

**BROCKWOOD PARK SCHOOL & INWOODS SMALL SCHOOL  
including EYFS (Early Years' Foundation Stage)  
SAFEGUARDING AND CHILD PROTECTION POLICY**

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Policy is maintained by	DSL and DDSLs
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## 1 Introduction

Safeguarding and child protection is at the centre of everything we do both at Brockwood Park School and Inwoods Small School. As a school that at its core offers a holistic approach to education, we place healthy and supportive relationships as a priority.

We are clear that at both schools, safeguarding and promoting the welfare of children is everyone's responsibility. It is important for children to receive the right help at the right time and be able to address safeguarding risks, prevent issues from escalating and promote children's welfare. At Brockwood and at Inwoods there is a zero-tolerance approach to abuse of any kind and even if there are no reported cases, staff must take the view that it can happen in these settings. At both schools we make sure that systems are in place for children to express their views, we operate with the best interests of the child at their heart. All staff are aware that children may not be ready or know how to tell someone that they are being abused, but the close and careful monitoring of each child, in both schools, encourages a trusting environment where disclosures do happen.

Brockwood Park School is run by a management committee, currently consisting of the following four members: Kate Power, Mina Masoumian, Thomas Lehmann and Tom Power. The *School Management Committee* (SMC) is overseen and coordinated by two *Co-Chairs*: Mina Masoumian and Thomas Lehmann. The SMC fulfils the role of a Principal/Headteacher in the school. From the safeguarding perspective and for any reference made to Principal/Headteacher in the standards and *KCSIE (Keeping Children Safe in Education)*, this role is fulfilled by the Co-Chairs. One of the Co-Chairs is the DSL.

The board of Trustees have a strategic leadership responsibility for the school's safeguarding arrangements and ensure that they comply with their duties under legislation. Their objective is to facilitate a whole school approach to safeguarding which involves everyone in the school and to ensure that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development. They aim to produce a culture that is one of safety, equality and protection for the whole school. The Co-Chairs ensure that the policies and procedures, approved by the Trustees, are understood, and followed by all staff and volunteers. The Trustees have appointed Wendy Smith, who is also the *Chair of Trustees*, and Gary Primrose as *Safeguarding Liaison Trustees for Child Protection issues*. The Chair of Trustees is responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Co-Chairs.

The Trustees undertake a full annual review of the policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. The two Liaison Trustees take a lead in this review and ensure that it is formally documented in writing and any deficiencies or weaknesses recognised in arrangements or procedures are remedied immediately and without delay. The main tool used by the Trustees for this review is reviewing the annual audit performed by the safeguarding team at the school using the Hampshire safeguarding audit tool.

This policy applies to the whole school, including the *Early Years Foundation Stage* (EYFS), and it is publicly available on the school's website and on request; a copy may be obtained from the school office at Brockwood and Inwoods. This policy applies to the School Management Committee, Trustees, all staff and volunteers working in the schools.

All employees, including senior leadership members, should read this policy in conjunction with:

- Part One and Annex B of *Keeping Children Safe in Education* (KCSIE) (September 2024)
- The *Behaviour of Students Policy* (Brockwood) or *Behaviour Management Policy* (Inwoods)
- The *Anti-Bullying Policy* (which includes measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying)
- The Staff Behaviour Policy (*Code of Conduct*)
- The *Safer Recruitment Policy*
- The [\*Teachers' Standards\*](#)

This policy is written to meet the requirements set out by the Government's statutory guidance [Working Together to Safeguard Children](#) (December 2023), [Keeping Children Safe in Education \(2024\)](#) and the [Prevent duty guidance: for England and Wales \(accessible\)](#). It also complies with The Human Rights Act 1998 (HRA), the Equality Act 2010, and the Public Sector Equality Duty. [Use of Social Media for online radicalisation \(July 2015\)](#) and [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) (2019, updated 2021). This policy is also written to address the School's charity law safeguarding duty.

## 2 Policy Aims

Our *Safeguarding and Child Protection Policy* aims to:

- To establish a safe environment in which children can learn and develop.
- To provide clear direction to staff and others about expected codes of behaviour in dealing with Safeguarding and Child Protection issues, continuing to develop awareness in all staff of the need for child protection and their responsibilities in identifying abuse, with particular care being taken with children with disabilities and SEN who are especially vulnerable. This includes online safety, understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- To ensure consistent good practice.
- To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.

- Make sure that staff are playing a vital role in preventative education, with a whole school approach that ensures a zero-tolerance approach to sexism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence and sexual harassment.
- To equip children with the skills needed to keep them safe.

### 3 Commitment to Safeguarding

At Brockwood Park School and Inwoods Small School we commit to:

- Have regard to the safeguarding procedures as outlined in the DfE (Department for Education) guidance *Keeping Children Safe in Education* (September 2024) and the latest version of the document *Working Together to Safeguard Children* (December 2023).
- Carry out the required checks of staff as outlined in the guidance *Keeping Children Safe in Education* (September 2024).
- Ensure all staff and volunteers understand their duties in being alert to signs of abuse, and the procedures for referring any concerns to the *Designated Safeguarding Lead* without delay.
- Train all new staff and volunteers in Safeguarding and Child Protection as well as e-Safety matters as soon as possible upon appointment, as part of their induction.
- Ensure that all staff know that it is an offence for a person (e.g., a teacher) over the age of 18 to have a sexual relationship with a child under 18 where that person is in a position of trust, even if the relationship is consensual.
- Develop effective links with the relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attending case conferences (at Brockwood Park School and Inwoods Small School, only the Co-Chairs can give authority for the Police to be on the school site).
- Ensure *Safer Recruitment* practices are always followed.
- Ensure that all concerns or allegations of abuse are reported to the Designated Safeguarding Lead for the schools (as named in this policy), and that policy procedures are subsequently followed.
- Keep records of concerns about children, even where there is no need to refer the matter immediately, and ensure all records are kept securely, electronically and/or in confidential paper files, separate from the main pupil file and in locked locations (this duty falls upon the Designated Safeguarding Lead).
- Provide immunity from retribution or disciplinary action against staff for ‘whistleblowing’ in good faith.
- To address the School's charity law safeguarding duty to:

- provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers.
- set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly.
- have adequate safeguarding policies, procedures and measures to protect people.
- provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as police, local authority and the Charity Commission.
- the specific statutory obligations on the School to safeguard and promote the welfare of children, as defined below.

