contact with victims of CSE.
- Use of technology, sexual bullying, and evidence of consensual and non-consensual sharing of nudes and semi-nudes images and/or videos or other sexualised communication online; multiple phones; problematic use of internet/social networking.
- Alcohol or Drug Misuse.
- Receipt of unexplained gifts or money including mobile phone credit, clothes, jewellery money.
- Distrust of Authority Figures either in or out of school.

Further information can be found on the NSPCC website and GOV.UK: [What to do if you suspect a child is being sexually exploited](#). Any concerns relating to CSE will be reported to the DSL who will follow safeguarding referral procedures.

Child sexual exploitation is widely unreported because it relies on the vulnerabilities of children in a way that makes them feel unable to share their experience with others. If staff find evidence that a child is being sexually exploited it is important they refer this to either the police, or Slough, or the equivalent if the child lives in a different Local Authority, depending on the urgency of the situation either themselves or through the DSL.

There are a number of things that we can do to prevent CSE and / or help other agencies to disrupt the activities of those engaging or intent on engaging in it. Via the curriculum and through engagement with parents and carers, we will raise awareness around healthy relationships and, where appropriate, CSE and grooming processes, including how this can happen online;

Information sharing is vital in identifying and tackling all forms of abuse and *especially* child sexual exploitation. We will be vigilant, seek advice, monitor attendance, keep robust registers, share information and contribute effectively to multi-agency processes designed to prevent, disrupt and / or prosecute perpetrators of CSE. We are also mindful of our contribution to processes designed to protect children who have been victims of CSE:

Physically - Making it as hard as possible for perpetrators to gain access to young people; face-to-face but also via phones, online etc.

Relationally - By ensuring that young people experience safe, stable relationships which counteract the abuse and, for Looked After Children, provide stability in terms of education and placements;

Psychologically - Helping young people to find a source of [positive] identity outside of abusive

St. Bernard's Preparatory School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential.

relationships. Also providing extra support to help maintain their educational attainment.

Child Criminal Exploitation (CCE), Serious violent crime, County Lines and Modern Slavery

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants and/ or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact and 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, or to threaten other young people.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. All the factors involved in creating vulnerability to CSE (section 17) can also be found in CCE. Signs of involvement in any of these activities may include increased absence from school whether by exclusion or not, having experienced child maltreatment, 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 and involvement in offending. 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. If any of these warning signs are noticed by a member of staff, they should enter them onto MyConcern and talk to one of the DSLs. As always in child protection and care, early intervention is the most effective way of helping potentially vulnerable children.

St Bernard's Prep always ensures to pass on any safeguarding information to other institutions when children leave us, and to get information from other institutions concerning children who join us.

We work closely with the local council services and the police with regards to dealing with anti-social behaviour or crime in the area.

County Lines and Modern Slavery

Often related to serious violent crime, and a growing national risk for vulnerable children across the country is 'county lines' activity. 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone line or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Children can be targeted and recruited in school as well as other places. They are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection. Children can become trapped into this exploitation by gangs creating drug debts and can threaten serious violence or kidnapping towards victims or their families if they attempt to leave the county lines network.

Potential involvement in county lines can be identified by episodes of missing home and/or school when the victim may have been trafficked and a referral to the National Referral Mechanism should be considered in these cases. Other possible indicators are being the victim or perpetrator of violent crime, being involved in drugs, are found in accommodation where they have no connection (called a 'trap house' or 'cuckooing' owe a 'debt bond' to their exploiters or have a bank account to facilitate drug dealing.

Involvement in these forms of crime is extremely risky for any child, not just because of the potential for a criminal record but also because of the even more serious risk of physical and/or sexual abuse of children by gangs with which they might become involved. The advice for schools on these issues can be found in 'Preventing youth violence and gang involvement' <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence> and 'Criminal exploitation of children and vulnerable adults: county lines' guidance: <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

Potentially linked with this is the issue of modern slavery. This 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 [Modern Slavery Statutory Guidance](#).

Honour Based Abuse

So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found in KCSIE and [Multi-agency guidelines: Handling case of forced marriage](#).

Forced Marriage

Forced marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other forms of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional or psychological. This is different from an arranged marriage where the couple still have the right to accept the arrangement.

If staff have a concern regarding a child that might be at risk of HBA, they should follow procedures for other safeguarding concerns.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is prohibited by law in England, Scotland and Wales, whether it is committed against a United Kingdom national or permanent United Kingdom resident in the UK or abroad. FGM is an abuse of the human rights of girls and women and therefore a child protection issue.

Teachers **must** personally report to the police (by ringing 101) cases where they discover that an act of FGM appears to have been carried out. They should also still consider and discuss any such case with the DSL and involve children's social care as appropriate. The duty to contact the police does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over although cases like this will be discussed by contacting Slough. Further guidance can be found in Multi agency statutory guidance on FGM.

Radicalisation /Extremism

Children are vulnerable to extremist ideology and radicalisation and as with other forms of harm or abuse protecting children from this risk is part of our safeguarding duty. Any potential concern regarding Radicalisation or Extremism should be noted on MyConcern to alert the DSL and SLT. A decision will then be made about who will contact the Prevent Team.

St Bernard's Prep uses the Governmental accepted definition of extremism as:

'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

And radicalisation as:

'The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.'

And terrorism as:

'An action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.'

There is no place for extremist views of any kind in our school, whether from internal sources – children, staff or Governors, or external sources - school community, external agencies or individuals. Our children see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

Extremism and exposure to extremist materials and influences can lead to poor outcomes for children. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. As part of wider safeguarding responsibilities, school staff will be alert to:

- Disclosures by children of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where children have not actively sought these out;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Children accessing extremist material online, including through social networking sites;
- Parental reports of changes in behaviour, friendship or actions and requests for assistance;
- Partner schools, local authority services, and police reports of issues affecting children in other schools or settings;
- Children voicing opinions drawn from extremist ideologies and narratives. Also use of extremist or 'hate' terms to exclude others or incite violence;

- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;
- 'INCEL' (Involuntary Celibate) material online that is extremely misogynistic and promotes violence against women.
- Attempts to impose extremist views or practices on others;
- Anti-Western or Anti-British views.

In line with the Counter-Terrorism and Security Act (2015), the Headteacher and Governors, delegated to the DSL, assess the risk of children in the school being drawn into terrorism, including how likely they are to be exposed to extremist ideas that are part of a terrorist ideology.

When the school hosts visiting speakers, there are clear, set protocols for ensuring that the material is suitable and that the speakers are appropriately supervised (see Appendix 5). Our School will work in partnership with other agencies: co-operate productively, in particular, with local *Prevent* co-ordinators, the police and closely follow any procedure as set out by Slough Safeguarding Children Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

The School's ICT policies contain robust procedures and practice to ensure children are safe from extremist material when accessing the internet in school, including by ensuring suitable filtering is in place. All staff have had *Prevent* training to:

- Have the knowledge and confidence to identify children who are at risk;
- Be able to challenge extremist ideas used to legitimise terrorism;
- Know where and how to refer children and young people for further help (including the local police or by dialing 101);
- Ensure that our children remain safe online with a priority on robust ICT protocols and procedures as well as having appropriate levels of filtering on the Internet;

St Bernard's Prep will normally discuss any concerns in relation to possible radicalisation with a child's parents as they are in a key position to spot signs of radicalisation. This will not happen if there is a specific reason to believe that to do so would put the child at risk. Families who raise concerns themselves will be supported.

