COTTESMORE SCHOOL

Child Protection & Safeguarding Policy

September 2026

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Appendix 1

CATEGORIES OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

1. Definition
2. Risk factors
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Appendix 2

Flow chart for raising safeguarding concerns about a child

1. INTRODUCTION

This policy applies to all pupils in the school, including those in the EYFS. It is reviewed annually in conjunction with the Proprietor, and the review includes its effectiveness in practice. It is also reviewed in the event of an incident or change in legislation, and any remediation necessary in policy or procedures is given immediate effect.

It pays due regard to:

- *Keeping Children Safe in Education (KCSIE) (September 2026)*
- *Working Together to Safeguard Children (WT) (2018 updated July 2022)*
- *Independent School Standards Regulations (2014)*
- *Prevent Duty Guidance (2015 updated 2021)*
- *Statutory Framework for the Early Years Foundation Stage (2021)*
- *Advice and guidance from West Sussex Safeguarding Children Partnership*

Other policies which are integral to the school's overarching approach to safeguarding link closely with this policy. These include but are not limited to: Mobile Phone & Camera Policy; Promoting Good Behaviour Policy; Anti-bullying Policy; Anti-Cyberbullying and Online Safety Policy; First Aid Policy & Procedures; Independent Listener Policy; Health and Safety Policy; Safer Recruitment Policy; Staff Code of Conduct; Relationships & Sex Education Policy; Confidential Reporting Policy (Whistleblowing); PSHE Policy.

2. APPLICATION

This policy applies to all members of staff and volunteers, is available to parents on request and is published on the school's website.

It applies at all times, including when pupils are away from the school site e.g. on an educational visit. When the word 'staff' is used, it applies to all adults within the school including staff, the proprietor and governance advisors, supply and self-employed staff, third –party staff, contractors, volunteers, students and those on work experience.

3. KEY PERSONNEL

3.1 SCHOOL STAFF

Designated Safeguarding Lead (DSL)

David Revill – d.s.l@cottesmoreschool.com

Deputy Designated Safeguarding Lead (DDSL)
DDSL - Tom Rogerson - rogersont@cottesmoreschool.com
DDSL – Charlotte Rogerson – rogersonc@cottesmoreschool.com
DDSL - Mary-Anne Revill - revillm@cottesmoreschool.com
DDSL (EYFS) - Sophie Baker - bakers@cottesmoreschool.com
DDSL (EYFS) – Tammy O'Grady - ogradyt@cottesmoreschool.com

Proprietor
Tom Rogerson – rogersont@cottesmoreschool.com

Governance Advisor responsible for Safeguarding
Amelia Calvert – calverta@cottesmoreschool.com

For all school contacts call the school office - 01293 520648

3.2 CONTACT DETAILS OF WEST SUSSEX CHILD SERVICES

For all concerns about pupils (including concerns about radicalisation)

Integrated Front Door (IFD) of West Sussex County Council:

- **Telephone: 01403 229 900 • Out of Hours: 0330 222 6664**
- **WSChildrenservices@westsussex.gov.uk**

All enquiries/referrals for children both for Social Care and Early Help are made through one access point referred to as the Integrated Front Door (IFD). The IFD for West Sussex Children Services ensures that all enquiries and referrals are triaged upon receipt and directed to the appropriate service. Please note concerns should be referred to the Local Authority where the child lives if this is not West Sussex

For concerns about the conduct of staff or other adults in the school referrals must go to the LADO for West Sussex

LADO West Sussex – Miriam Williams, Donna Tomlinson & Victoria Adams

TEL: 0330 222 6450 Email: lado@westsussex.gov.uk

Other relevant contacts

Children Missing Education Team (03302 222059)

Safeguarding in Education: 03302 224030
EMAIL: safeguarding.education@westsussex.gov.uk

West Sussex Safeguarding Children Partnership wschildrenservices@westsussex.gov.uk

Sussex Police Prevent Team/ Channel Tel 101 www.sussex.police.uk

West Sussex local offer - https://westsussex.local-offer.org/services/731

The policy of the school requires that all referrals about pupils are made by the school's DSL; however, anybody can make a referral and in exceptional circumstances staff may report concerns directly with West Sussex IFD, see contacts above.

If, at any point, there is a risk of immediate serious harm to a pupil a referral should be made to IFD or the police on 999 immediately.

Please see Appendix 2 to read the document entitled *Flow Chart for Raising Safeguarding Concerns*

4. POLICY STATEMENT

Cottesmore School fully recognises its responsibilities for child protection and that every child has the right to protection from abuse and exploitation, including through the use of technology. Cottesmore School recognises its duties to all children, including children in need and children at risk of harm.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all staff should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

5. POLICY AIMS

This policy aims to:

- ensure that effective safeguarding procedures are in place and are followed by all staff in accordance with national guidance and the locally agreed inter-agency procedures of West Sussex Partnership.
- promote effective working relationships with other agencies.
- have clear procedures for staff to follow if they have any concerns about pupils or the conduct of colleagues or other adults in school,
- ensure effective training for all staff

- identify, monitor and support those pupils who may be in need of Early Help including support from other agencies apart from Children's Services e.g., Child and Adolescent Mental Health Services (CAMHS)
- ensure, through appropriate filtering and monitoring systems, that pupils are safeguarded in school from potentially harmful and inappropriate online material
- ensure children are taught about keeping themselves safe, including when using technology of any kind, and to enable them to recognise when they are at risk and how to get help.
- support all pupils, and for relevant pupils in accordance with any child protection plans
- establish and maintain an environment where children feel secure, can learn and develop, are encouraged to talk, and are listened to.
- ensure children know that there are adults in the school whom they can approach if they are worried.
- ensure there are opportunities in the PSHE/RSE and wider curriculum for children to develop the skills they need to recognise and stay safe from abuse, including through the use of technology.
- identify one person to take lead responsibility for safeguarding throughout the school (DSL)
- ensure that all staff are recruited in accordance with statutory guidance and the School's Recruitment Policy.

6. ROLE AND RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEAD (DSL)

The school has appointed a Designated Safeguarding Lead (DSL) and five Deputy Designated Safeguarding Leads (DDSL), all have the necessary status, training and authority to be responsible for matters relating to the welfare of pupils, including child protection. In accordance with the Early Years Foundation Stage (EYFS) statutory framework, a DDSL has specific oversight of safeguarding pupils within the EYFS.

Deputy DSL

a) All Deputies are trained to the same level as the DSL and in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on his return.
b) The ultimate lead responsibility for safeguarding and child protection rests with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

During term time, the DSL and/or the Deputy DSL are available during school hours, either in school, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns. There will always be cover for this role if the DSL is away for any reason; the Headmaster is also a Deputy DSL.

The main responsibilities of the DSL are:

a) To promote a culture of safeguarding so the welfare and best interests of children is embedded within all the school's processes and procedures
b) To ensure that every member of staff knows the name of the DSL and their role.
c) To ensure that staff exercise professional curiosity regarding safeguarding.
d) To maintain an induction and regular training programme for all members of the school's staff and volunteers in line with the procedures of West Sussex SCP
e) To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
f) To ensure that all staff have confirmed that they have been provided with a copy of the School's Safeguarding Policy (i.e. this document), KCSIE and Annex B and have read and understood them
g) Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters, including attendance at case conferences.
h) To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and the 'Early Help' process
i) Immediately on receipt of any concerns, to take the necessary action.
j) To provide a systematic means of monitoring and supporting pupils known or thought to be at risk of harm or where there are ongoing concerns
k) To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked-after children.
l) Notify Children's Services immediately if there is any unexplained absence of a pupil who has previously been referred or who has current involvement with Children's Services. A pupil's social worker must be informed of all absences.
m) Keep detailed, accurate written records of concerns about children showing a clear chronology and action taken, even when there is no need to make a referral to another service.
n) The School Nurse keeps a record of physical injuries and any of a safeguarding nature are immediately passed on to the DSL; (Note - if a pupil who is registered with the School Doctor attends an Accident and Emergency Department, a record of that visit is sent to the School Doctor.)
o) Keep records separate from the main pupil file. All records are kept separate, confidential and securely. Keep detailed, accurate, secure, written records of referrals or concerns. Paper files of individual concerns and referrals are stored in a locked filing cabinet with only access by the DSL. Hard copies of individual concerns and referrals are also stored online with DSL and Deputy DSL's having access.
p) Where a pupil leaves the School, ensures that the safeguarding file is transferred to the new school within 5 days for an in-year transfer or within the first 5 days of the start of a new term and receipt of transfer is obtained. If a pupil leaves and the future school is not known, the DSL will inform West Sussex via the Children Missing Education Team.
q) To ensure that a record of any safeguarding information is obtained from any previous school or nursery for a new pupil joining the school
r) To ensure the Head is informed about any safeguarding concerns immediately, including any referrals

s) To ensure the Safeguarding Policy is reviewed at least annually in conjunction with the Head and the Proprietor, and also following any incident or change in legislation, with any remediation necessary given immediate effect
t) To be responsible for overseeing online safety in the school with the support of the school's IT manager
u) Attend any relevant or refresher training courses and ensure that any new or key messages are passed to other staff and governors.
v) To ensure the current Safeguarding Policy is available on the school's website