## 4 Key people responsible for Child Protection and Safeguarding

### 4.1 Key safeguarding contacts at Brockwood Park School and Inwoods Small School

Role/Name	Contact details
<b>Safeguarding team</b>	<a href="mailto:dsl@brockwood.org.uk">dsl@brockwood.org.uk</a> <a href="mailto:dsl@inwoods.org.uk">dsl@inwoods.org.uk</a>
<b>Designated Safeguarding Lead (DSL)</b> Mina Masoumian	01962 771744 07445 691903
<b>Deputy Designated Safeguarding Lead (DDSL) - Brockwood Park School</b> Elena Maria Ciungu	01962 771744 07925 519488
<b>Deputy Designated Safeguarding Leads (DDSL) - Inwoods Small School</b> Kate Power Melanie Bacon	01962 771065 07576777543 07730348985

<b>Co-Chairs of School Management Committee</b> Thomas Lehmann Mina Masoumian	01962 771744
<b>Safeguarding Liaison Trustees</b> Wendy Smith Gary Primrose	01962 771744
<b>Chair of Governors</b> Wendy Smith	01962 771744

## 4.2 Key external contacts

Organisation	Contact details
<b>Hampshire Children Services</b>	0300 555 1384 (or 08456 035620) Out of Hours contact: 0300 555 1373 <a href="mailto:childrens.services@hants.gov.uk">childrens.services@hants.gov.uk</a>
<b>Children’s Reception Team (CRT)</b>	01329 225379 <a href="mailto:csprofessional@hants.gov.uk">csprofessional@hants.gov.uk</a>
<b>Hampshire LADOs</b> Barbara Piddington, Fiona Armfield and Mark Blackwell	01962 876265
<b>Independent Person</b> Anne Greene	0797 666 7473 0208 292 3284 <a href="mailto:agreenesage@gmail.com">agreenesage@gmail.com</a>
<b>Police</b>	101 (999 if an emergency)
<b>Childline (for children and young people)</b>	Tel: 0800 1111
<b>NSPCC</b> <ul style="list-style-type: none"> <li>● Child Protection Helpline</li> <li>● Whistleblowing Helpline</li> </ul>	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> 0808 800 5000 (24/7) 0800 028 0285



<b>Ofsted (EYFS)</b>	0300123 3155
<b>Children's Commissioner for England</b> Dame Rachel de Souza	08005280731 help.team@childrenscommissioner.gov.uk
<b>Prevent/Channel Referrals</b>	020 7340 7264 counter.extremism@education.gov.uk
<b>Education Support Helpline</b>	08000 562 561

### 4.3 The role of the Designated Safeguarding Lead (DSL)

The DSL of Brockwood Park School and Inwoods Small School is Mina Masoumian. She is one of the Co-Chairs of the School Management Committee. She works closely with the members of the SMC who cover the main areas of the school (Pastoral, Curriculum, SENCO), and together with the other Co-Chair, they fulfil any safeguarding reference made to Principal/Headteacher under standards and KCSIE 2024. We are a small unique school with staff members having multiple roles and responsibilities including senior staff members in the SMC.

The DSL is the first point of contact for parents, pupils, teaching and support staff, external agencies and any other parties in all matters of safeguarding and child protection (except in the cases of an allegation against the DSL and the other Co-Chair where processes as outlined in this policy should be followed) and to provide support, advice and expertise on all matters concerning safeguarding.

The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

The DSL also takes the lead responsibility for [Prevent](#) and oversees this in the school to ensure prevention of radicalisation, extremism and being drawn into terrorism.

The DSL will encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

The DSL has regular meetings with SENCOs, the Pastoral Team and the School Management Committee to help promote pupils' educational outcomes through sharing relevant

information about their welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experience.

It is the responsibility of the DSL (and the deputies) to be available to discuss any safeguarding concerns and to arrange adequate and appropriate cover arrangements for any out-of-hours or out-of-term activities to ensure that off-site activities (for example local, national or international trips and excursions) have appropriate safeguarding support/access to the DSL or deputy (via Zoom or Skype, for example, if the DSL or deputies are not in attendance on the trip).

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL; this lead responsibility should not be delegated.

The core responsibility of the DSL is to maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice.

Please see [Appendix 1](#) for more details.

#### 4.4 The role of the Deputy Designated Safeguarding Leads (DDSL)

Deputy Designated Safeguarding Leads (DDSLs) are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. They are also trained in *Prevent* and support the DSL in this role.

In the event of a long-term absence of the DSL, the deputy will assume all of the functions above.

#### 4.5 The role of the Co-Chairs of School Management Committee (SMC)

From a safeguarding perspective, for any reference made to Principal/Headteacher in the standards and *KCSIE*, this role is fulfilled by the Co-Chairs. One of the Co-Chairs is the DSL.

The Co-Chairs are responsible for:

- Ensuring that the *Safeguarding and Child Protection Policy* and related procedures are implemented and followed by all staff.
- Ensuring that the Co-Chair who is the DSL has sufficient time and resources to enable her and her deputies to carry out their roles effectively, including the assessment and support of pupils and attendance at strategy discussions and other necessary meetings.

- Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- Ensuring that pupils' safety and welfare is addressed through the curriculum.
- Ensuring that there is a whole-school approach to safeguarding which involves everyone in the school, places safeguarding at the forefront and underpins all relevant aspects of process and policy development.

#### 4.6 The role of the Trustees

The Trustees hold overall responsibility for devising and implementing a whole school approach to safeguarding and for related policies and procedures including all matters that are subject to this policy and have specific responsibility as described in Part 2 in *KCSIE*.

The Trustees have appointed Wendy Smith, who is also the *Chair of Trustees*, and Gary Primrose as *Safeguarding Liaison Trustees for Child Protection issues*. The Chair of Trustees is responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Co-Chairs.