Channel is a voluntary and confidential support programme aiming to provide early stage support for those identified as vulnerably to radicalization/terrorism. *Prevent* referrals might be passed to Channel, and St Bernard's Prep will support engagement with this. If a child in Channel is going to a new school the DSL will share their participation in Channel with the new school so that they continue supporting their participation.

Child abduction and community safety incidents

Child abduction, the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child, can be committed by anyone and is just one example highlighted by KCSIE 2023 of safeguarding concerns that can arise for children outside school.

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. St Bernard's Prep educates its children in the PSHCE programme about how to keep themselves safe and adapts these lessons to the different age and independence of children, for example, as they start walking to school on their own. Lessons look to build children's confidence, abilities and resilience rather than simply warning them about all strangers.

Another possible issue from outside school that could occur for children is homelessness. It is not likely to occur for a family whose children attend a fee-paying school but homelessness might also occur with children living independently from their parents/guardians, for instance if they are excluded from the family home. Guidance in instances such as this can be found in Appendix B of KCSIE 2023.

Whistleblowing

All staff should feel able to raise concerns about poor practice or potential failures in the school's safeguarding, and are required to report to the Headteacher any concern or allegations about school practices or the behaviour of colleagues. This is in accordance with the Whistleblowing Policy.

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

Appendix 1: The Role of Designated Safeguarding Leads

St Bernard's Prep has a number of DSL's to support staff in carrying out their safeguarding duties and liaising with external services. They are members of the leadership team with the necessary status and authority to be responsible for matters relating to child protection and welfare throughout all areas of the school which is a very significant level of responsibility. St Bernard's Prep ensures that the safeguarding leads have sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively and they regularly attend safeguarding seminars as well as taking the statutory training required every two years. Their responsibilities are included in their job description. During term time a safeguarding lead will always be available (during school hours) for staff and children in the school to discuss any safeguarding concerns. A DSL is always contactable during the school holidays via the school office.

The areas of responsibility of the DSL's are:

Acting on Safeguarding issues

- To advise and act upon all suspicion, belief and evidence of abuse reported to them;
- To be the first point of contact for parents, children, staff and external agencies in all matters of child protection and safeguarding.
- To ensure that appropriate action is taken in the School and that procedures are followed in all actual or suspected cases of child abuse. To contact the LADO within twenty-four hours to seek advice on safeguarding concerns brought by staff or children. Also, to also check whether or not the child or child's family involved is known to social services and to continue to liaise with external agencies that are involved in supporting the welfare of a child and where appropriate work with Family Information Service (FIS);
- To be aware of the differentiation between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies and the Slough Thresholds of Need Guide;
- To make referrals under the Prevent duty and through them to the Channel programme where appropriate;
- To keep the Headteacher informed of all actions (unless the Headteacher is the subject of a complaint - In this situation, the DSL should consult with the Chair of Governors or in their absence, the Governor with responsibility for Safeguarding;)
- To understand the risks associated with online safety and also the additional risks faced by SEND children and children with mental health problems online, for example from online bullying, grooming or radicalisation. Also, to have the up to date capability to keep children safe online at school, in particular understanding the filtering and monitoring systems and processes in place at St Bernard's.
- To liaise with other agencies such as the police (for advice see When to Call the Police: advice for School and Colleges) and liaise with the LADO on behalf of the school, co-ordinate child protection procedures and to have a working knowledge of the Local Authority's safeguarding procedures and the school's Child Protection and Safeguarding Policy and procedures;
- The DSLs understand who to contact in the event of an incident of sexual violence or harassment as per KCSIE 2023 as these concerns go to ECIRS and/or the police if appropriate.
- To deal with issues arising from, or relating to, historical allegations;

Longer term support and training

- Training in safeguarding to be updated every 2 years (with refresher training at least annually through, for instance, meeting other DSL's or taking the time to read about safeguarding developments) and also Prevent awareness training focusing on how to identify, understand and respond to specific needs that can increase vulnerability.
- To ensure all staff have training in child protection and access to the school's child protection policy so that they fully understand part one of KCSIE 2023 as well as regular reviews of their own practice and opportunities to discuss any concerns they may have about safeguarding matters. This includes making sure staff are aware of the importance of information sharing, as well as training opportunities outside the school and local safeguarding policies. It is good practice for other members of staff to contribute to this training where appropriate. This will include training in how to refer cases of suspected abuse to the local authority children's social care as required (or the police if a crime has been committed) and also in the Prevent duty. All staff, volunteers and Governors will be trained in the Prevent duty and how to refer cases to the Channel programme where there is a radicalisation concern as required;
- To encourage a culture of listening to children and taking their wishes into account among the staff in any measures the school might put in place. Also understanding the difficulties that children may have approaching staff with problems and taking time to consider how to build trusted relationships which facilitate communication.
- To promote supportive engagement with parents and carers in safeguarding to promote the welfare of children, and to make them aware of the fact that referrals about suspected abuse or neglect might be made, especially where families may be facing difficult circumstances. Also, to ensure the child protection policy is always available on the school website.
- To liaise with the SENDCO where safeguarding concerns are linked to mental health.
- Where appropriate, to take part in the child protection conferences or reviews. If the DSL cannot attend they will ensure that another of those responsible for Child Welfare and Safeguarding will attend. More broadly to keep a strong link with our local safeguarding agency and other external agencies, understanding the importance of providing information and to safeguard and promote the welfare of children at St Bernard's Prep.
- Together with the Headteacher and School Leadership Team, annually to review the School's Policy on Child Protection and Safeguarding and more frequently if amendments are made and in each term look at how the duties have been discharged, and to report on this to the Governing Body. A report will be given termly to the Governors and the reports will be viewed by the all Governors annually as part of the Safeguarding training for Governors. Any deficiencies or weaknesses in regard to child protection arrangements will be remedied without delay;
- In addition, having lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues children are facing and identifying the long-term impact this might have on attendance, engagement and achievement. In particular, understanding the academic progress and maintaining high aspirations for children who have or have had a social worker. Also supporting the teaching staff in knowing who these children are, and in providing additional academic support and/or reasonable adjustments to help them reach their potential even after they no longer have a social worker.

- Where children leave the school, the DSL will ensure their child protection file is transferred to the new school as soon as reasonably possible. This is transferred separately from the main child file, ensuring secure transit and confirmation of receipt is obtained. Beyond purely safeguarding concerns the DSL will share pastoral information needed to help the new school put in place the right support for the child to be safeguarded and supported to thrive in their new school;
- To refer cases to the DBS as required where a person is dismissed or has left due to risk/harm to a child;
- To monitor the keeping, confidentiality and storage of detailed, accurate and secure written records in relation to child protection. Also, to promote the use of MyConcern as the central online database for safeguarding records and train staff in its use in line with the Data Protection Act 2018. This ensures that child welfare and safeguarding issues are managed centrally while allowing only the relevant staff to contribute efficiently and effectively. Records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolve and a note of action taken, decisions reached and the outcome.

Appendix 2: Safer Recruitment

St Bernard's Prep has a culture of safe recruitment, and makes its decisions about the suitability of employees based on the checks and evidence as set out in part three of KCSIE 2023, which provides a clear chronology of requirements and best practice with regard to staff recruitment, and also ISI Regulatory Requirements.

Recruitment and selection

The Governors create a strong safeguarding culture at St Bernard's Prep with a robust recruitment procedure to deter and prevent unsuitable people from applying to, or being employed by, St Bernard's Prep. All recruitment panels will include at least one person who has received safer recruitment training.

Adverts for positions at St Bernard's Prep include the safeguarding requirements of the role as well as the school's commitment to safeguarding, and whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. As suggested in para 220 of KCSIE 2023 an online search on shortlisted candidates might be carried out as part of due diligence.