7. RESPONSIBILITIES OF STAFF

a) to provide a safe and supportive learning environment
b) to read and understand, Part 1 of Keeping Children Safe in Education and Annex B
c) to read and understand the School's Safeguarding Policy and Procedures i.e. this document
d) to adhere to the school's Staff Code of Conduct
e) to undertake regular safeguarding training, at least annually
f) to be alert to the signs of abuse and neglect, including child-on-child abuse, and to report any concerns to the DSL immediately
g) To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
h) to help pupils understand how to keep themselves safe and manage risk
i) to be alert to absenteeism of any pupils and inform the DSL of any concerns.
j) to consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding)
k) to report to the Head any concerns about the conduct of adults, including low level concerns (this includes behaviour outside school that might indicate an individual is unsuitable to work with children)

8. RESPONSIBILITIES OF THE HEAD

a) To promote an overarching culture of safeguarding so the welfare of children is embedded within all the school's processes and procedures.
b) To have read and understood all parts of KCSIE thereby ensuring that the school's policy and procedures follow statutory guidance.
c) To ensure that KCSIE Part 1 (including Annex B) and the school's Safeguarding Policy are understood and implemented effectively by all staff.
d) To allocate sufficient time, training and resources to enable the DSL and Deputy to carry out their roles effectively.
e) To ensure there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout the school.

f) To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the school's procedures.
g) To ensure pupils are taught about keeping safe, including online
h) To ensure online safety is integrated into the school's overarching approach to safeguarding.
i) To ensure online safety is reflected as required in all relevant policies and appropriately considered when planning the curriculum, staff training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.
j) To ensure the school's IT systems have appropriate filters installed, without unduly restricting access for educational purposes, and to review their effectiveness regularly
k) To ensure that the leadership team and relevant staff have an awareness and understanding of the online safety provisions in place, manage them effectively and know how to escalate concerns when identified.
l) To ensure systems are in place, which are easily understood and easily accessible for pupils to report any concerns, including abuse.
m) To deal with any reports regarding concerns or allegations related to the conduct of adults in accordance with statutory guidance (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns
n) to seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults
o) To ensure that the school holds at least two emergency contact numbers for each child.
p) To ensure that safer recruitment procedures are followed in accordance with Part 3 of KCSIE and that all relevant checks are carried out on all staff before starting their employment and recorded in the school's Single Central Record (SCR).
q) To undertake training on safer recruitment processes at regular intervals
r) To have policies and procedures in place relating to the use of cameras and technology within the EYFS.
s) To ensure the Safeguarding Policy is reviewed at least annually in conjunction with the Proprietor, and also following any incident or change in legislation, with any remediation necessary given immediate effect

9. RESPONSIBILITIES OF THE PROPRIETOR

The main responsibilities of the proprietor are to:

- ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of pupils at their heart.
- ensure policies, procedures and training are effective and comply with the law at all times.
- ensure the Proprietor has the required knowledge, skills and expertise to take leadership responsibility for the school's safeguarding arrangements.
- ensure there is an effective Safeguarding Policy in place, which is consistent with statutory guidance and the requirements of West Sussex Safeguarding Children Partnership.
- ensure the current Safeguarding Policy is available publicly on the school website.
- ensure child protection files are maintained, which show a clear chronology and the reason for decisions taken
- ensure appropriate filtering and monitoring systems are in place and regularly review their effectiveness.
- ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified
- ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to, a Staff Code of Conduct, Anti-bullying Policy, Behaviour Policy, Relationships & Sex Education Policy.

9.1 Proprietorial Oversight

The Proprietor undertakes an annual review of safeguarding which includes a review of the school's Child Protection & Safeguarding Policy and procedures and checks the efficiency with which the related duties have been discharged. This also occurs following any incident or change in legislation, with any remediation necessary given immediate effect

The Proprietor is kept informed by the DSL and Headmaster of any safeguarding issues. She attends all Governance Advisors meetings where safeguarding is covered.

10. WHAT STAFF SHOULD LOOK OUT FOR

A full list of the categories of abuse and other specific safeguarding issues may be found in Appendix 1 and in KCSIE Part 1 and Appendix B.

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

understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Staff see children regularly and know them well, so are in a unique position to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive. It is important that staff strive to build trusted relationships with children which facilitates communication.

Safeguarding concerns may arise through general observations, through children's play or behaviour or from information from parents, children, or other staff. Concerns may also be raised about a parent/carer's interaction with a pupil or issues such as parental alcohol misuse, domestic abuse or mental health.

Staff must be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated, or could be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This must not prevent staff from having a professional curiosity and speaking to the DSL if they have any concerns whatsoever.

Regular meetings of staff who are responsible for the care and welfare of the children take place, and any unhappiness, distress or abnormal behaviour in a child must be raised at these meetings. Staff have a responsibility for sharing information that is relevant to the welfare of pupils. Staff are encouraged to be alert for any of the following :

- abnormal behaviour, including changes in character or performance
- aggressive behaviour
- changes in eating pattern, loss of appetite or excessive preoccupation with food
- loss of self-esteem
- onset of attention seeking, disobedience or aggression
- severe sleep disturbances and nightmares, especially with sexual content
- bed-wetting with boarding children particularly
- mental health problems
- any words or actions indicating any problems, other than minor ones, at home or in school, including inconsistencies between parental explanations and those from children
- any physical sign such as bruising, unexplained bleeding, difficulty in any normal bodily functions and any aches or pains which seem to have no physical cause
- signs of self-harm
- Children who display knowledge or interest in sexual acts inappropriate to their age
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have
- Children who ask others to behave sexually or play sexual games
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy

- any hints from children about sexual activity or abuse of any kind amongst the children or from a member of staff on a child.

11. WHAT STAFF SHOULD DO IF THEY HAVE ANY CONCERNS ABOUT A PUPIL OR IF A PUPIL MAKES A DISCLOSURE

If a member of staff has any concerns, however minor they may appear, they must report the matter to the DSL as soon as possible and no later than the same school day. ***In many safeguarding cases it is not one major incident which triggers a referral, but a pattern of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.***

All concerns must be recorded in writing even if the initial contact with the DSL or DDSL is made in person.

The DSL may be contacted via any of the routes listed below

- 'Concern Forms': A4 sheets that can be found on the Child Protection board in the staff room (paper format)
- Wellbeing Manager (on ISAMs): for pastoral concerns. This is directed to the DSL via email and ISAMs (electronic format)
- Email: d.s.l@cottesmoreschool.com or revilld@cottesmoreschool.com
- In person to DSL or a DDSL in his absence

11.1 Recording safeguarding concerns

a) Abuse and neglect are complex issues and are rarely stand alone events; therefore, they require effective recording, reporting and monitoring systems.
b) All safeguarding concerns must be recorded using the mechanisms listed above.
c) If the DSL is not available for any reason the Deputy DSL must be contacted to deal with the concern initially.
d) With regard to any conversations directly with a pupil or overheard, staff must keep a written record of the conversation and concerns arising.
e) The record should include the date, time and place of the conversation, who was present and what was said by the pupil. The record should use names, not initials, for all references to people.
f) The record should be specific. Record actual behaviour and language used by a pupil rather than more vague terms such as inappropriate language/behaviour.

g) Staff should make the record as soon as possible after speaking to the pupil so the pupil is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the pupil's own words.
h) The record should contain facts and information only, taking care to avoid personal opinion.
i) Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.
j) If more than one member of staff is present when a pupil discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report.
k) The report must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.
l) It is important to record all concerns regarding the welfare of pupils, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.
m) Staff must not investigate further or speak to parents or other staff. They must contact the DSL who will then determine the next course of action.

11.2 What staff should do if a child discloses information.

Always stop and listen straight away to someone who wants to tell you about any concerns, problems or suspicions of abuse.