All trustees receive annual safeguarding and child protection (including online safety) training are up to date with *Keeping Children Safe in Education* including Annex C (Role of the DSL).

The Trustees consider child protection issues at each Trustees' meeting, which are held three times a year at Brockwood Park School. Their role is to provide strategic challenges to test and assure that the schools' approach to safeguarding is secure and robust.

The Trustees are responsible for:

- Ensuring that there is at least one Liaison Trustee who oversees *Safeguarding and Child Protection Policies* in the school.
- Ensuring that the DSL is a member of the senior leadership team and has undertaken training in inter-agency working, in addition to basic child protection training and that this is renewed at least every two years.
- Reviewing the procedures for and the efficiency with which the child protection duties have been discharged.
- Ensuring that any deficiencies or weaknesses in child protection arrangements are remedied without delay.
- Ensuring that the DSL has lead authority for safeguarding, including online safety, and understanding of the school's filtering and monitoring systems.
- Approving amendments to child protection arrangements in the light of changing regulations or recommended best practice.

- Ensuring that procedures are in place for dealing with allegations of abuse made against members of staff including allegations made against the Co-Chairs.
- Ensuring that *Safer Recruitment* procedures are in place that include the requirement for statutory checks on staff suitability to work with children.
- Ensuring a training strategy so that:
  - All staff, including the Trustees and Co-Chairs, receive annual safeguarding and child protection training
  - DSL and DDSLs receive updated child protection training annually to provide them with the knowledge and skills required to carry out the role, allowing for specialist areas such as EYFS. This includes local inter-agency working protocols.
- Ensuring that arrangements are in place so that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding and child protection and receive training when they join.
- The Chair of Trustees, Wendy Smith is responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Co-Chairs.
- Ensuring that those benefiting from, or working with, the charity, are not harmed in any way through contact with it.
- Engaging with students and providing opportunities for their voices to be heard, especially those with protected characteristics, students with SEND or students who identify as LGBTQ+.
- Ensuring that the children at Brockwood and Inwoods are taught about safeguarding and how to keep themselves and others safe, while they are at the school, at home and online.
- Ensuring that the school has appropriate filtering and monitoring systems in place, and reviewing their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
  - Reviewing the DfE's [Filtering and Monitoring Standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- Regularly reviewing the effectiveness of the online filtering and monitoring systems at the Trustees' meetings that take place three times a year.
- Making sure that all staff undergo safeguarding and child protection training every year, including online safety, and ensuring that such training is regularly updated and in line with advice from the safeguarding partners.

- Making sure that staff understand their expectations, roles and responsibilities around filtering and monitoring as part of their safeguarding training.
- Being aware of their obligations under the *Human Rights Act 1998*, in relation to the event of a safeguarding issue that involves harassment, violence and abuse, the *Equality Act 2010*, as well as their local multi-agency safeguarding arrangements.

#### 4.7 The Local Authority Designated Officer (LADO)

The *Local Authority Designated Officer* (LADO) should be advised of all cases where it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed a child.
- Possibly committed a criminal offence against, or related to a child.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved towards a child or children in a way that indicated she or he is unsuitable to work with children.

All allegations should be referred to the LADO for advice before any investigation takes place and within one working day. In borderline cases, these discussions can be held informally and without naming the individual.

There are four LADOs in the Hampshire Safeguarding Unit: Barbara Piddington, Fiona Armfield, Shona McMinn and Amy Puncheon. Fiona Armfield is the dedicated LADO that covers the independent and special schools across the whole county and, as such, she is the named LADO for Brockwood Park School and her email address is: [fiona.armfield@hants.gov.uk](mailto:fiona.armfield@hants.gov.uk). The phone number for Hampshire County Council Safeguarding LADO team is 01962 876364 and the central email address is: [child.protection@hants.gov.uk](mailto:child.protection@hants.gov.uk).

For all initial contacts to the LADO service, we submit a [LADO service initial enquiry form](#). Initial enquiry forms will be reviewed by a LADO and advice provided as appropriate. If further information is required, the school may be asked to complete a [LADO notification form](#).

#### 4.8 Multi-Agency working

Safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. This policy sets out the school's practice both for children who may be at risk of significant harm, as well as children and their families in need of support, to prevent problems escalating. Both Brockwood and Inwoods work with other agencies, in line with locally agreed procedures, as set out by the Hampshire Children's Safeguarding Board / Safeguarding Partners, and follow HSCP (Hampshire and Isle of Wight Safeguarding Children Partnership) procedures.

*Working Together 2023* explains that the three safeguarding partners in relation to a local authority area are defined under the *Children Act 2004* (as amended by the *Children and Social Work Act 2017*) as:

- the local authority
- an integrated care board for an area any part of which falls within the local authority area
- the chief officer of police for an area any part of which falls within the local authority area

For each of these three partners, *Working Together 2023* defines the lead representatives from each as ‘the Local Authority Chief Executive, the Accountable Officer of the Clinical Commissioning Group and a Chief Officer of Police’.

As set out in *Working Together 2023*, the lead representatives can delegate their functions, although they retain accountability for any actions taken on behalf of their agency. In Hampshire, the lead representatives have identified the following senior officers in their respective agencies who have responsibility and authority for ensuring full participation with these arrangements. For Hampshire the lead representatives and agency representatives are:

<a href="#">Hampshire County Council</a>	Chief Executive: Carolyn Williamson  Director of Children’s Services: Stuart Ashley
<a href="#">Hampshire and Isle of Wight Integrated Care Board (on behalf of the 5 Hampshire CCGs)</a>	Chief Executive: Maggie MacIsaa  Director of Quality & Board Nurse: Ellen McNicholas
<a href="#">Hampshire and Isle of Wight Constabulary</a>	Chief Constable: Scott Chilton  Police Chief Superintendent at Hampshire Constabulary: Clare Jenkins

The representatives, or those they delegate authority to, will:

- Speak with authority for the safeguarding partner they represent.
- Take decisions on behalf of their organisation or agency and commit them on policy, resourcing and practice matters.

- Hold their own organisation or agency to account on how effectively they participate and implement the local arrangements.