Application forms for roles in **regulated activity** (that is staff regularly teaching or caring for children when unsupervised or with other opportunities for regular contact with children such as personal care or healthcare or any overnight activity see Factual note on regulated activity in relation to children and further explanation in Annex E of KCSIE 2023) include a statement that it is an offense to apply for the role if the applicant is barred from engaging in regulated activity relevant to children. Application forms also refer to a link to the child protection policy on the school website. A CV should not be accepted in place of an application form, and applicants must provide:

- Personal details, current and former names, current address and national insurance number.
- Employment details including reasons for leaving and a full employment history since leaving school including reasons for any gaps in employment. Verification should be obtained of an individual's most recent relevant period of employment where the applicant is not currently employed.
- Details of referees. Open references should not be accepted. The applicants should not obtain the reference. References should be from the candidate's current employer and be from a senior person – in the case of a school referee the Headteacher should confirm the reference is accurate in respect to disciplinary investigations. A reference should come from the relevant employer from the last time the applicant worked with children if not currently working with children or from their current employer if they have never worked with children. Electronic references should always be checked to ensure they originate from a legitimate source.
- A statement of how they meet the person specification
- A declaration confirming that the information they have provided is true

At least two people carry out shortlisting and they should explore all potential concerns, for instance inconsistencies or gaps in employment. Information should be compared between the application form and references. Referees should be contacted to clarify where information is vague or insufficient. Shortlisted candidates will be asked to complete a self-declaration of criminal record or other information that would make them unsuitable to work with children. Online searches also may be done on candidates shortlisted, and the candidates will be informed of this.

Interviews should ask the candidate's motivation for working with children, ask about their experience and skills of working with children and probe any gaps in employment. Areas that might be of concern from a candidate would be indicators of negative safeguarding behaviours, any implication that adults and children are equal, a lack of recognition of the vulnerability of children, inappropriate idealisation of children and inadequate understanding of appropriate boundaries between adults and children. Children should be involved in the recruitment process in a

meaningful way. Any information about past disciplinary action or allegations should be considered and all information considered in decision making should be clearly recorded along with decisions made.

Pre-appointment checks

Governors must ensure the following checks apply to all individuals appointed to engage in regulated activity with children and appointments must be conditional on completion of these checks. The same checks also apply to volunteers (including Governors) working for the school as well as those in paid employment. These checks are:

- References, identity checks and interview information, including the candidate's mental and physical ability to carry out their responsibilities which should be checked at interview.
- The person's right to work in the UK. If the person has lived or worked outside the UK St Bernard's Prep makes checks to ensure that any relevant events that occurred outside the UK can be considered (for details of this see paragraphs 279-282 of KCSIE 2023)
- Professional qualifications. The Teacher Regulation Agency's (TRA) Employer Access Service should be used to verify Qualified Teacher Status.
- Enhanced DBS check. More details on types of DBS checks including for contractors and the DBS update service can be found in paragraphs 236-247 of KCSIE 2023
- Barred list check for staff involved in a regulated activity. A separate children's barred list check should be obtained if an individual will start in regulated activity before the DBS is available.
- Prohibition from teaching check issued by the Secretary of State or any sanctions or restrictions imposed by the GTCE (for further details see paragraphs 252-254 of KCSIE 2023). For staff who work in childcare provision a check that they are not disqualified under the Childcare (Disqualification) Regulations 2009.
- A self-declaration of 'Disqualification by Association' (see 11b below - for staff who work in early years' provision and those who work in later years' provision for children who have not attained the age of 8 and employees who are directly concerned in the management of such provision)
- A section 128 check (checking names of individuals barred from management of an independent school) for school Governors and staff in a management position (for further details see paragraphs 255-259 of KCSIE 2023).

Records of these checks will be kept on the single central record for all staff, who work at the school including volunteers, Governors and supply/agency staff if applicable of pre-appointment checks as set out in paragraphs 229-231 of KCSIE 2023. The date on which each check was completed will be kept for the identity check, barred list check, enhanced DBS check, prohibition from teaching check, further checks on people who have lived or worked outside the UK, check of professional qualifications, check to establish the person's right to work in the UK.

Every recruitment panel includes at least one member of staff who has undergone safer recruitment training under the scheme currently operated by The Department for Education with refresher training as required by Slough Safeguarding Children Board.

When using staff from an agency or third party organisation, St Bernard's Prep obtains written notification that they have carried out their own safeguarding checks including written notification that an enhanced DBS certificate and barred list check has been obtained. Where such an enhanced DBS certificate has disclosed any information St Bernard's Prep must get a copy of the certificate from the agency. St Bernard's Prep then checks that the person coming for work is the same person on whom the checks have been made.

Where using contractors St Bernard's Prep will set out safeguarding requirements in the contract between the organisation and St Bernard's Prep to ensure any contractor working in the school has been subject to an appropriate level of DBS check. No contractor for whom no checks have been obtained will be allowed to work unsupervised in the school. In the case of self-employed staff working for St Bernard's Prep the school will obtain a DBS check for them.

Trainee teachers paid directly by St Bernard's Prep are checked as with any other employee. Where trainee teachers are fee-funded, the checks are carried out by the teacher training provider as with agency workers.

If a member of staff has not obtained their DBS certificate before they start work, they will be supervised appropriately, and all other checks including a separate barred list check will have been carried out.

In KCSIE 2023, there is specific guidance that if anyone working in school, including supply teachers or volunteers, has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children' this should be taken into account for their suitability for employment. This might include incidents outside school not involving a child, for instance, domestic violence at home. It should be considered what triggered these actions and whether these actions could be triggered in a school context and be a potential risk.

Recording Information

St Bernard's Prep follows regulations in maintaining a single central register (SCR) of pre-appointment checks. This covers all staff even if they work only for one day and members of the governing body. This register contains:

- An identity check.
- A barred list check.
- An enhanced DBS check request/certificate provided.
- A prohibition from teaching check.
- Checks on people who have lived or worked outside the UK.
- A check on professional qualifications.
- A check on the person's right to work in the UK.
- If the person's position involves 'relevant activity' i.e. regular sole charge of persons aged under 18.
- Section 128 check if relevant.
- Whether written confirmation for agency and third-party supply staff has been received that the business supplying these staff has carried out the relevant checks and has the appropriate certificates, the date this confirmation was received and whether details of an enhanced DBS certificate have been provided.

The details of an individual are removed from the SCR once they no longer work at this school. Copies of DBS certificates and records of criminal information disclosed and documents used to verify identity, right to work and required qualifications are kept in each member of staff's personnel file.

Existing staff

In some circumstances St Bernard's Prep needs to carry out new checks on existing staff if an individual moves from a post that was not a regulated activity to one that is, where there has been a break in service of 12 weeks or more, or if there are concerns about an individual's suitability to work with children.

Appendix 2b: Disqualification from Teaching in EYFS

St Bernard's Prep follows the legal guidelines that it is an offence for the School to employ anyone in connection with our early years or later year's provisions with children up to the age of eight who is disqualified from doing so. This applies to normal School activities and any before or after School clubs or activities. It is also a criminal offence for a disqualified person to provide early or later year's provision or to be directly concerned in its management.