The member of staff should:

- **Listen carefully** and keep an open mind. Do not make a decision as to whether or not abuse has taken place. When the pupil has finished talking, make sure that he/she feels secure and, if appropriate, explain what you are going to do next.
- **Reassure** the pupil, if they have made a disclosure, that he/she is right to tell and is not to blame. A pupil must never be given the impression that they are creating a problem by reporting abuse. Nor should a pupil ever be made to feel ashamed for making a report.
- **Do not promise confidentiality**. Explain that you must make sure that the pupil is safe and you will need to ask other adults to help you to do this.

- **Do not ask leading questions,** that is, a question which suggests its own answer e.g. "Did they do X to you?" ask instead open questions like "What do you want to tell me?" or "Is there anything else I ought to know?" or "Can you tell me what happened? Let the pupil tell you what they want to and no more. The pupil may be interviewed

by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract information.

- **Record exactly what was said** Do not take notes while the child is talking as this may prevent them from speaking freely. As soon as the conversation is over, and before speaking to anyone else, write down exactly what was said using the pupil's own words as much as possible. Keep these original notes, however rough, even if you wrote on the back of something else (it is what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards). Always date the notes.
- **Be prepared to follow up** with the pupil, but only in conjunction with advice from the DSL.
- **Be aware that** younger pupils may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- **Do not attempt any examination** or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. It may be possible to observe the pupil during the normal school routine, for example in a physical education (PE) class. If a pupil wants to show you his or her injuries, make sure that a colleague is with you as a witness. Try to arrange for one of you to be the same sex as the pupil

- **Do not attempt to investigate** matters further; your role is to listen, record and report your concerns to the DSL.. Children's Services and the police are trained to do this; you could cause more damage and hinder any possible criminal proceedings.
- **Immediately inform the DSL**, unless he is accused, in which case you should inform the Head. The DSL will take the appropriate action depending on what the child disclosed.. You should not tell other staff, parents or any other adults or children what you have been told.
- **Discuss with the DSL** whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you).
- **Never think abuse is impossible at Cottesmore**, or that an accusation against someone you know well and trust is bound to be wrong.
- **Children often tell other young people,** rather than staff or other adults, about abuse. It is therefore important to take seriously reports from other pupils and make sure that prefects and other older pupils are aware of relevant points on this sheet. This is included in the 5th and 6th Form PSHE/RSE programme. Dorm Monitors are reminded termly of their responsibilities.

11.3 What staff should do if online evidence is found

a) All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.
b) If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.

c) Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as this is a criminal offence.
d) If the imagery has already been viewed by accident (e.g. if a pupil has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
e) Do not delete the imagery or ask the pupil to delete it.
f) Do not ask the pupil(s) involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
g) Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
h) Do not say or do anything to blame or shame any pupil(s) involved.
i) Do explain that you need to report it and reassure them that they will receive support and help.
j) Report the matter to the DSL immediately

Also see:

DfE Searching Screening and Confiscation Advice for schools (September 2022)

DfE Sharing nudes and semi-nudes: how to respond to an incident. (December 2020)

12. ACTION BY THE DSL ON RECEIPT OF A CONCERN ABOUT A CHILD

On receipt of the safeguarding report, the DSL must make a written record of the decisions made and action taken.

Action will depend on the nature of the concern. It may include one or more of the following:

- monitoring the pupil in school
- a discussion with parents
- early help intervention from the school and/or another agency
- referral to West Sussex IFD
- referral to the LADO
- report to the police
- The DSL is also aware of the requirement, in specific circumstances, for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – Police and Criminal Evidence Act (PACE) Code C 2019
- Where a child has an allocated social worker, the DSL will liaise with the virtual school head who has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

The member(s) of staff making the report will be informed by the DSL of the action taken, although additional information will only be shared with members of staff on a need to know basis.
If the pupil's situation does not appear to improve, the staff member with concerns should request the DSL to re-consider the action taken.

It is important that children receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- Identify and refer **any concerns** about a child
- listen to the views of the child
- keep clear written records
- reassess concerns if the child's situation does not improve
- share information quickly and challenge inaction

13. CHILD PROTECTION RECORDS

a) Safeguarding records are kept securely by the DSL.
b) There is a clear, detailed chronology for each pupil where concerns have been raised.
c) Written records are kept of all concerns, whether or not there is a need to refer the matter to Children's Services or another agency.
d) If a referral to Children's Services is thought to be required, the DSL will usually contact the local authority for advice prior to notifying parents.
e) All discussions with the local authority along with the decisions made and the reasons for those decisions are recorded in writing.
f) Minutes of any case conferences or discussions with social workers or other professionals involved with the pupil will be retained in the pupil's file.
g) Any new concern or information about a pupil who has active involvement with Children's Services must be passed to the pupil's allocated social worker without delay.
h) Any new concern or information about a pupil who has had previous involvement with Children's Services must be passed to Children's Services without delay.
i) If a pupil moves to another school, all child protection records are transferred securely, within 5 days, to the DSL at the new school and a receipt is obtained confirming they have been received. Parental permission is not required for records to be shared with the new school.
j) Duplicate records must be retained. Duplicate records will be kept securely until the pupil reaches the age of 25 years.
k) On a case by case basis the DSL will also consider sharing information proactively with the new school to ensure key staff are aware of the pupil's needs and can have any support in place when the pupil arrives.
l) Safeguarding records will be requested from previous schools/nurseries for any new pupils joining the school.

13.1.Reports for Child Protection Conferences

Reports prepared for child protection conferences should focus on the pupil's:

- Educational progress and achievements
- Attendance
- Behaviour
- Participation
- Relations with other children and young people
- Appearance, where appropriate
- Interaction with other children and adults.

If relevant, reports should include what is known about the pupil's relations with his or her family and the family structure. Reports should be objective and based on evidence. They should distinguish between fact, observation, allegation and opinion. The School should:

- Make reports available to the pupil's parents prior to the child protection conference.
- Provide written reports to the child protection conference.
- Arrange for an appropriate person from the school to attend the child protection conference.

14. INFORMATION SHARING

Information will be shared according to the HM Government guidance: Information Sharing (July 2018.)

The guidance states that practitioners should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. ***Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.***

The guidance states that the information shared should be:

(a) **Necessary and proportionate** - Any information shared must be proportionate to the need and level of risk.
(b) **Relevant** - Only information that is relevant to the purposes should be shared with those who need it.
(c) **Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
(d) **Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
(e) **Timely** - Information should be shared in a timely fashion to reduce the risk of harm.
(f) **Secure** - Wherever possible, information should be shared in an appropriate, secure way.

(g) **Record** - Information sharing decisions should be recorded whether or not the decision is taken to share.

15. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES OR PHYSICAL HEALTH ISSUES

Staff are made aware that children with special educational needs and/or disabilities as well as other vulnerable groups may be especially at risk of abuse. Such children are also more prone to peer group isolation or bullying. Therefore, extra care should be taken to correctly interpret apparent signs of abuse or neglect, acknowledging that behaviour, mood or injury may relate to possible abuse and not the SEN or disability. Staff should be aware that:

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

16. CONTINUUM OF NEED

West Sussex Continuum of Need threshold document may be accessed here. The document gives clear guidance on how concerns about children will be triaged.

16.1 Early Help

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves

- is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs or abuse and/or neglect
- is at risk of being radicalised or exploited
- has a family member in prison or is affected by parental offending
- is experiencing, or is at risk experiencing family ostracism
- is at risk of 'honour' based abuse such as FGM or forced marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

Early help means providing support as soon as a problem emerges at any point in a child's life, from the Foundation years through to the teenage years. In the first instance, staff who consider the pupil may benefit from early help should discuss this with the school's DSL. The DSL will consider the appropriate action to take in accordance with the threshold guidance published by the WSSCP. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

If the DSL is not available, staff should speak to a Deputy DSL or a member of the SLT and/or take advice from Children's Services.

16.2 West Sussex Threshold Levels 3 (complex needs) and 4 (specialist/acute)

a) Pupils who meet the threshold of Level 3 or Level 4 will be referred to West Sussex IFD immediately by the DSL.
b) If there is ever any doubt about whether a referral should be made advice will be sought from the West Sussex IFD.
c) The DSL may also take initial advice and discuss matters with other services such as the Education Welfare Officer, CAMHS or the police. Under no circumstances will the situation be left beyond the day that the concern is first raised.
d) If a referral is made or advice is obtained from Children's Services, the Head will be informed of the case by the DSL as soon as possible.
e) A written record of all telephone conversations with Children's Services, the LADO or other local authority officers are made by the DSL.
f) The DSL will discuss the concerns with the pupil's parents/carers at the earliest appropriate opportunity.
g) The DSL will assist other agencies to make enquiries into concerns about a pupil's welfare. This will include ensuring that the school is represented at multi-agency meetings, including child protection conferences, and that reports/information about the pupil are provided as required.

h) In cases of extreme emergency or if a serious criminal offence appears to have been committed the police will be contacted immediately.
i) The referral process outlined is also followed when there are concerns about a pupil who may be at risk of radicalisation. The level of risk will identify the most appropriate referral, which could include Children's Services and/or Channel. (Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.)