## 4.9 Parents

The school seeks to work with parents to support students. Each safeguarding concern is assessed by the DSL/DDSL using decision-making criteria. The LADO or Children Services may be contacted as a source of anonymous advice. Following consideration and taking any advice required from the LADO, parents will be contacted regarding any safeguarding concerns involving their child(ren). If a referral to Children's Services is needed, parents will be informed beforehand, unless there is a concern that doing so would put a child at immediate risk of harm or the child does not give consent. In the case of the latter, the school will seek advice from the LADO or Children's Services as to appropriate next steps. In the event of a concern that a child or children may be abusing another child, the school contacts Children's Services for advice without contacting parents and parents can only be contacted with the agreement of Children's Services.

## 4.10 Independent Person

The students have access to an independent person for confidential advice and support. The schools' Independent Person is Anne Greene. She is available to be contacted by both staff and students. Please see the [Key External Contacts table](#) above.

The students and the staff are made aware that she is available to call at any time. She comes into the school at the beginning of term to be introduced in person so that the students and staff are aware of who she is and how she can be contacted.

Her details and details of other people and services are always on the school noticeboard.

## 5 Safer Recruitment Practices

The School operates recruitment under a separate *Safer Recruitment Policy*.

Brockwood Park School and Inwoods Small School follow the Government's recommendations for the safer recruitment and employment of staff who work with children and act at all times in compliance with the *Independent School Standards Regulations*. This applies to all members of the charity, including teaching and non-teaching staff at the school, including part-time staff, temporary and volunteer staff.

Our school endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in *Keeping Children Safe in Education* (September 2024) and *Working Together to Safeguard Children* (December 2023). We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the *Childcare Disqualification Regulations* and *Childcare Act 2006*.

Please refer to the school's *Safer Recruitment Policy* for further details of our recruitment process.

## 6 What do the staff need to know

All staff should be aware of systems within the school which support safeguarding, and these are explained to them as part of staff induction and annual staff training as well as regular updates in staff meetings. This should include the:

- *Safeguarding and Child Protection Policy* for Brockwood Park and Inwoods Small School (which amongst other things include the policy and procedures to deal with child-on-child abuse)
- *Behaviour of Students Policy* for Brockwood Park and *Behaviour Management Policy* for Inwoods Small School (which include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- *Staff Code of Conduct* (which include low-level concerns, allegations against staff and whistleblowing)
- Safeguarding response to children who are missing from education, particularly on repeat occasions and/or prolonged periods → policy and procedure for this is explained in *Student Supervision and Missing Child Policy* for Brockwood Park and *Child Supervision / Lost Child Policy* and the *Attendance Policy / Missing From Education Policy* for Inwoods Small School
- Role of the *Designated Safeguarding Lead* (including the identity of the DSL and any deputies)

All staff should be aware of their local early help process and understand their role in it.

All staff should be aware of the process for making referrals to local authority children's social care and for statutory assessments under the [Children Act 1989](#), especially [section 17](#) (children in need) and [section 47](#) (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments:

**Children in need:** A child in need is defined under the [Children Act 1989](#) as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under [section 17 of the Children Act 1989](#).

**Children suffering or likely to suffer significant harm:** Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under [section 47 of the Children Act 1989](#) if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should



take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect and exploitation.

All staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships which facilitate communication with children and young people

## 7 Safeguarding training

Every new member of staff is required to complete an online training course on safeguarding and child protection. This includes online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This is a comprehensive course chosen by the DSL and Deputy DSLs.

This training is then complemented by a safeguarding induction session by the DSL or Deputy DSL. These sessions are held either before the beginning of term or as soon as possible after term starts and at regular intervals throughout the year for new-joiners.

The induction session explains:

- Staff responsibility for keeping children safe at Brockwood Park School and Inwoods Small School
- The identity and function of the DSLs
- The school's policies on *Safeguarding and Child Protection* and procedures that staff need to know (all the policies can be found on the school websites) – we specify the staff need to read:
  - *Behaviour of Students Policy*
  - *Staff Code of Conduct*

- *E-Safety Policy*
- For Inwoods: *Child Supervision and Lost Child Policy* and *Attendance / Missing from Education Policy*
- For Brockwood: *Student Supervision and Missing Child Policy*
- The induction also covers the relevant updates from all government guidance

All the returning staff are required to complete an online training on safeguarding and *KCSIE* annually before the academic year starts. This is complemented by a session held by DSL and DDSLs to ensure their understanding of the school's policies and procedures on safeguarding and online safety.

In addition to the annual training, all staff receive safeguarding and child protection (including online safety) updates in the staff meetings, as required, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Similar training and update is offered to all Trustees.

The DSL and DDSLs for Brockwood and Inwoods receive annual inter-agency training and attend other courses in the interim, receiving regular safeguarding and child protection updates at least annually. Any update in national or local guidance will be shared with all staff in staff meetings and briefings, then captured in the next whole school training. This policy will be updated during the year to reflect any changes brought about by new guidance.

## 8 Code of Conduct

All members of staff should abide by the *Staff Code of Conduct* and, in particular, follow the good practice guidelines below:

- Treat all young people with dignity and respect
- Watch your language, tone of voice and body language
- One-to-one situations should normally occur only for timetabled activities or lessons, such as small groups, music lessons, performing arts and sports tuition, which should be held in an appropriate venue for the activity; if a child has to be met individually for exceptional or pastoral reasons, this should be in a room with a window in the door; alternatively, the door should be kept ajar
- Don't invade a child's privacy, especially when toileting or washing
- Don't play rough or provocative games
- Don't be sexually suggestive about or to a child, even in fun
- Don't touch a child inappropriately or obtrusively
- Don't scapegoat, ridicule or reject a child
- Don't show favouritism

- Don't involve children in excessive attention seeking
- You may only give lifts to children at the school if your car details are registered with the Bursar
- Any off-site activity must have risk assessment
- Don't share sleeping accommodation with students
- Don't permit abusive peer activities, e.g., bullying, ridiculing, initiation ceremonies (hazing)
- Don't allow unknown adults access to children in your care; visitors should wear a visitor's badge and colour-coded lanyard and be accompanied by a known person
- Use the internet sensibly and responsibly
- Any taking of photographs or moving images should be in accordance with the Brockwood Park School and Inwoods Small School policy on *Taking, Using & Storing Images of Children*
- There are duty, trip and other official mobile phones available; avoid giving personal contact details to students, except in the case of emergencies; electronic exchanges with students should be via school accounts only

For more information on this please see our *Staff Code of Conduct*.