The criteria for which a person will be disqualified from working in connection with early or later year's provision are not only that a person is barred from working with children (by inclusion on the Children's Barred List) but also include:

- Having been cautioned for, or convicted of, certain violent and sexual criminal offences against children and adults;
- Any offence involving death or injury to a child.
- Various grounds relating to the care of children, including where an order is made in respect of a child under the person's care;
- Having had registration refused or cancelled in relation to childcare or children's homes;
- Having been disqualified from private fostering;

Living in the same household as another person who is disqualified from registration for early or later year's provision, or living in a household where a disqualified person is employed (disqualification by association). A person does not, however, commit an offence if they do not know, or have no reasonable grounds for believing, that they live in the same household as a disqualified person, or in a household where a disqualified person is employed. A household is defined by the DfE as anyone sharing "living space", including the use of a shared kitchen. The responsibility on individuals is to provide the School with information about people in their household "to the best of their knowledge". This means that a person, who lives in a shared house, renting with others, will not be expected to request this information from those with whom they are not overly familiar.

After making this declaration, staff will be under an on-going duty to inform the School if their circumstances change in a way which would mean they subsequently meet any of the criteria for disqualification. Any failure to disclose relevant information now, or a future change in circumstances, will be treated as a serious disciplinary matter and may lead to dismissal for gross misconduct.

Appendix 3: Online Safety and cybercrime

Children and young people can be exploited and suffer bullying through their use of modern technology such as mobile phones and social networking sites. Technology can also provide the platform to facilitate harm such as child sexual exploitation, radicalisation, sexual predation or child on child abuse and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, advice for which can be found in government advice [here](#). The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material;
- **Contact:** being subjected to harmful online interaction with other users;
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm;
- **Commerce:** risks such as online gambling, inappropriate advertising, financial scams etc.

In order to minimise the risks to our children and young people, we have in place a firewall that prevents searching for inappropriate material online. In addition, St Bernard's can monitor what is being entered by children and the safeguarding leads are alerted automatically if inappropriate or concerning content is entered for them to follow up with the children directly. The school is always careful that "overblocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding and the blocking of specific sites is always under review.

The DSL, SLT and Computing Lead manage the filtering and monitoring systems. The firewall limits internet traffic based on categories and black lists. We track children's activities on any device that the software is installed on. We make an annual review of the provision that the School has in place by reviewing the incidents over the previous year and also talking to our providers. As of 2023 this annual review is also taken to Governors for their oversight in the Pentecost Term.

All monitoring or filtering concerns which arise on school computers or computers brought into school and connected to the School wifi are automatically logged on MyConcern. MyConcern is reviewed termly as part of the Governors meeting, providing another opportunity for Governor oversight of monitoring and filtering concerns. The School ensures that it meets DfE standards for online security: [Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

We have a whole school approach to online safety so we can do our best to keep children safe online both in school and at home. We ensure staff are aware of how not to compromise their position of trust in or outside the setting and are aware of the dangers associated with social networking sites. Online training for staff is considered as part of the overarching safeguarding approach and is updated annually. Given the rapid evolution of technologies there is an annual review of our approach to online safeguarding with an updated risk assessment.

Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of our broad and balanced curriculum. There is particular focus on this in our PSHE curriculum. The school also organises parents' meetings and information brochures to raise parents' awareness of online safety. We expect all children to adhere to the safe use of the internet as detailed in our Online Safety and Anti-Bullying Policies.

Information and support

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

<https://www.thinkuknow.co.uk/>

<http://www.saferinternet.org.uk/>

<https://www.internetmatters.org/>

<https://www.pshe-association.org.uk/>

<http://educateagainsthate.com/>

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet and is another possible safeguarding issue as children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. It is 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). They 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;
- 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.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme, a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line 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](#)

Appendix 4: Attendance and the Admissions Register (SIMS) (children missing education) and Elective Home Education

For school policy regarding attendance and children missing school, please refer to the school attendance policy and government guidance [Working together to improve school attendance](#).

St Bernard's follows this guidance which states that: Good attendance is a learned behaviour, and the most effective schools recognise the importance of developing good patterns of attendance from the outset. Schools that have good attendance recognise that it is not a discrete piece of work but rather it is an integral part of the school's ethos and culture. In building a culture of good school attendance.'

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Effective information sharing between the school and parents is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education either during term time or at a point of transfer to another school is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, sexual or criminal exploitation or radicalisation. It can also indicate mental health problems; substance abuse or other issues. Attendance is therefore discussed as a standing item in SLT meetings, and is part of the DSL's responsibility including evaluation of attendance and plans for improvement where needed. Similarly, a child being absent for prolonged periods or repeatedly can act as a warning sign for safeguarding issues so we follow up any such issues thoroughly. In case of serious attendance concerns St Bernard's will refer this concern to Slough Social Services and the attendance team linked with them.

As found in the school's attendance policy, there is a rigorous procedure to check and deal with unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. The school has an admission register and an attendance register that is monitored daily and if attendance continues to be irregular without good cause then school will inform the local authority (for more details see the school's Attendance policy) There is also regular scrutiny of attendance data so that we identify and provide immediate additional support to children or cohorts that need it, and look at historic and emerging patterns across the school and develop strategies to address them.

New children are put on the admission register at the beginning of the first day on which the school has agreed that the child will attend the school. If a child fails to attend on the agreed or notified date, the school will notify the relevant local authority at the earliest opportunity to prevent the child from going missing from education. The school will regularly request parents to inform them of any changes whenever they occur. This can assist the school in dealing with child welfare issues and any safeguarding issues if they arise. The admission register will include:

- The full name of the child;
- The full name and address of any parent with whom the child lives;
- At least two emergency contact numbers;
- The full name and address of the parent with whom the child is going to live, and the date the child is expected to start living there, if applicable;
- The name of child's destination school and the child's expected start date there, if applicable; and the grounds under which the child's name is to be deleted from the admission register.

When a parent notifies the school of a change of address, the school will record the full name of the parent with whom the child will live, the new address and the date when they move that new address. If a parent notifies school that their son/daughter will be attending another school, then the admissions register (SIMS) will note the name of the new school and that date on which they are due to start attending the school.

The school must inform the local authority where the child is resident, within 5 days, if a child's name is going to be deleted from the admission register on certain grounds (and provide the authority with the information from the admissions register (SIMS) as above along with the ground) on which the child's name is to be deleted:

- When the child has been taken out of school to be home educated,
- When the family has apparently moved away,
- When the child has been certified as medically unfit to attend,
- When the child is in custody for more than four months,
- When the child has been permanently excluded.

Elective Home Education

Schools must inform their LA of all deletions from their admission register when a child is taken off role. Where a parent/carer has expressed their intention a child from St Bernard's Prep with a view to educating at home we will work together with other key professionals and the parents/carers to meet and discuss the final decision to ensure that this is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable and/or has a social worker.

Appendix 5: Visitors on the School Site and using the school for non-school activities

Visitors on the School Site

Any visitor to the school site will have their identity checked at school reception and they will be required to wear an identity badge and to be supervised while on-site. This applies to visiting parents, contractors, visiting speakers and any other visitors.

St Bernard's Prep has visiting speakers frequently, and as part of our responsibility under Prevent we ensure all talks are aligned to the ethos and values of the school and British values. We do this by ensuring that the SLT has background information about the speaker as well as a clear understanding of the purpose of the talk. The school will make prior contact with the speaker to organise this and supervise the speaker while they are on site. In the unlikely event of a speech not aligning with the values and ethos of the school and British values, immediate action will be taken by a member of staff to balance the information given. Each visiting speaker will be evaluated by the organiser and should they not meet the needs of our children then this will be clearly communicated to the visiting speaker/ institution by the Headteacher or DSL.

Staff contractors working regularly in school will be asked to provide their DBS, or checks will be conducted by the school. Any contractors without a DBS will be supervised at all times when working during term time.