The policy of the school requires that all referrals are made by the school's DSL; however, anybody can make a referral and in exceptional circumstances staff may raise concerns directly with Children's Services. If, at any point, there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services or the police on 999 immediately.

17. BOARDING

Boarding staff, including matrons, are trained to a high level in safeguarding as we, as a school, are aware that children may disclose an issue outside of school hours. Also as children are in the boarding staff's constant care, they may notice a change in the child's appearance, demeanour, health and diet and/or general well-being. The boarding staff have a weekly meeting so that any children of concern can be raised and any follow ups with the DSL can be sought quickly. The school nurse is available for medical guidance, as well as access to a school doctor, relating to any safeguarding issues.

All children are able to talk to the boarding team, and any other member of staff, if they notice changes in their peers that are concerning them.

All boarders and day boarders are taught, during PSHE and RSE, awareness of safeguarding issues concerning their peers and encouraged to seek an adult if they have any worries. Discussions may also continue during boarding hours and a member of staff (including the Independent Listener) is always available to talk to the children.

18. COMMUNICATION WITH PARENTS/CARERS

a) All parents are aware from the publication of this policy on the school's website that the school has a safeguarding policy and is required to follow statutory guidance in respect of reporting to Children's Services any case of suspected abuse.
b) From this policy and from notices in the school buildings, parents are made aware of the identities of the DSL and Deputy DSLs with whom they may discuss concerns.
c) The school will work with parents and outside agencies to help support pupils and their families; however, it will always put the duty of care to the pupil as its priority and will refer concerns if it considers a pupil is or may be at risk of harm or has suffered harm.
d) The DSL will normally request a meeting with the parents of the pupil about whom there are concerns to discuss the matter. He will explain the reasons for the school's concerns and the course of action the school intends to take.

e) Referrals to Children's Services or the LADO (or initial advice from either service) do not require prior parental consent. The DSL must act in in the best interests of the pupil, even if this results in making a referral against the parents' wishes.
f) If the DSL believes that notifying parents might in any way exacerbate the problem, increase the risk to the pupil or if there are any other extenuating circumstances, initial advice will be sought from Children's Services prior to notifying the parents. This may result in an immediate referral to Children's Services without parents being notified.
g) If there is an allegation which involves a member of staff, parents will only be informed after the school has consulted with the LADO and has obtained the LADO's consent.
h) If a parent has any safeguarding concerns he/she should contact the school's DSL as soon as possible.

19. AWARENESS OF MENTAL HEALTH IN CHILDREN

Schools have an important role to play in supporting the mental health and wellbeing of pupils. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Mental health problems can also, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and a report made to the DSL as outlined above.

A broad variety of activities are designed for full boarders in the evenings and on weekends to ensure that they have time to unwind from academic time and ensure that their mental health is looked after, such as external trips, internal visitors, craft and sport options.

Early intervention to identify issues and provide effective support is crucial. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention**: the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- **Identification:** recognising emerging issues as early and accurately as possible
- **Early support:** helping pupils to access early support and intervention

- **Access to specialist support**: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the school suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs;
2. a plan to set out how the pupil will be supported;
3. action to provide that support
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disasters or terrorist attacks

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and anti-social behavior
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic depressive disorder

If staff have any concerns about the mental health of a child they should report this to the DSL immediately following the procedures outlined in this policy.

More information can be found in the *DfE 'Mental Health and Behaviour in Schools'* guidance

20. SUPPORT FOR PUPILS

Cottesmore School recognises that children who are abused or witness domestic abuse may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. School may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn.

We will endeavour to support the pupil through:

- The content of the curriculum.
- The school ethos, which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The school behaviour policy, which is aimed at supporting all pupils, including vulnerable pupils, in the school. The school will aim to ensure that the pupil knows that some behaviour is unacceptable but they are valued and will be supported.
- Liaison with other agencies that support the pupil such as social services, Child and Adolescent Mental Health Service, education welfare service and educational psychology service.
- Ensuring that, when any pupil leaves the school, all safeguarding information is transferred to the new school immediately, separately from their main school file and confirmation of receipt obtained.
- Ensuring that all staff have access to the school's safeguarding policies and procedures.

21. HOW PUPILS CAN VOICE ANY CONCERNS

At the beginning of term, Form Tutors should ensure that their class understand that if they have any problems or complaints they should feel able to tell one of the following:

- Form Tutor
- Teaching Assistant
- Subject teacher
- Set Master
- School Nurse
- Matron
- Head of Boarding/ Houseparent
- Deputy Head
- Head
- Any other member of staff
- Designated Person within the EYFS
- Independent Listener

The children should feel assured that the staff will listen sympathetically and non-judgmentally.

- If they do not feel able to talk to a member of staff they may see the School Doctor at surgery time and there is an option of seeing a female Doctor if required.
- There is a Happiness Box as a channel of communication between pupils and staff on all personal issues.
- Pupils have access to the telephone and to Childline. The number for Childline is posted by the telephones.
- They have contact details (phone and email) of Ruth Calvert, our Independent Listener on the Happiness Charter, that is displayed in every room in school, as well as by the phones that pupils use.
- The Happiness Charter is prominent around the school both in classrooms and in the boarding areas to help the children. All children, including boarders, are able to call the Independent Listener using the school telephones. The number for the Office of the Children's Commissioner, Dame Rachel de Souza, 08448009113, is also on this document. The children can also call Ofsted on 03001231231.
- They have contact details (phone and email) of Ruth Calvert, our Independent Person on the Happiness Charter.

22. SUPPORT FOR STAFF

The school recognises that staff who have become involved with a pupil who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. The school will support such staff by providing an opportunity to talk through their anxieties with the DSL and will seek further support as appropriate.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school. Staff can call 0800 028 0285 or email help@nspcc.org.

23. ALLEGATIONS AGAINST A MEMBER OF STAFF

As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the school (including self-employed staff, supply teachers, volunteers and contractors).

All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner at all times, both to ensure the safety of the pupils, and to reduce the risk of any allegation of improper behaviour.

If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, the school will follow the guidance in Part 4 of KCSIE and the procedures of West Sussex SCP.

There are two levels of allegation/concern:
1. Allegations that may meet the harms threshold

2. Allegation/concerns that do not meet the harms threshold – known as 'low level concerns'.

23.1. Allegations that meet the harms threshold

Allegations that might indicate that a person is unsuitable to work with children are where a person has:

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

The following procedures relate to all members of all staff, (including the self-employed, supply staff and contractors) governors and volunteers or any other adults who are currently working in the school, regardless of whether the school is where the abuse is alleged to have taken place and regardless of whether it involves pupils at this school.

At Cottesmore we believe that it is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with fairly, quickly, and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation.

23.2 Reporting an allegation or concern

Staff must never think that abuse by an adult is not possible in this school, or immediately disbelieve an accusation against someone who is known well and trusted.

Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who makes a report verbally in the first instance will also be required to make a written record of the information they have disclosed. If there is a situation where there is a conflict of interest in reporting the matter to the Head or Proprietor, this should be reported directly to the LADO.

Any allegations about a member of staff or another adult, in the Prep School, Pre-prep School and EYFS, as listed below must be reported immediately to the Headmaster (or to the Proprietor in the absence of the Headmaster) who will contact the LADO for advice for West Sussex for advice.

If the allegation concerns the Headmaster, the person receiving the allegation will immediately inform the Local Authority Designated Officer (LADO) without notifying the Headmaster or the Proprietor.

If the allegation concerns the Proprietor the concern should be taken directly to the local authority Designated Officer (LADO).

23.3 Procedures & Informing the Local Authority Designated Officer (LADO)

If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police will be made immediately.

An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO of West Sussex who will advise on the next steps to be taken.

Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.

There are two aspects to consider when an allegation is made:-

- Look after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
- Investigate and support the person subject to the allegation - the case manager (usually the head, unless the head is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The school's aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.

The Headmaster will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation.

The Headmaster will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.