## 8.1 Use of reasonable force

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff, which involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Every member of staff will be involved in discussions regarding de-escalation measures and reducing the need for physical restraint. This will include learning to recognise the signs of escalating anger and how to approach the student in a calm manner with non-violent language. Use of force should always be a last resort when all other identified measures have failed.

## 9 Child abuse and how to recognise it

All school staff members should be aware of the types of abuse, neglect and exploitation so that they are able to identify cases of children who may need help or protection. Knowing

what to look for is vital to the early identification of abuse and neglect. If staff members are unsure, they should always speak to the DSL.

Child abuse can happen to any child in any family. KCSIE defines child abuse as a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. 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. They may be abused by an adult or adults or another child or children.

According to KCSIE, abuse may take the following forms: physical abuse, emotional abuse, sexual abuse and neglect. For more detailed explanations please see [Appendix 2](#).

Every member of staff must be vigilant in recognising possible signs of abuse of children, which may be by other children or adults, at the earliest opportunity. It is the responsibility of each member of staff to act whenever abuse is suspected. A child may be experiencing abuse if he or she is:

- Frequently dirty, hungry or inadequately dressed
- Left in unsafe situations, or without medical attention
- Constantly “put down,” insulted, sworn at or humiliated
- Seems afraid of parents or carers
- Severely bruised or injured or with unexplained mild bruising
- Displays sexual behaviour which doesn’t seem appropriate for their age
- Growing up in a home where there is domestic violence
- Living with parents or carers involved in serious drug or alcohol abuse

Remember, this list does not cover every child abuse possibility. You may have seen other things in the child’s behaviour or circumstances that worry you. For more detailed explanations please see [Appendix 2](#).

## 10 Contextual safeguarding

Assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare. Safeguarding incidents and/or behaviours can be associated with factors outside the school, and/or can occur between children outside the school. All staff, but especially the DSL and DDSLs should be considering the context within which such incidents and/or behaviours occur.

Additional information regarding contextual safeguarding can be found [here](#). The NSPCC also gives detailed information on contextual safeguarding which can be accessed [here](#).

## 11 Early help

All school staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from EYFS through to the teenage years.

All staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

If early help is appropriate, the DSL will support the staff member in liaising with other agencies and professionals, and setting up an inter-agency assessment as appropriate. The case will be kept under constant review. Consideration will be given to making a referral to children's social care if the child's situation does not appear to be improving or is getting worse.

Any child may benefit from early help, but all school and college 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 in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently absent /goes missing from education, care or from home
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a family member in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Is a privately fostered child
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Has experienced child-on-child sexual violence and sexual harassment

For more information on the Hampshire and Isle of Wight Safeguarding Children Partnership thresholds of Early Help, Targeted Early Help and Children's Social Care please follow this [link](#).

## 12 Children with specific educational needs and disabilities (SEND)

Children with SEN and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Being more prone to peer group isolation than other children
- Being more prone to harm both online and offline
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

To address these additional challenges, we consider extra pastoral support for children with SEN and disabilities. We also consider advice from specialist organisations such as [Mencap](#) and [NSPCC](#).

## 13 Procedures for staff for dealing with a disclosure from a child

Dealing with disclosures from a child can be distressing and difficult. The way a member of staff deals with this process is extremely important and must be handled with care. The students are informed as part of their induction who the DSL and DDSLs in the school are, what their roles are, and that they can make a disclosure at any time and to any staff member that they feel comfortable with.

If a child discloses any sort of abuse to a member of staff, reassurance should be given, but it must be made clear to the student that confidentiality cannot be preserved. Staff should listen sympathetically, but take care not to ask leading questions, since this could invalidate any possible legal proceedings. Any disclosure or otherwise gathered information suggestive of child abuse must be investigated immediately. The following 10 key points may be helpful:

- Always stop and listen to anyone who wants to talk to you about incidents or suspected abuse
- Write notes – if not at the time, then straight after

- Never make a promise that you will keep it secret; instead, give reassurance that only those who need to know will be told
- Do not ask leading questions
- Immediately after the discussion, inform the DSL or Deputy DSLs and complete a safeguarding concern form within 12 hours (copies of these forms can be found at the reception at Brockwood, Pastoral Office at Brockwood, the staff office at Inwoods or can be obtained from the DSL); there are also copies in the [Appendix 4](#) of this policy
- Discuss with the DSL whether steps need to be taken to protect the person who may be being abused
- Never attempt to carry out an investigation: Social Services and the Police are trained to do this
- Within 24 hours of the disclosure, the DSL should notify Hampshire Social Services
- Never think abuse is impossible or that the accusation is bound to be wrong
- Young people often tell other young people, rather than adults: ensure that other young people are aware of the issue of abuse and how to report it.

## 14 If staff have concerns about a child

If staff members have any concerns about a child (as opposed to a child being in immediate danger) they will need to decide what action to take. Where possible, there should be a conversation with the DSL to agree on a course of action, although any staff member can make a referral to Children's Social Care. When raising a concern to Children's Social Care, consideration of what is known about the child's wider context (contextual safeguarding) should also be considered and any relevant information should be passed on.

If anyone other than the DSL makes the referral, they should inform the DSL as soon as possible. The local authority should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

See flow chart in [Appendix 3](#) setting out the process for staff when they have concerns about a child. If, after a referral, the child's situation does not appear to be improving, the DSL (or the person who made the referral) should press for reconsideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

## 15 If a child in danger or at risk of harm

If a child is in immediate danger or is at risk of harm, a referral should be made to Children's Social Care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

## 16 Safeguarding issues

With an age range at Inwoods Small School and Brockwood Park School from 4 to 20 years old, we are aware of the potential scope for problems relating to emotional and mental health, body image, eating disorders, self-harm, different forms of abuse and neglect, but also radicalisation and extremism. All staff should have an awareness of safeguarding issues that can put children at risk of harm and be prepared to identify children who may benefit from early help.