It is good practice for staff contractors working regularly in school with opportunity for contact with pupils to have basic safeguarding training at a level appropriate to their role and, for instance, to know the identity of the DSL and the duty to pass on concerns

Using the School for non-school activities

Where any of the facilities of school are rented out by the Governors to organisations or individuals they should ensure that appropriate arrangements are in place to keep children safe as set out Keeping children safe in out-of-school settings. When services or activities are provided by the governing body under the direct supervision or management of St Bernard's our arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. St Bernard's will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the School or college on these matters where appropriate. Safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. If St Bernard's receives an allegation about a safeguarding incident that happened when an individual or organisation was using our premises we will follow our own safeguarding policies and procedures, including informing the LADO.

Appendix 6: Remote Learning

KCSIE 2023 continues to apply during any times of remote learning for some or all children. The best interests and safety of our children always comes first. If anyone has a safeguarding concern, they should act immediately to pass on this concern as they would do normally using MyConcern and/or direct contact with one of the DSL's.

The deputy DSLs, can be contacted through the school office. If they are not available, their concern will be directed to the appropriate member of staff. The DSL continues to be responsible for safeguarding on the school site.

With regards to children's remote learning, St Bernard's Prep will monitor participation in lessons and follow up with parents and children where children are falling behind. Parents are asked in any case to contact the info@stbernardsprep.org email address as usual if their children are ill or unable to attend lessons for any other reasons.

If a member of staff or volunteer working remotely has a concern about another staff member or volunteer posing a safeguarding risk, they should contact the Headteacher 01753 521821.

Child on child abuse does not disappear during a period of remote learning, as it can just as easily happen online as in person. Additional information on keeping safe with online learning can be found in the protocols for online learning.

All staff are trained annually in safeguarding, and in particular staff are aware of the need to look out for mental health issues for children's remote learning.

Exactly the same recruitment criteria will apply at St Bernard's Prep if recruitment is done remotely.

Protocols for online video sharing and online classrooms

1. Both children and staff should be in a common space in their house wherever possible. (It is accepted that at this moment with houses often full, children might need to join classes from their own rooms).
2. Children and staff may dress informally but not casually – essentially the same as would be expected for an own clothes day in school.
3. Behaviour and conversation between children and between children and staff should be exactly as we would expect in school. If a child misbehaves or becomes upset for any reason in an online session, their parents will be informed. In particular children must not record any of the classes being held online without the permission of a teacher, and misuse of any recorded video or images of teachers or other children will be taken very seriously and could potentially be a safeguarding issue. If a child repeatedly misuses the school's technology appropriate action will be taken.
4. Microsoft Teams should not be used as a purely social medium between the children. It is for education purposes and if any discussions between children stray from academic relevance they will be shut down as there are many other social media platforms they can use to chat informally. As ever, any poor behaviour and language in child interactions will be dealt with in line with the school's Behaviour and ICT policies.
5. If anyone does have a concern about inappropriate use of the school's online resources or behaviour in online class or video, then they should report this immediately.
5. One to one pastoral conversations will be done by phone following best safeguarding practice.

Appendix 7: Key Documents

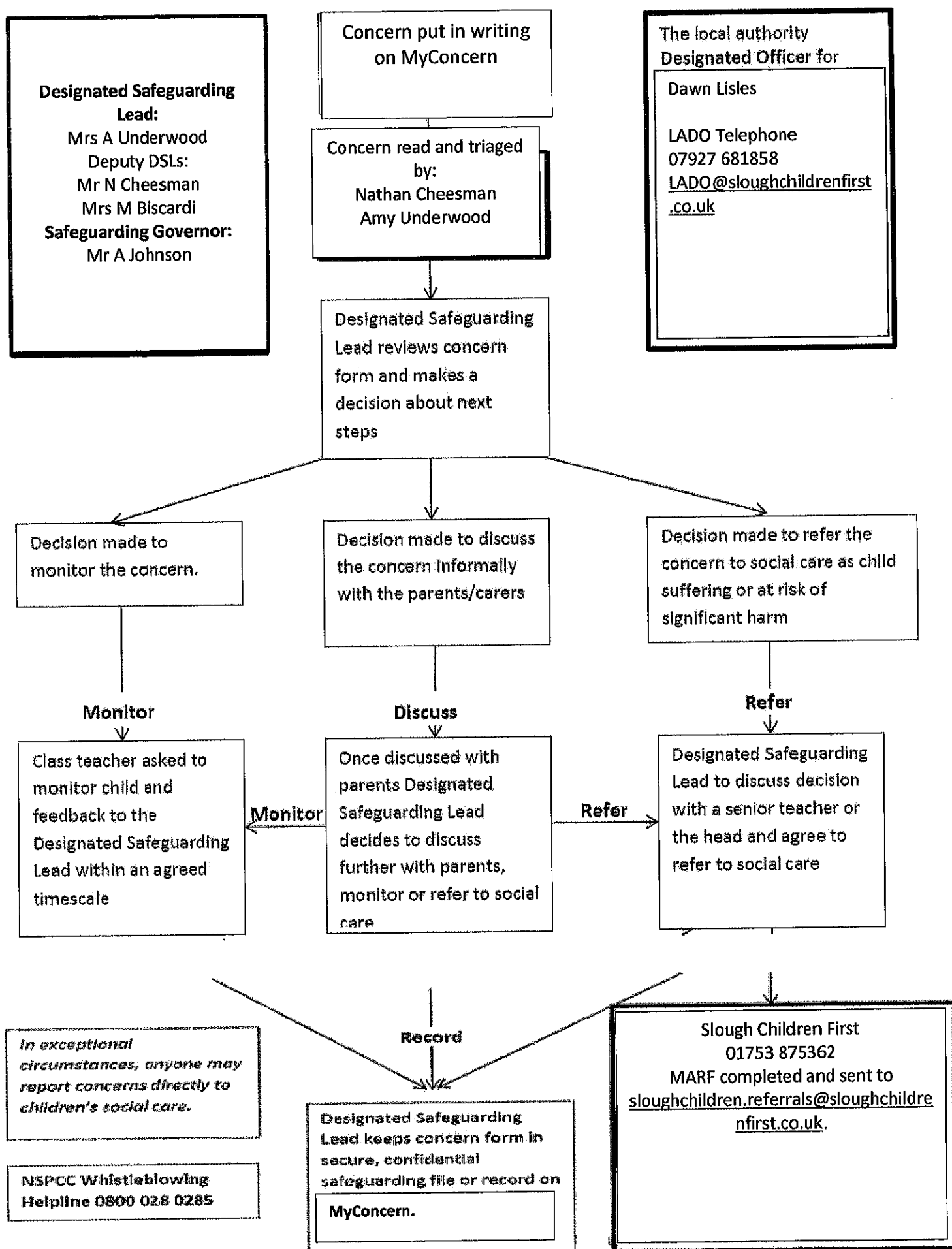
The DfE guidance that St Bernard's Prep has regard to in this policy is:

- Keeping Children Safe in Education (September 2023) (KCSIE) Change link
- KCSIE incorporates the additional statutory guidance: Disqualification under the Childcare Act (August 2018)
- KCSIE also refers to the non-statutory advice for practitioners: What to do if you're worried a child is being abused (March 2015)
- Working Together to Safeguard Children (July 2018) (WT)
- WT refers to the non-statutory but important advice: Information sharing: advice for safeguarding practitioners (2018)
- Revised Prevent Duty Guidance: for England and Wales (April 2021) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
- The use of social media for on-line radicalisation (July 2015)
- What to do if you are Worried a Child is Being Abused – Advice for Practitioners (March 2015)