Any allegation against staff, including those considered borderline, must be reported and discussed with the LADO without delay, and within one working day.

An initial assessment of any allegation referred will be made by the LADO and the Headmaster. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the school's usual staff disciplinary procedures.

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and
- agree on what information should be put in writing to the individual concerned and by whom.

Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the Headmaster. If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.

In the case of a referral and investigation, the Headmaster must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.

Where there are no objections from the investigating agencies, the Headmaster will:

- inform the person making the allegation and explain the likely course of action
- ensure the parents of the pupil(s) who is the alleged victim have been informed about the allegation and the likely course of action
- inform the member of staff against whom the allegation is made and explain the likely course of action
- keep a written record of the above.

The Headmaster, in consultation with the LADO, will make the decision whether or not to suspend the teacher involved.

If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. The Education Act (2011) prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.

The Headmaster will take advice from the LADO and other agencies to agree:

- Who needs to know and exactly what information can/cannot be shared
- How to manage speculation and gossip
- What, if any, information can be given to the wider community to reduce speculation
- If necessary, how to manage the press.

The school has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.

The following definitions will 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.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.

Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

Allegations relating to supply teachers/employees of third party

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, staff provided by an employment agency or business. The school will usually take the lead but agencies/ third party employers will be notified and should co-operate in any enquiries from the LADO, police and/or Children's Services.

In no circumstances will the school decide to cease to use a member of staff due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The school will discuss with the agency whether it is appropriate to suspend the person while an investigation is carried out but this decision rests with the Head and the LADO.

23.4 Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

If the school ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

For teaching staff, the school also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in *Teacher misconduct: the prohibition of teachers* (October 2015). Further guidance is published on the TRA website.

23.5 Non-recent allegations

Abuse can be reported no matter how long ago it happened.

Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police.

Non-recent allegations made by a child, will be reported to the LADO in line with West Sussex procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

The school's arrangements for whistle-blowing can be found on the school's website under Confidential Reporting Policy.

24. LOW LEVEL CONCERNS

Definition of a low-level concern

The term 'low-level' concern does not mean that it is insignificant.

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 school's Staff Behaviour and Code of Conduct, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO 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 their mobile phone;
- 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.

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

It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the school's Staff Behaviour and Code of Conduct), are shared responsibly and with the right person, and recorded 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.

24.1 Reporting low-level concerns

Where a low-level concern has been identified, this must be reported as soon as possible to the headmaster. However, it is never too late to share a low-level concern if this has not already happened.

Where the headmaster is not available, the information should be reported to the DSL (or deputy), i.e. the most senior member of SMT acting in this role.

Low-level concerns about the Designated Safeguarding Lead should be reported to the headmaster and those about the headmaster should be reported to the Chair of the Governance Advisors.

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

24.2 Recording concerns

A written summary of the low-level concern should be made and signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the headmaster a record of the conversation will be made by the headmaster which will be signed by both parties, timed, and dated.

All staff may ask to see content that relates to them and to make any reasonable objection to its contents.

24.3 Responding to low-level concerns

Where a low-level concern has been raised, this will be taken seriously and dealt with promptly. The headmaster 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 (HR advice via the Bursar may also need to be taken)

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required
- 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. via the Disciplinary Procedure.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken via the Head of Finance and Operations.

Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:

- 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 HR advice taken from the Bursar. In this case, the school's Staff Behaviour and Code of Contact within the Child Protection and Safeguarding Policy and Disciplinary Policy will be followed

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

24.4. Anonymity

The person bringing forward the concern will be named in the written record. 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.

24.5 Self-reporting

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 Staff Behaviour and Code of Conduct. In these circumstances, they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

24.6 Review

The records 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.

24.7 References

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.

24.8 Role of the Governance Advisors

The headmaster will regularly inform the Governance Advisors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant

data. The safeguarding governance advisor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

25. RESTRICTIVE INTERVENTION (RESTRAINT & SECLUSION)

On the use of restricted interventions which include the use of force to restrain, the use of seclusion and non-force related restraint the school will record and report incidents as per the guidance 'Restrictive Interventions including use of reasonable force in Schools' published in April 2026.
https://assets.publishing.service.gov.uk/media/6943dad6501cdd438f4cf5aa/Restrictive_interventions_including_use_of_reasonable_force_in_schools.pdf

School will also have additional consideration for SEND pupils and protected characteristics.

Please refer to the Promoting Good Behaviour and Sanction Policy for further information.

26. EYFS MOBILE PHONE/CAMERA POLICY

The Statutory Framework for the Early Years Foundation Stage (2021) requires schools to have a safeguarding policy and procedure which includes the school's policy on the use of mobile phones, cameras and other devices in the school to minimise the risk of inappropriate sharing of images. We place restrictions on the use of mobile phones and cameras within the EYFS setting as stated in our Mobile Phone and Camera Policy. The Mobile Phone and Camera Policy also covers the whole school.

27. SAFER RECRUITMENT OF STAFF
The school follows statutory guidance for the safer recruitment of staff and volunteers as set out in Part Three of KCSIE and *Disqualification under the Childcare Act 2006* (September 2018)

Further information on recruitment may be found in Cottesmore's Safer Recruitment Policy, the Safer Recruitment Quick Reference Tick List and the Safer Recruitment Pending DBS Check Policy and Risk Assessment in the Pastoral Care section of the School website.

28. STAFF TRAINING

28.1 Induction Cottesmore runs its own thorough induction programme for all staff and volunteers newly appointed to the school.

The purpose of induction is to:

- provide training and information about the establishment's policies and procedures
- support individuals in a way that is appropriate for the role for which they have been engaged
- confirm the conduct expected of staff within the school - Staff Code of Conduct is available in the Staff Handbook
- provide opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibilities

- enable the person's line manager or mentor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately

The content and nature of the induction process will vary according to the role and previous experience of the new member of staff or volunteer

The DSL is responsible for ensuring that all new members of staff working in school, and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training will take place prior to the new member of staff starting work with the children.

All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:

- Keeping Children Safe in Education, Part 1
- Safeguarding Policy
- Staff Code of Conduct
- Use of Technology Policy
- Confidential Reporting Policy
- Behaviour Policy
- Anti-bullying Policy
- Prevent training
- Procedures on managing children who go missing from education
- How to report concerns to the DSL

The school takes a risk based approach to the level of information provided when training other temporary staff, staff running clubs, contractors and volunteers.

28.2 Staff Training

a) All staff are required to read, at least annually, the Safeguarding Policy (i.e. this policy) and the Staff Code of Conduct and must confirm that they have done so.
b) All staff are required to read and understand the current guidance for staff in Part 1 and Annex B of KCSIE and confirm that they have done so.
c) Every member of staff receives comprehensive training in safeguarding (including on-line safety) at least every three years, in line with advice from West Sussex SCP.
d) Refresher training is provided annually at the start of the academic year and on specific issues through the year as required.
e) All staff are trained in how to listen, respond to and report any disclosures including those which involve child on child sexual violence or sexual harassment.

28.3 DSL Training

The DSL and Deputy DSLs undergo training at a minimum every two years, which includes training in inter-agency working in line with Annex B of KCSIE. They have updates, at least annually, on specific issues as required.

28.4 Training for the Proprietor

The Proprietor has received specific safeguarding training. She undertakes refresher training every two years, as a minimum. This training is to ensure that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole-school approach to safeguarding.

29. Statutory Guidance and other documents informing the policy

This policy pays due regard to the following statutory guidance and other government advice. It also complies with the procedures of West Sussex SCP.