All staff are required to read *Keeping Children Safe in Education*, Part One (or Annex A if they are staff who do not work directly with children), and to pay particular attention to Annex B regarding safeguarding and child welfare.

All staff are advised to maintain an attitude of ‘it could happen here’ and always act in the best interest of the child and if any staff has any concerns about a child’s welfare, at any level, they should act on them immediately.

Safeguarding issues all staff should be aware of include:

- Child sexual exploitation (CSE) and child criminal exploitation (CCE)
- Female genital mutilation (FGM)
- Mental health
- Child-on-child abuse
- Serious violence and domestic abuse
- Bullying including cyberbullying
- Children absent from education
- Child missing from home or care
- Drugs
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sharing nude and semi-nude images (sexting)
- Upskirting



- Trafficking

Specific safeguarding issues set out in KCSIE (2024) are listed below. Further explanations of those we haven't described in detail are given in [KCSIE 2024](#).

### 16.1 Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include, in regards to both Inwoods and Brockwood, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) (2015) and its guidance on [Criminal exploitation of children and vulnerable adults: county lines](#) (2023)

### 16.2 Domestic abuse

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

### 16.3 Mental Health

The school promotes good mental and physical health, as well as good emotional wellbeing of the whole school population, by creating a safe and calm environment, appropriate curriculum and the overall ethos.

Mental health issues can be de-stigmatised by educating students and staff. This is done through adviser-student conversations, dedicated *Healthy Living* classes, whole-school *ATWAM* activities and staff mental health education workshops with outside mental health specialists. Positive mental health is also promoted through strong pastoral care which aims to recognise emerging issues as early and accurately as possible. This system follows the assess-plan-to-review approach set out by the [DfE Mental Health and Behaviour in Schools](#) guidance (2018).

Please see the school's *Mental Health Policy* for more information on how we support children with mental health problems.

## 16.4 Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of abuse.

## 16.5 Forced Marriage

Forced marriage is a marriage in which one or more of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of their parents or a third party (such as a matchmaker) in choosing a spouse.

Multi-agency statutory guidance for dealing with forced marriage can be found at [The right to choose: government guidance on forced marriage](#).

It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

## 16.6 Honour Based Violence (HBV)

Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled as such. If staff have a concern regarding a child that might be at risk of HBV, they should activate safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. If in any doubt, staff should speak to the relevant DSL.

## 16.7 Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of Female Genital Mutilation (FGM), or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate the risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice [Guidelines](#).

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. 14 If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See page 160 for further information.

## 16.8 Extremism and Radicalisation

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

**Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.

The school is aware of its duties under the *Counter-Terrorism and Security Act 2015* (“*The Prevent Duty*”). Relevant activities and functions within the school take into account the school’s responsibilities under the Prevent Duty.

The DSL takes the lead responsibility for *Prevent* and oversees this in the school to ensure prevention of radicalisation, extremism and being drawn into terrorism.

If any staff or trustee has any significant concerns about radicalisation, if at all possible they should contact the DSL who will contact the police on 999, although they can make a direct referral depending on the urgency of the situation. For non-urgent enquiries from trustees and staff the DSL will complete a Prevent Referral Form and will contact Hampshire Constabulary on [prevent.engagement@hampshire.pnn.police.uk](mailto:prevent.engagement@hampshire.pnn.police.uk) or call 101. The DSL can also contact Hampshire Children’s Services on 0300 555 1384.

As part of the *Counter-Terrorism and Security Act (2015)*, the school shows due regard for the need to prevent young people from being drawn into terrorism.

To fulfil our duty in this:

- All members of staff will take part in the online general awareness training module which helps frontline staff become familiar with the factors that can contribute to the radicalisation of young people who are vulnerable.
- We will ensure that suitable internet filtering and monitoring is in place, and equip our pupils to stay safe online at school and at home.
- The DSL has completed *Prevent* training to facilitate the further training of Brockwood Park staff. Staff will need to prove their understanding through in-house quizzes produced by the DSL.

- Any young person within the school identified as being at risk of radicalisation will be referred to *Prevent* and, if deemed necessary by the relevant agencies such as the Police, they might be referred to the [Channel programme](#) or asked to take part in Prevent Police-Led Partnerships support programmes to provide support at the earliest possible stage.
- Ideally the children's parents will be a part of this process, but there is no need for their consent when the school believes the child is at risk of serious harm.
- The school will work with 'Safeguarding Partners' (local authorities, chief officers of police, and integrated care boards) to seek advice, support and guidance drawing on multi-agency expertise, to support students and to prevent exposure to extremist views and political indoctrination.

## 17 Child-on-child allegations of abuse and procedures and guidance for staff

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include, but may not be limited to, bullying (including cyberbullying), sexual violence, sexual harassment and sharing nude and semi-nude images. It can also manifest itself in child-on-child relationships through exploitation, criminal, sexual or otherwise. It can also include abuse in intimate personal relationships between children.

Child-on-child abuse should never be dismissed as "banter" or "part of growing up". Both schools have a zero-tolerance approach to child-on-child abuse, but we also take the view that it could be happening here to ensure extra vigilance concerning this issue. Staff should be clear as to the school's policy and procedures with regards to child-on-child abuse outlined below.

It is important to consider the forms abuse may take and the subsequent actions required:

- Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)
- Sexually harmful behaviour/sexual abuse, e.g., inappropriate sexual language, touching, sexual assault, engaging in sexual behaviour without consent
- Bullying (physical, name calling, homophobic, etc.)
- Cyberbullying
- Sharing nude and semi-nude images (sexting)
- Upskirting (taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm)

- Initiation/Hazing (could include actions, including harassment, abuse or humiliation; could be involved in initiation ceremonies)
- Prejudiced behaviour
- Abuse in intimate personal relationships between peers
- Any form of child exploitation (the use of children for someone else's advantage, gratification or profit often resulting in unjust and harmful treatment of the child; it covers situations of manipulation, misuse, abuse, victimisation, oppression or ill-treatment)

The school recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. It also recognises the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously.