Appendix 8: Related Safeguarding policies and procedures

- Allegations of Abuse against Staff/Volunteers/Governors
- Anti-bullying
- Behaviour
- Bereavement Policy
- Concerns and Complaints
- Confidentiality
- Drugs Education (found in PSHCE and Health Policy)
- Educational Visits and Activities Policy
- E-Safety
- First Aid and Accident Reporting
- Data Protection and Privacy notice
- Health, Safety and Welfare
- ICT Computing and Acceptable Internet Use
- Induction Policy
- Lost and uncollected children
- Personal and intimate care
- Physical intervention and the use of reasonable force (found within the Behaviour Policy)
- Relationships and Sex Education Policy
- Safer Recruitment
- Safety and Supervision Statement
- SEND Policy
- Special Educational Needs and Disabilities and Additional Needs
- Staff Conduct, Discipline and Grievance
- Staff Handbook
- Administration of Medication
- Whistleblowing

Appendix 9: Raising safeguarding concerns about a child and contact details



Slough Children First	01753 875362 Multi-agency referral forms (MARF) should be submitted to: sloughchildren.referrals@scstrust.co.uk
Early Help	01753 476589 sloughreferrals@sloughchildrenfirst.co.uk
Social Care out of hours service	01344 351999
Thames Valley Police	101 www.thamesvalley.police.uk (non emergency) 999 for emergency police service
Family Information Service	https://sloughfamilyservices.org.uk/kb5/sloughcst/directory/home.page
Childline Slough Safeguarding Partnership Board	0800 11 11 Business Manager – Betty Lynch safeguardingboards@slough.gov.uk
Whistleblowing and Local Authority Designated Officer (LADO)	Email: LADO@sloughchildrenfirst.co.uk Dawn Lises – 07927 681858
NSPCC Whistleblowing advice line	0800 028 0285 help@nspcc.org.uk
Education Safeguarding Officer	Jatinder Matharu 01753 875068/07714 858213 jatinder.matharu@slough.gov.uk
Prevent Coordinator	Prevent@slough.gov.uk Preventreferrals@thamesvalley.pnn.police.uk 01865 555618
Education Standard and Effectiveness Officer (SEND)	Deborah Bowers 07712 548725 Deborah.bowers@slough.gov.uk

Appendix 10: Children missing in Education form for Local Authority

'Missing' children can be vulnerable; it is essential that all services work together to identify and reengage children not engaging in education long term and transition back into appropriate education provision as quickly as possible. It is important to establish the reasons for the child missing and being absent from education at the earliest possible stage. If a child is missing from education then the relevant processes need to be followed.

Further national guidance can be found here: <https://www.gov.uk/government/publications/children-missing-education>

Details of children missing on Berkshire procedures on line can be found here:
http://www.proceduresonline.com/berks/slough/p_ch_miss_care_home_ed.html

Slough contact for children missing education is Jeannette Walker (Attendance Team Manager) Telephone: 01753 875256 Email: Jeannette.walker@slough.gov.uk

Appendix 11: Trafficked Children and Modern Day Slavery

Advice and guidance on Trafficked Children and Modern Day Slavery can be found at:

<https://www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery>

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

Appendix 12: Referrals to Children's Social Care

1. Introduction

Anyone who has concerns about a child's welfare should make a referral to Children's social care to seek advice and guidance. Referrals can be made by the child themselves, professionals such as teachers, the police, GPs and health visitors, staff from private or voluntary sector organisations as well as family members and members of the public.

Children's Social Care has the responsibility to clarify with the referrer the nature of the concerns and how and why they have arisen, and to determine the outcome agreed alongside the original referrer.

The local Threshold Criteria is the guidance that underpins this decision making.

The child must be seen by a qualified social worker within 24 hours or less if there are child protection concerns and within a maximum of 5 working days for children in need concerns. In all cases the child's needs and safety remain paramount at all times.

2. The Duty to Refer

All professionals have a responsibility to refer a child to Children's social care under section 11 of the Children Act 2004 if they believe or suspect that the child:

- Has suffered significant harm;
- Is likely to suffer significant harm;
- Has a disability, developmental and welfare needs which are likely only to be met through provision of family support services (with agreement of the child's parent) under the Children Act 1989;
- Is a Child in Need whose development would be likely to be impaired without provision of services.

When professionals make a referral to Children's social care, they should include any pre-existing assessments in respect of the child, if they have been completed. Any information they have about the child's developmental needs and the capacity of their parents and carers to meet these within the context of their wider family and environment should be provided as a part of the referral information. This should include any information that may inform contextual safeguarding concerns.

The referrer should always seek consent from parents they are referring unless to do so would put any child or young person at further risk. See **Information Sharing Procedure, National Guidance on Information Sharing** for further information on how and when to share safeguarding concerns.

The referrer will always have the opportunity to discuss their concerns with a practitioner in the first instance and should be requested to follow this up in writing.

3. Making a Referral

For all referrals to Children's social care, the child will be regarded as potentially a child in need (Children Act 1989), and the referral will be evaluated on the same day that it was received. An outcome decision will be made by a qualified social worker alongside their Team Manager within **24 hours** about the type of response that is required.

Referrals or matters of concern for a child who has an open case should be made to the relevant Children's social care team. New referrals should be made to the relevant local Children's Services initial point of contact by telephone so that a practitioner can discuss this fully with the referrer.

The referrer should provide information about their concerns and any information they may have gathered in an assessment that may have taken place prior to making the referral. The referrer will be asked for information about the following:

- Full names (including aliases and spelling variations), date of birth and gender of all child/ren in the household;
- Family address and (where relevant) school / nursery attended;
- Identity of those with parental responsibility and any other significant adults who may be involved in caring for the child such as grandparents;
- Names and date of birth of all household members, if available;
- Where available, the child's NHS number and education UPN number;
- Ethnicity, first language and religion of children and parents;
- Any special needs of children or parents;
- Any significant/important recent or historical events/incidents in child or family's life;
- Cause for concern including details of any allegations, their sources, timing and location;
- Child's current location and emotional and physical condition;
- Whether the child needs immediate protection;
- Details of alleged perpetrator, if relevant;
- Referrer's relationship and knowledge of child and parents;
- Known involvement of other agencies / professionals (e.g. GP);
- Information regarding parental knowledge of, and agreement to, the referral;
- The child's views and wishes, if known.

Other information may be relevant and some information may not be available at the time of making the referral. However, there should not be a delay in order to collect information if the delay may place the child at risk of significant harm.

Once a referral is received by telephone a written follow up must be required if agreed by the referrer and the receiving social worker. In all cases the information provided by the referrer and any actions agreed, will be written up by the social worker. Feedback should be given by local authority children's social care to the referrer on the decisions taken. Where appropriate, this feedback should include the reasons why a case may not meet the statutory threshold and offer suggestions for other sources of more suitable support. Practitioners should always follow up their concerns if they are not satisfied with the local authority children's social care response and should escalate their concerns if they remain dissatisfied.

The parents should be advised and their consent sought before a referral is made about them with other agencies, unless seeking consent places a child at risk of significant harm. Where a professional decides not to seek parental consent before making a referral to Children's social care, the decision must be recorded in the child's file with reasons, dated and signed and this will be confirmed in the referral to Children's social care.

All referrals from professionals must be confirmed in writing, by the referrer, within 24 hours if requested by Children's social care, otherwise all information will be documented on the referral record. The referrer should receive an acknowledgement within three working days of the outcome and if not received they should contact Children's social care.