1. *Keeping Children Safe in Education (September 2026)*
2. *Working Together to Safeguard Children (WT) (2018 updated 2022)*
3. *Independent School Standards Regulations (2014)*
4. *HM Gov advice 'What to do if you're worried a child is being abused' (March 2015)*
5. *Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings' (April 2020)*
6. *DfE guidance 'Teaching online safety in school' (June 2019)*
7. *Promoting and supporting mental health and wellbeing in schools and colleges (2022)*
8. *When to call the police, non-statutory guidance from the National Police Chiefs' Council*
9. *DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)*
10. *DfE Statutory Guidance "Relationships Education, Relationships and Sex Education (RSE) and Health Education" (2019 updated 2021)*
11. *Designated teacher for looked after children (February 2018)*
12. *Statutory Framework for the Early Years Foundation Stage (2021)*
13. *DfE statutory guidance 'Children missing education' (September 2016)*
14. *Disqualification under the Childcare Act 2006 (September 2018)*
15. *Counselling in schools: a blueprint for the future (February 2016)*
16. *Prevent Duty Guidance for England and Wales (originally issued March 2015 revised July 2015)*
    supplemented by non-statutory advice: The Prevent duty: Departmental advice for schools and childcare providers (June 2015) and a briefing note for schools about the use of social media for on-line radicalisation (July 2015)
17. *The use of social media for on-line radicalisation (July 2015)*
18. *Equality Act 2010: advice for schools (updated 2018)*

19. *Promoting the education of children with a social worker: Virtual School Head role extension (June 2022)*
20. *Police and Criminal Evidence Act (PACE) Code C 2019*
21. *Meeting digital and technology standards in schools and colleges (DfE March 2022)*
22. *DfE Searching Screening and Confiscation Advice for schools (September 2022)*
23. *DfE Sharing nudes and semi-nudes: how to respond to an incident. (December 2020)*

APPENDIX 1

CATEGORIES OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

Further information is also available in KCSIE Part 1 and Annex B

1. Definition

KCSIE defines abuse as:

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

Paragraph 24 KCSIE (2025)

The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked. Any concerns, whether they are listed below or not, should be brought to the attention of the DSL immediately.

The main categories of abuse outlined in KCSIE, are

(a) Physical abuse
(b) Emotional abuse (including domestic abuse)
(c) Sexual abuse
(d) Neglect

2. Risk factors

In an abusive relationship the child may

(a) appear frightened or wary of the parent/s or other adult
(b) act in a way that is inappropriate to her/his age and development

The parent or carer may

(a) persistently avoid child health promotion services and treatment of the child's episodic illnesses
(b) have unrealistic expectations of the child
(c) frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
(d) be absent or misusing substances
(e) persistently refuse to allow access on home visits
(f) be involved in domestic abuse

3. Recognising signs of physical abuse

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

The following are often regarded as indicators of concern:

(a) an explanation which is inconsistent with an injury
(b) several different explanations provided for an injury
(c) unexplained delay in seeking treatment
(d) the parents/carers are uninterested or undisturbed by an accident or injury
(e) parents are absent without good reason when their child is presented for treatment
(f) repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
(g) family use of different doctors and A&E departments
(h) reluctance to give information or mention previous injuries
(i) two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
(j) repeated or multiple bruising on the Head or on parts of the body unlikely to be injured accidentally
(k) variation in colour, possibly indicating injuries caused at different times
(l) the outline of an object used, e.g. marks from a belt or a hair brush, or of a hand print
(m) bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
(n) bruising around the face
(o) grasp marks on small children
(p) bruising on the arms, buttocks and thighs may be an indicator of sexual abuse
(q) bite marks
(r) circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)

(s) scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks)
(t) scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath
(u) medical attention is sought after a period of delay when a fracture has caused symptoms such as swelling, pain or loss of movement.

4. Recognising signs of emotional abuse

Another form of abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that he or she is worthless or unloved, inadequate, or valued only insofar as meeting the needs of another person. It may include not giving the child opportunities to express his or her views, deliberately silencing the child or 'making fun' of what he or she says or how the child communicates. It may feature age or developmentally inappropriate expectations being imposed on the children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, including domestic violence. It may involve serious bullying (including cyberbullying), causing the child frequently to feel frightened or in danger, or the exploitation or corruption of the child. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse may also indicate the presence of other forms of abuse.

The following may be indicators of emotional abuse:

(a) developmental delay
(b) abnormal attachment between a child and parent/carer, e.g., excessive anxiety on the part of either
(c) indiscriminate attachment or failure to attach
(d) aggressive behaviour towards others
(e) scape-goated within the family
(f) frozen watchfulness, particularly in pre-school children
(g) low self-esteem and lack of confidence
(h) withdrawn or seen as a "loner" – difficulty relating to others
(i) reverting to younger behaviour
(j) depression, withdrawal
(k) fear of academic failure or 'getting things wrong'.

For further information on bullying, including cyber bullying, please see the school's Anti-bullying Policy.

5. Recognising signs of sexual abuse

Sexual abuse (KCSIE, paragraph 27) 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 the 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 can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school's policy and procedures for dealing with it.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are

(a) inappropriate sexualised conduct
(b) sexually explicit behaviour, play or conversation, inappropriate to the pupil's age
(c) continual and inappropriate or excessive masturbation
(d) self-harm (including eating disorders), self-mutilation and suicide attempts
(e) involvement in prostitution or indiscriminate choice of sexual partners
(f) an anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are

(a) pain or itching of genital area
(b) blood on underclothes
(c) pregnancy in a younger girl where the identity of the father is not disclosed
(d) physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Staff should also be aware of the possibility of sexual exploitation.

6. Signs of neglect

Neglect may be defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to

(a) provide adequate food, clothing and shelter (including exclusion from home or abandonment)
(b) protect a child from physical and emotional harm or danger
(c) ensure adequate supervision (including the use of inadequate care-givers)
(d) ensure access to appropriate medical care or treatment.
(e) be responsive to a child's basic emotional needs.

The following may be indicative of neglect of a child:

(a) the child is dirty, smelly, poorly clothed or appears underfed
(b) the child has lingering illnesses which are not attended to
(c) there is a marked deterioration in school work
(d) the child exhibits significant changes in behaviour, aggressive behaviour, severe tantrums
(e) an air of 'detachment' or a 'don't care' attitude
(f) overly compliant behaviour
(g) a child who is reluctant to go home or is kept away from school for no apparent reason
(h) 'tummy pains' with no medical reason
(i) running away from home, suicide attempts
(j) extreme anger, sadness or depression
(k) child left with adults who are intoxicated or violent
(l) child left alone for excessive periods
(m) child thrives away from home environment.

7. Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents. Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing. This can lead to increased risks with children who may spend long periods online or at an older age

have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

8. Child abduction and community safety incidents

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

9. Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

10. Children Missing Education & Children Absent from Education

Children Absent from Education: Knowing where children are during school hours is an extremely important aspect of safeguarding. Children who are absent from school, particularly persistently, can be an early warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines.

The school monitors attendance carefully and addresses poor or irregular attendance without delay. The school will always follow up with parents/carers when pupils are absent and maintains at least two up to date contacts numbers for parents/carers.

The school will inform the local authority of any pupil who fails to attend school regularly or who has been absent without the school's permission for a continuous period of ten days or more.

Children Missing Education: The school follows procedures to inform the local authority when taking pupils off-roll if they:

1. leave school to be home educated
2. move away from the school's location
3. remain medically unfit beyond compulsory school age

4. are in custody for four months or more (and will not return to school afterwards); or
5. are permanently excluded

In addition the school ensures that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

The local authority is also informed of any child whose name is added to or deleted from the admission register at a non-standard transition point, in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

If a pupil leaves the school then, whether there are any concerns about that pupil or not, the school will seek to obtain, for inclusion in the return the name of the future school, the expected date of the child's first day there, and, if applicable, the family's new home address and the date on which the family will be moving to it. If there are concerns about a pupil and a parent refuses to supply the information this may also result in a report to Children's Services.

When a pupil moves to another school, the DSL must inform the receiving school without delay that child protection records exist. Within 5 days the original records must be passed on either by hand or sent by Royal Mail Special Delivery Guaranteed or Royal Mail Signed For post and a receipt obtained at the post office at which the letter with the records is handed in.

11. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when the sexual activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The school is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

- Inappropriate relationships:

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

- Boyfriend:

Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

- Organised exploitation and trafficking:

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

Indicators of child sexual exploitation may include:

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

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

12. Child Criminal Exploitation (CCE) including gangs and County Lines

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- going missing for periods of time or regularly coming home late;

- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

If there are any concerns a child or young person is at risk of Criminal exploitation West Sussex IFD must be contacted for advice.

13. Domestic abuse

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

Both men and women can be abused or abusers.

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 serious, long lasting emotional and psychological impact on children. The school should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Teenagers can also suffer domestic abuse in their own relationships.

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

Indicators that a child is living within a relationship with domestic abuse may include:

• being withdrawn

• suddenly behaving differently

• anxiety

• being clingy

• depression

• aggression

• problems sleeping

- eating disorders
- bed wetting
- soiling clothes
- excessive risk taking
- missing school
- changes in eating habits
- obsessive behaviour
- experiencing nightmares
- taking drugs
- use of alcohol
- self-harm
- thoughts about suicide.

These behaviours themselves do not indicate that a child is living with domestic abuse but should be considered as indicators that this may be the case. If staff believe that a child is living with domestic abuse, this must be reported to the DSL for referral, to be considered by children's social care.