Both schools also recognise the scale and impact of sexual harassment and abuse in child-on-child relationships, and that non-recognition or downplaying the scale and scope can lead to a dangerous culture in the setting. Staff must be vigilant and, rather than waiting for a disclosure, recognise young people may not always make a direct report and information may come from overheard conversations or observed behaviour changes. How a setting responds is seen to influence the confidence of others to report what is happening to them. With this in mind the need for a zero-tolerance approach is taken by the pastoral team. We recognise that even if there are no reported cases, such abuse may still be taking place, but not being reported. Training is conducted concerning this issue with all staff members as part of the annual safeguarding training.

The DSL and DDSLs of both schools also consider it part of their role to help provide a space for children's voices. This is done through providing information specifically on child-on-child abuse, as well as allows space for open discussions on this and other difficult topics (i.e., consent, sending nude pictures, etc., as part of our PSHE/RSE curriculum).

#### **Expected action taken by all staff:**

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

- Report any risk of possible abuse to the DSL who will need to refer such abuse to an external safeguarding agency if there are reasonable grounds to believe that a child is suffering significant harm.
- A student against whom an allegation of abuse has been made may be suspended from the school during the investigation.
- The DSL will take advice from the HSCP (Safeguarding Partners) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. This includes

completing the risk and needs assessment to clearly identify the needs and support to be put in place for all concerned.

- If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the HSCP (Safeguarding Partners), parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the HSCP (Safeguarding Partners) and/or the Police as appropriate.
- Students who are in need of additional support from one or more agencies will be connected by the DSL making sure the Common Assessment Framework (CAF) and Team around the Child (TAC) approaches are put in process.

It is important to deal with a situation of child-on-child abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example: do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of child-on-child abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Restorative approaches are actioned such as recognition of responsibility, dialogue, repair, meeting the needs of those affected, including perpetrators and victims, the unmet needs behind the behaviour. Staff should not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

## 17.1 Child-on-child sexual violence and sexual harassment

Sexual harassment is the 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual violence includes rape, assault by penetration and sexual assault without consent. When we reference sexual harassment and violence, we do so in the context of child-on-child sexual abuse.

Sexual violence and sexual harassment can occur between two children of any age and sex, it can occur through a group of children sexually assaulting or sexually harassing a single child or group of children; it can exist on a continuum and may overlap; it can occur online or face-to-face (both physically and verbally) and are never acceptable. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment, and those will more likely be perpetrated by boys. However, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and

kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. With regards to the law, as a school, we make sure we explain, through our e-Safety education, and overall PSHE/RSE programme, that the law is in place to protect children and young people rather than criminalise them.

### **Responding to reports of sexual harassment and sexual violence**

The initial response to a report from a child is important and the response to the report should be immediate. This will have an impact on the confidence of future victims to report or come forward. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. Professional decisions will be made on a case-by-case basis, with the relevant DSL or DDSL taking a leading role and using their professional judgement, supported by other agencies, such as referring the child to Early Help, Children's Social Care and the police as required.

### **Effective safeguarding practices when making a report include:**

- Listening carefully, being non-judgmental and not asking leading questions
- Not promising confidentiality, and sharing the report with those that will support the progressing of it
- Recognising that a child is likely to disclose to anyone they trust, this person should be supported in being respectful to the child
- Remain engaged with the child and preferably make notes immediately after, recording only the facts
- In the case of an online element, not to view or forward illegal images of a child
- If possible, to manage a report with two members of staff present
- Informing the relevant DSL or DDSL as soon as practically possible
- Evaluate associated risks and put in place a risk assessment if necessary

### **What to consider following a report of sexual violence and/or sexual harassment:**

- Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?

- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between children
- Importance of understanding intra-familial harms and any necessary support for siblings following incidents
- Are there ongoing risks to the victim, other children, adult students or school or college staff, and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation
- Where necessary, thoughtful consideration of bail conditions, navigating the legal process, and handling cases involving reports that are unsubstantiated, unfounded, false, or malicious
- Ongoing approach that prioritises safeguarding and providing support to the victim, ensuring continuous consideration of evolving circumstances, and extending support to the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

There must be careful reporting of child-on-child sexual violence and harassment to ensure that we can consider if there are wider cultural issues at play within the school. In recording it separately from other safeguarding issues (in the *Sexual Harassments And Sexual Abuse Log*) we can look out for patterns of concerning, inappropriate and problematic behaviour.

## 17.2 Sharing nude and semi-nude images/youth produced sexual imagery

Creating and sharing nudes or semi-nude images and videos of under-18s is illegal.

The school's approach to sexting is:

- The incident should be referred to the DSL as soon as possible.
- The staff making the referral **must not**:
  - View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
  - Delete the imagery or ask the student to delete it
  - Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
  - Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
  - Say or do anything to blame or shame any young people involved



- The staff should explain to the students that he/she needs to report the incident, and reassure the student(s) that they will receive support and help from the DSL.
- The DSL should hold an initial review meeting with appropriate school staff. The purpose of this meeting is to determine:
  - Whether there is an immediate risk to student(s)
  - If a referral needs to be made to the police and/or children's social care
  - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
  - What further information is required to decide on the best response
  - Whether the images or videos have been shared widely and via what services and/or platforms (this may be unknown)
  - Whether immediate action should be taken to delete or remove images or videos from devices or online services
  - Any relevant facts about the students involved which would influence risk assessment
  - If there is a need to contact another school, college, setting or individual
  - Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or Children's Social Care if:
  - The incident involves an adult
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
  - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
  - The imagery involves sexual acts and any student in the images or videos is under 13
  - The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with the other Co-Chair and other members of staff as appropriate, may decide to respond to the incident without involving the police or Children's Social Care. The decision will be made and recorded in line with the procedures set out in this policy.

- If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the students involved (if appropriate). If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the police immediately.
- The parents will be informed at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.
- All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.
- Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE programme.

The UKCIS have given useful guidance [sharing nudes and semi-nudes](#).

## 18 Abuse by adults on children outside of the school and procedures and guidance for staff

All staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the *Children's Act 1989* that may follow a referral, along with the role they might be expected to play in such assessments.