4. Receiving a Referral

A practitioner will discuss the concerns with the referrer and is required to consider any previous records in relation to the child and family in their agency. The practitioner will establish:

- The nature of the concerns, including levels of risk and need;
- How and why they have arisen;
- Any mitigating factors;
- If the threshold for a Children's Social Care referral is met;
- Advise if other outcomes are more appropriate, including Early Help;
- The child's views, if known;
- What the child's and the family's needs appear to be;
- Whether the family are aware of the referral and whether they are in agreement with it or not;
- Whether the concern involves abuse or neglect; and
- Whether there is any need for any urgent action to protect the child or any other children in the household or community.

A decision to discuss the referral with other agencies without parental knowledge or permission can only be authorised by a Children's social care manager, and the reasons recorded. This checking and information gathering stage must involve an immediate assessment of any concerns about either the child's health and development, or actual and/or potential harm, which justify further enquiries, assessments and / or interventions, including Child Protection.

Interviews with the child, if appropriate, should take place in a safe environment and follow the statutory requirements under Working Together to Safeguard Children and the best practice guidance of 'Achieving Best Evidence'. All interviews with children and family members should take account of the children and families' communication methods i.e. be undertaken in their preferred language and where appropriate for some people by using non-verbal communication methods such as Makaton or BSL.

The Children's social care manager will maintain management oversight of assessment and will authorise the decision to initiate action. If the child and / or family are known to professional agencies or the facts clearly indicate that a Section 47 Enquiry is required, Children's social care will initiate a strategy meeting/discussion immediately (Children Act 1989, Working Together to Safeguard Children), and together with other agencies determine what threshold is met and what subsequent actions are required how to proceed.

The police will be informed if a crime may have been committed through strategy discussion. The police will determine their level of intervention alongside Children's Social Care through strategy discussion and subsequent strategy meetings (Children Act 1989, Working Together to Safeguard Children 2018).

5. Concluding a Referral

At the end of the referral discussion, the referrer and Children's social care should be clear about the proposed action, who will be taking it, timescales and whether no further action will be taken. This will be fully recorded in the referral record.

Potential outcomes may include:

- No further action, which may include information to signpost to other agencies;
- Early help - referrals for intervention and prevention services within the local authority's Early Help services range of provision;
- Identity of lead professional;
- Back to referrer;
- Child in Need services - assessment to be undertaken by Children's Social Care (Section 17 CA 1989);
- Looked After Child status;
- Child Protection services – assessment and child protection enquiries to be undertaken by Children's Social Care (Section 47 CA 1989) with active involvement of other agencies such as the police.

This decision must be made in **24 hours** and approved by a Manager (Social Worker Manager or MASH Manager in areas where it has been established).

The practitioner should inform, in writing, all the relevant agencies and the child, if appropriate, and family of their decisions.

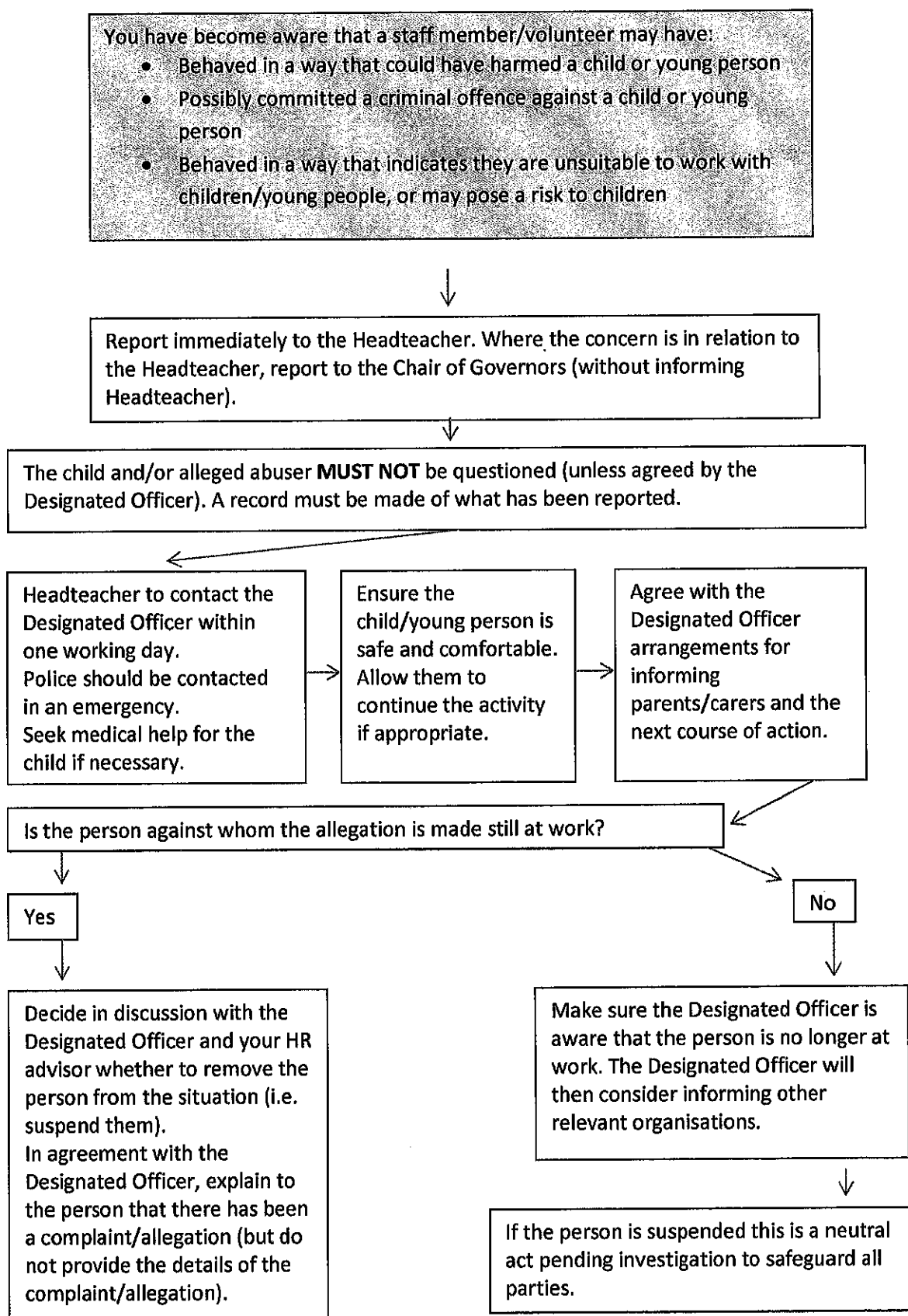
In the case of referrals from members of the public, feedback must be consistent with the rights to confidentiality of the child and their family.

If the referrer disagrees with the decisions made by Children's social care about the outcome of the referral, they may consider making a complaint under the local Complaint procedure or raise the matter under the local Professional Disagreement Protocol.