14. Parental misuse of drugs or alcohol

Parental misuse of drugs or alcohol becomes relevant to child protection as parenting capacity is likely to be impaired or undue caring responsibilities fall on a child in the family.

For children, the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour
- Bullying (including due to poor physical appearance)
- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration
- Child talking of or bringing into school drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role

• Continued poor academic performance including difficulties completing homework on time

• Poor attendance or late arrival.

These behaviours themselves do not indicate that a child's parent is misusing substances but should be considered as indicators that this may be the case. If staff believe that a child is living with parental substance misuse, this must be reported to the DSL.

15. Operation Encompass

When police are called to an incident of domestic abuse and there is a child(ren) in the household the police will usually inform the DSL in school before the child(ren) arrives at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable appropriate support to be given.

16. So called 'honour based' abuse

HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code this includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

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.

17. Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK. A pupil may have difficulty walking, sitting or standing. A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating. There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.

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

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHCE
- visiting female elder from the country of origin

- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Female Genital Mutilation particularly affects girls from families with a North African heritage, including Egypt, Sudan, Somalia, Sierra Leone, Mali and also Indonesia and Malaysia. The boarding team are particularly vigilant if girls are from countries where the incidence of FGM is high.

This procedure often takes place in the summer, as the recovery period after FGM can be 6 to 9 weeks. Schools should be alert to the possibility of FGM as a reason why a girl in a high risk group is absent from school or where the family request an 'authorised absence' for just before or just after the summer school holidays.

Although, it is difficult to identify girls before FGM takes place, where girls from these high risk groups return from a long period of absence with symptoms of FGM, advice should be sought from the police or social services.

Information will usually come from a disclosure. Under no circumstances should school staff physically examine pupils.

18. Mandatory Reporting of FGM

If there is concern about FGM from discussion with children or noticeable changes in behaviour, the appropriate reporting must take place immediately (within 24 hours).

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

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101. The duty to report should not be transferred to the DSL, however the DSL must be informed. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including by dialling 999 if appropriate.

19. Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is not the same as an arranged marriage which is common in many cultures. Forcing a person into a marriage is a crime in England and Wales.

20. Child-on-child abuse (also see Anti-bullying policy, Behaviour Policy, RSE Policy)

It should be noted that a child is anyone under the age of 18.

Children are also vulnerable to abuse by other children and staff should be aware that safeguarding issues can manifest themselves via child on child abuse. The school acknowledges that within boarding there is potential for abuse by other children. During boarding hours, supervision and guidance from the adult boarding team is always in place to avoid incidences of child-on-child abuse.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence and sexual harassment (see Part five of KCSIE)
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- initiation/hazing type violence and rituals

The school has a zero-tolerance approach to such abuse and it will never be tolerated or passed off as "banter", “just having a laugh” or "part of growing up". Staff will always challenge such behaviours. Different gender issues can be prevalent when dealing with child on child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

Any child can be vulnerable to child-on-child abuse and staff should be alert to signs of such abuse amongst all children. However, individual and situational factors can increase a child's vulnerability to abuse. For example, children who are more likely to follow others and/or who are socially isolated from may be more vulnerable, as may pupils with SEND or certain medical conditions.

Children who are LGBT can also be targeted. In some cases, a pupil who is perceived to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share any concerns with members of staff.

All children involved whether victim or perpetrator will be treated as “at risk” and supported. The school recognises the gendered nature of child-on-child abuse and that it is more likely that girls will be victims and that boys will be perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Staff are made aware that child-on-child abuse may happen inside or outside school or online and that that even if there are no reports in the school it does not mean child-on-child abuse is not happening, it may be the case that it is just not being reported. A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the reporting procedures outlined above.

Through safeguarding training and anti-bullying training, staff will be made aware of the harm caused by child-on-child abuse and will follow the school's Behaviour Policy, Anti-bullying Policy and safeguarding procedures as appropriate. It may be appropriate to regard a young person's behaviour as abusive if:

- there is a large difference in power (for example age, size, ability, development) between the young people concerned;
- the perpetrator has repeatedly tried to harm one or more other children;
- there are concerns about the intention of the alleged perpetrator;
- there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'

The DSL will not undertake any enquiry or investigation where a case is referred to Children's Services or the police. The initial assessment of any allegation will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved, whether the allegation is demonstrably false or whether there has been inappropriate behaviour that can be dealt with through the school's usual disciplinary procedures The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the pupil making the allegation and explain the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will ensure the parents of the pupil who is the alleged perpetrator are informed about the allegation and the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The necessary support and any required sanctions following child-on-child abuse will be determined on a case by case basis.

The Head will make the decision whether or not to suspend or exclude the pupil(s) involved.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case by case basis depending on the circumstances.

If pupils are found to have made malicious allegations, appropriate sanctions will be applied, which could include temporary or permanent exclusion.

21. Strategies to reduce the risk of child-on-child abuse

Preventative strategies for child-on-child abuse are regularly considered and the school has an ethos where pupils feel safe to share information about anything that is upsetting them and any derogatory language or behaviour is always challenged by staff.

Cottesmore also looks to take a proactive, preventive and educative approach to safeguarding issues with its staff and pupils. Opportunities are sought to give teaching and learning opportunities to our pupils, within the context of PSHE. The possible avenues for such education to take place, including education about abusive behaviour, include the following:

- Chapel Line Up
- Evening and weekend Line Up (boarders)
- Wellbeing sessions with Form teachers
- Safeguarding Council meetings
- Engagement between pupils and the wider pastoral team, including Medical Centre staff, Chaplains, Counselling Team etc.
- Pastoral tutor group sessions led by Pastoral Tutors
- Year group PSHE presentations from external speakers
- LGBTQ+ Discussion Forum/ lessons in PSHE curriculum

Lessons are given in an emotionally safe environment; ground rules of confidentiality are set given and any vulnerable pupils identified. Lessons include what abuse is; who to tell; what to say; what to do; what not to do and where to get support from within and outside of the school; issues of consent, sexual violence and harassment. Cottesmore recognises the challenge that young people face in talking about such issues and so learning opportunities aim to develop confidence in our pupils so that they feel they can communicate about safeguarding issues, including asking questions and disclosing concerns. Cottesmore believes that other underpinning preventive learning about issues, such as consent, healthy relationships, online safety, recognising abusive and coercive behaviour, covered in the avenues outlined above, may help to support learning about abuse.

22. Prejudiced Behaviour

Pupils may also display hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected

with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

22. Child on child abuse which involves sexual violence and sexual harassment

a) Cottesmore recognises that sexual violence and sexual harassment occurring online (either in isolation or in connection to offline incidents) can introduce a number of complex factors. These include the potential for the incident to take place across a number of social media platforms and services, and for things to move from platform to platform online. It also includes the potential for the impact of the incident to extend further than Cottesmore's local community (e.g. for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated.
b) The school has a zero-tolerance approach to any form sexual violence and sexual harassment; it is never acceptable and will not be tolerated.
c) Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between young people. It can also occur online.
d) It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
e) A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.
f) Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.
g) A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.
h) When responding to a report of sexual violence the DSL will decide on the response following the advice in Part 5 of KCSIE. This will include
    - Initial response - considering the needs of both victim(s) and alleged perpetrator(s).
    - Record Keeping
    - Risk Assessment
    - Consideration of most appropriate response: internal management, early help, referral to
    - Children's Social Care and/or referral to the Police.
    - Ongoing response – safeguarding and support for all parties

i) The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police. The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.

j) The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

k) If a pupil against whom an allegation of abuse has been made is required to be interviewed by the police, then the pupil will be supported during the interview by an appropriate adult.

l) For incidents that involve young people not at Cottesmore, the DSL, with advice from any other agencies involved, will decide if there is a need to contact another school, college, setting or individual.

m) The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

n) The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

o) Any sanctions required following a report of child-on-child abuse will be determined on a case by case basis.

p) A pupil against whom an allegation of abuse has been made such that there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' may be suspended from the School during the investigation in accordance with the School's Behaviour Management and Bullying policies. In the case of a pupil whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation.

q) Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case by case basis depending on the circumstances.

r) Cottesmore is aware that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. Cottesmore will work with professionals as required to understand why a child may have abused another child. Cottesmore believes that, as a child, any alleged perpetrator is entitled to, deserving of, and should be provided with, a high level of support to help them understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again.