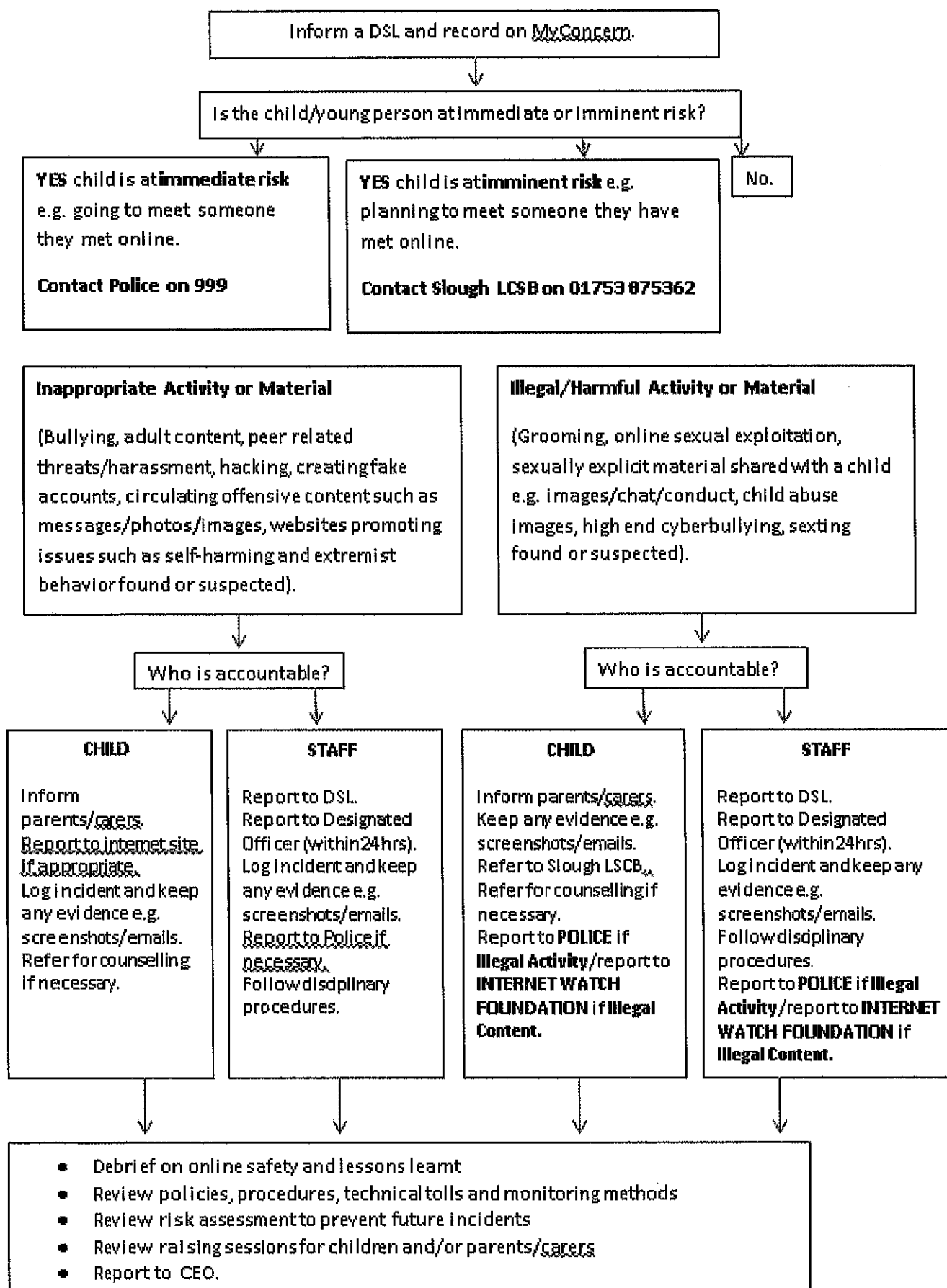
The child and parents will be routinely informed about local procedures for raising complaints, if they wish to, and local advocacy services, including being given a leaflet at first visit.

Where the outcome of the referral leads to a Children's Social Care single assessment see **Single Assessment Procedure**.

Appendix 13: Dealing with an Allegation of Child Abuse against an Employee, Volunteer or Any Other Person Working at a School



Appendix 14: Online Safety Incident Raised by a Child/Young Person or Member of Staff



Appendix 15: Disqualification from Teaching in EYFS

St Bernard's follows the legal guidelines that it is an offence for the School to employ anyone in connection with our early years or later year's provisions with children up to the age of eight who is disqualified from doing so. This applies to normal School activities and any before or after School clubs or activities. It is also a criminal offence for a disqualified person to provide early or later year's provision or to be directly concerned in its management.

The criteria for which a person will be disqualified from working in connection with early or later year's provision are not only that a person is barred from working with children (by inclusion on the Children's Barred List) but also include:

- Having been cautioned for, or convicted of, certain violent and sexual criminal offences against children and adults;
- Any offence involving death or injury to a child.
- Various grounds relating to the care of children, including where an order is made in respect of a child under the person's care;
- Having had registration refused or cancelled in relation to childcare or children's homes;
- Having been disqualified from private fostering;

After making this declaration staff will be under an on-going duty to inform the school if their circumstances change in a way which would mean they subsequently meet any of the criteria for disqualification. Any failure to disclose relevant information now, or a future change in circumstances, will be treated as a serious disciplinary matter and may lead to dismissal for gross misconduct.

Appendix 16: Low Level Concerns Procedure



ST BERNARD'S PREPARATORY SCHOOL **LOW LEVEL CONCERNS PROCEDURE**

1. Purpose

1.1 This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

1.2 The policy should be read in conjunction with the current statutory guidance – 'Keeping Children Safe in Education 2023'

2. Who does the policy apply to?

2.1 This policy applies to all staff and other individuals who work or volunteer in school.

3. Definition of a low-level concern

3.1 A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the "Guidance for safer working practice" (May 2019), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

3.2 Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

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

3.3 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.

3.4 It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded on Confide and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

4. Reporting low-level concerns

4.1 Where a low-level concern has been identified, this will be reported as soon as possible to the Headteacher and then recorded on Confide. However, it is never too late to share a low-level concern if this has not already happened.

4.2 Where the Headteacher is not available, the information will be reported to the Designated Safeguarding Lead or Deputy Designated Safeguarding lead in the DSLs absence and then recorded on Confide.

4.3 Low-level concerns about the Designated Safeguarding Lead will be reported to the Headteacher and those about the Headteacher will be reported to the Chair of Governors.

4.4 Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Headteacher of the details as soon as possible.

5. Recording concerns

5.1 A summary of the low-level concern should be recorded on Confide. Details including date, time and any factual information or observations, should be recorded on Confide as soon as possible after the matter has been reported to the Headteacher or the DSLs.

5.2 Where concerns are reported verbally to the Headteacher a record of the conversation will be made by the Headteacher. This will be uploaded on to Confide.

6. Responding to low-level concerns

6.1 Where a low-level concern has been raised this will be taken seriously and dealt with promptly.

The Headteacher will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses
- The information reported, gathered and recorded on Confide will then be reviewed to determine whether the behaviour:
 - i. is consistent with the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019): no further action will be required
 - ii. constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Performance Management Policy or Disciplinary Policy

- iii. is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken.
 - iv. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed
 - v. when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
- Records will be made on Confide of:
 - i. all internal conversations including any relevant witnesses
 - ii. all external conversations, e.g. with the LADO
 - iii. the decision and the rationale for it
 - iv. any action taken.

7. Can the reporting person remain anonymous?

7.1 The person bringing forward the concern will be named in the record on Confide. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

8. Should staff report concerns about themselves (ie self-report)?

8.1 It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the "Guidance for safer working practice". In these circumstances they should self-report via Confide. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

9. Where behaviour is consistent with the "Guidance for safer working practice" (May 2019)

9.1 Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

10. Should the low-level concerns file be reviewed?

10.1 The records on Confide will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

11. References

11.1 Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

12. What is the role of the Governing Body?

12.1 The Headteacher will regularly inform the Governing Body about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data from Confide. The Safeguarding Governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