23. E-safety and online behaviour

a) The school adopts a whole school approach to online safety which seeks to reduce risk as far as possible without depriving pupils of the significant benefits provided by technology and the internet.
b) Computing and PSHE lessons are used to help pupils to understand and avoid the risks associated with 'online activity'.
c) The breadth of issues classified within online safety is considerable, but can be categorised into four main 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, phishing and or financial scams

d) The school does all it reasonably can to limit the pupil's exposure to the above risks in school. It has filters and monitoring systems in place, which are designed to protect them from online abuse without imposing unreasonable restrictions and preventing pupils benefitting from the wealth of resources available online. Staff are trained to consider the efficiency of the filtering and monitoring system.
e) Pupils also receive guidance on the safe use of the internet and are educated about the risk of online harm (including anti-bullying).
f) Cyber-bullying by pupils, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through the school's anti-bullying policy procedures.
g) Social networking sites and other apps can be sources of risk of inappropriate and harmful behaviour. This includes the risks related to harmful online challenges and hoaxes.
h) If staff suspect that a pupil may be at risk of or suffering from online harm, they should follow the reporting procedures set out in this policy.

24. Youth produced sexual imagery, nudes/semi-nudes, sexting, upskirting

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute inappropriate imagery (nudes, semi-nudes, sexting) in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

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

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view images, delete images or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

Parents will be informed at an early stage of inappropriate online behaviour, unless there is reason to believe that involving parents would put the pupil at risk of harm.

If there is concern a young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

25. Sexual behaviour by children

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following 'traffic light' approach:

Green behaviours reflect safe and healthy sexual development. They are:

i. Displayed between children or young people of similar age or developmental ability
ii. Reflective of natural curiosity, experimentation, consensual activities and positive choices

Amber behaviours have the potential to be outside safe and healthy development. They may be:

i. Unusual for that particular child or young person

ii. Of potential concern due to age or developmental differences
iii. Of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

Red behaviours are outside safe and healthy behaviour. They may be:

i. Excessive, secretive, compulsive, coercive, degrading or threatening
ii. Involving significant age, developmental or power differences
iii. Of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for referral to Children's Services.

26. Fundamental British values and the Prevent Duty

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This is known as the 'Prevent Duty'. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach. At Cottesmore School staff are trained to identify children at risk of radicalisation and extremism.

The School complies with the Independent School Standards Regulations, which include an explicit requirement to promote fundamental British values as part of broader requirements relating to the quality of education and to promoting the spiritual, moral, social and cultural development of pupils.

The School supports pupils to build resilience to the risk of radicalisation through the PSHE programme (SMSC), promoting British Values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs within our curriculum and through the day to day ethos of the school, and visual displays.

Advice and support is available with regards to extremism and radicalisation from the West Sussex Safeguarding Children Partnership. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. We ensure a safe environment for our pupils, in which children can understand and discuss sensitive topics, including terrorism and the extremism, amongst other discussion relevant to the children. We are, however, mindful of our existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

In any concern raised, Cottesmore School will consider the level of risk to identify the most appropriate referral, which could include Channel or Children's Social Care.

Policies set out clear protocols for ensuring that any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised. We ensure that

our safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Partnership.

Should any concern be raised about radicalisation at Cottesmore School, we refer to the Prevent strategy information page on the West Sussex SCP website initially and then make a Channel Referral in West Sussex through using the Prevent Channel Referral Form. The LADO (Local Authority Designated Officer) can be contacted for additional advice. The DSL will act on behalf of any member of staff who is concerned or will support them in their referral. Records are kept up to date and concerns are followed up until resolution

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

27. Recognising Extremism

Early indicators of radicalisation or extremism may include:

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

Cottesmore school's IT policies and filtering and monitoring systems ensure that children are safe from terrorist and extremist material when accessing the internet in school. Throughout the school, including in the EYFS, the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs are promoted through a fair and balanced curriculum with expectations of mutual respect of all backgrounds. Fundamental British values are also encouraged throughout the school through clear guidance of behaviour expectations for the pupils and staff, being respectful of each and every person's views and feelings, through the Happiness Charter, through PSCHE lessons and through the School Council.

28. Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment.

29**. Private Fostering**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

30. Fabricated Illness

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history;
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid
- Induction of illness by a variety of means

Further information may be found at https://www.londoncp.co.uk/fab_ind_ill.html

31. Contextual Safeguarding

Contextual safeguarding is an approach that recognises that safeguarding risks can arise within peer groups, boarding environments and online contexts. The school therefore assesses and manages environmental factors alongside individual pupil concerns.

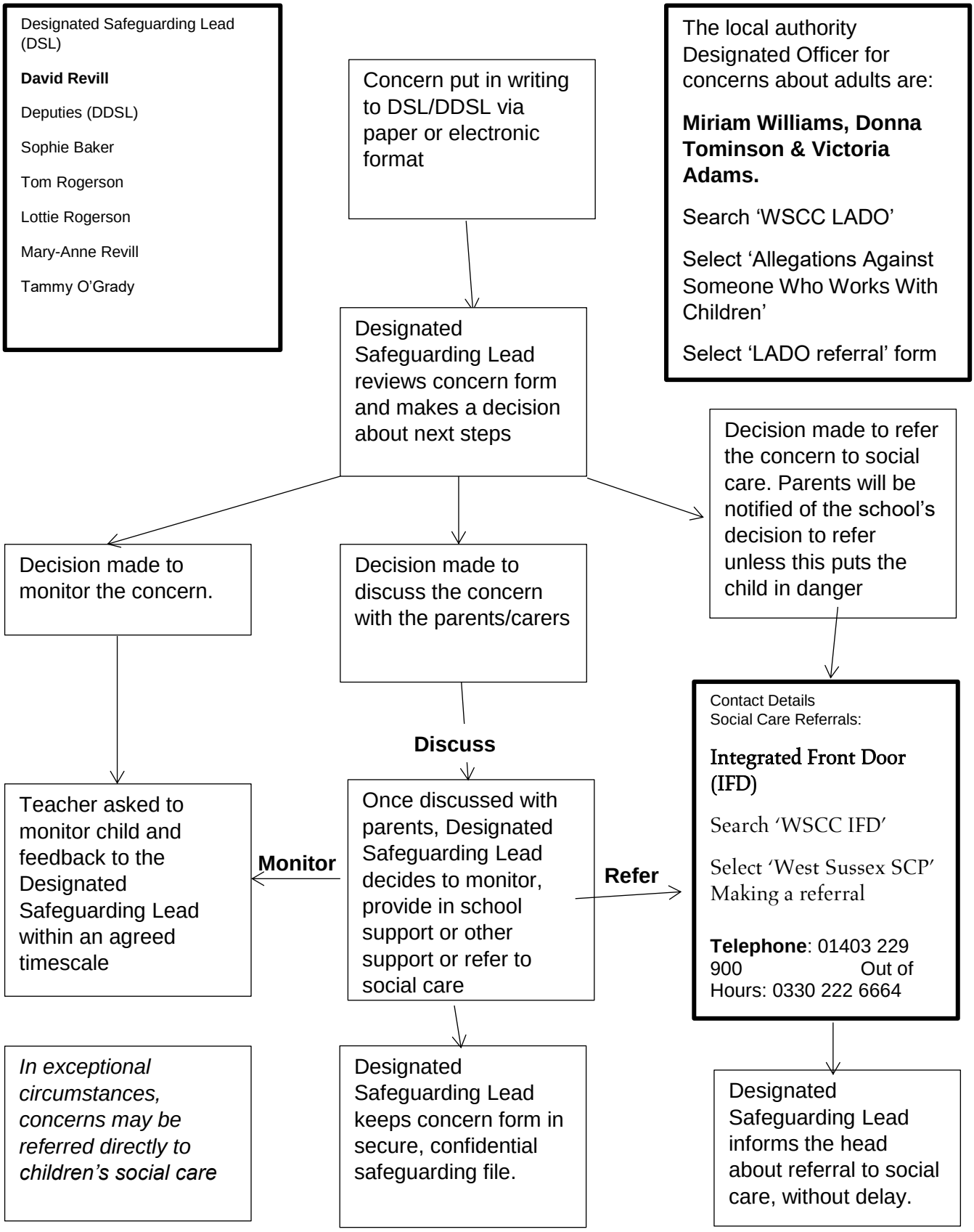
We consider the following contexts for pupils at Cottesmore School:

- Who children mix with (peers, different ages, friendship groups)
- Where they spend time (dorms, off-site trips, in addition to the general school areas)
- What they access online (gaming sites/apps and group chats outside of school)
- How peer dynamics affect behaviour and risk

COTTESMORE SCHOOL

Appendix 2

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



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