Staff should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care. All victims are reassured that they are being taken seriously and that they will be supported and kept safe.

- A detailed record of any allegation of abuse must be made at the time of disclosure, and given to the DSL of Brockwood Park and Inwoods, (or in her absence the DDSLs). The matter must not be discussed with anyone else.
- Whenever possible, there should be a conversation with the DSL (or deputies), who will help staff decide what to do if they have a concern. Options include: managing any support for the child internally via the school's own pastoral support processes; an early help assessment; or a referral for statutory services, for example as the child is in need or suffering or likely to suffer harm.
- The student making the disclosure should be told that this must be reported to the DSL of Brockwood Park and Inwoods, or the Deputy DSLs, who, in conjunction with the other Co-Chair of Brockwood Park and Inwoods (Thomas Lehmann) or the Liaison Trustees for Child Protection Matters (Wendy Smith or Gary Primrose), in the case of the Co-Chair's absence, will take advice on the school's course of action – including contact with parents and others, where appropriate. In the most serious

cases contact with the police is required. Any child protection matter must be referred to the local social service department within 24 hours of the disclosure.

- Once the record has been passed on to the (D)DSL the person to whom the disclosure was made will be informed as to whether or not the matter has been referred to Children's Services and/or parents have been informed. It is unlikely that any other staff, apart from the other Co-Chair (Thomas Lehmann), will be given details of the abuse. This is to protect the privacy of the child(ren) and protect them from further abuse. Those who have been abused are particularly vulnerable to further abuse. However, anyone concerned that a matter may not have been appropriately addressed should contact the Children's Services directly.
- The DSL will call in the appropriate assistance, including Hampshire Social Services Child Protection Unit, who will advise on the support of the child (or children in cases where the allegation is against a child), and the passing of information to parents and others, as well as the next steps that will be taken. If Children's Services decide an investigation is required, they will carry that out and this will include contact with parents and the children concerned.
- Pastoral support of a child making a disclosure, or a child who is accused of abusing another, is essential and parents are normally best placed to provide this, working in partnership with the school. The school will discuss appropriate support with Children's Services to ensure that confidentiality isn't compromised and any support doesn't compromise an investigation. If they haven't already done so, the student may then also wish to seek the support of their Student Adviser and/or other trusted adult in the school, and this should be encouraged. It is important to convey to the student a sense of support and sympathy where appropriate.
- If after consulting the LADO a decision is made that a referral to Children's Services is not appropriate, parents of any children concerned will be contacted as soon as possible with details of any concerns, and then the school will aim to work with the student/s and parent/s, as well as relevant colleagues and appropriate external agencies to seek to resolve any issues and ensure appropriate support is in place for the student/s.

## 19 Allegations of abuse against teachers and other staff and procedures and guidance for staff

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career.

This part of the guidance has two sections covering the two levels of allegation/concern:

1. Allegations that may meet the harm threshold.

2. Allegations/concerns that do not meet the harm threshold

## 19.1 Allegations that meet the harm threshold

An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (i.e., behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk)

### 19.1.1 Procedure

In the event of an allegation that meets the criteria above, one of the Co-Chairs or the Chair of Trustees will become the 'Case Manager' and they will take the following steps:

- Contact the LADO immediately or at the latest within one working day
- Conduct basic enquiries in line with the LADO's advice to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The Co-Chair / Chair of Trustee may, on occasion, consider it necessary to involve the police before consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the Case Manager will notify the LADO as soon as practicably possible after contacting the police
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the Case Manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate

- Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. Where the Case Manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, they may make a referral to Children's Services. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details. When a member of staff who is suspended pending the conclusion of an investigation of a child protection nature is also resident in boarding accommodation, arrangements will be made for alternative accommodation
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff at Brockwood Park School or Inwoods Small School can use one of the school counsellors, or another colleague for support
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The Case Manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the *Secretary of State* has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the *Teaching Regulation Agency*.

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

### 19.1.2 Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures:

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### 19.1.3 Specific actions

#### 19.1.3.1 Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, considering information provided by the police and/or children's social care services.

#### 19.1.3.2 Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the *Teaching Regulation Agency* to consider prohibiting the individual from teaching.

### 19.1.3.3 Individuals returning to work after suspension

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

### 19.1.3.4 Unsubstantiated, unfounded, false or malicious reports/allegations

If a report/allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps.

If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

If shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

## 19.1.4 Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

## 19.1.5 Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file). For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the *Independent Inquiry into Child Sexual Abuse* (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### 19.1.6 References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

### 19.1.7 Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### 19.1.8 Non-recent allegations

Where an adult makes an allegation to a 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 the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with local authority children social care and the police. Abuse can be reported no matter how long ago it happened.

## 19.2 Allegations that do not meet the harm threshold (Low-Level Concerns)

Brockwood Park School is a community of students and staff living together and creating an atmosphere of home away from home which is imbued with genuine care, affection and attention. Although Inwoods Small School is a day school, a similar culture also exists in the school. Both schools are small schools and have a very high ratio of staff to students in order to care for the holistic welfare of the students in line with the ethos and intentions of the schools. Relationships therefore are not similar, for example, to a day school of hundreds of students. When considering behaviour of staff in relation to low-level concerns, the above naturally is taken into account in order to consider and define whether the nature of an interaction is a concern or not.

### 19.2.1 Definition of low-level concern

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

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

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

- Being over friendly with children in a way that feels out of character with the community
- Having favourites and so creating divisive and untrustworthy relationships in the schools
- Taking photographs of children on their mobile phone unless specific permission is given by the School Management Committee
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door without good reason
- Using inappropriate sexualised, intimidating or offensive language

### 19.2.2 Sharing/reporting low-level concerns

At Brockwood and Inwoods we ensure that we promote an open and transparent culture in which all concerns about adults, including allegations that do not meet the harm threshold,

are shared responsibly and with the right person. We encourage an open and transparent culture, where no matter how small the concern the staff feel safe sharing with the Co-Chairs, one of whom is the DSL.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Within a supportive environment enable staff to share any low-level concerns they have
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Ensuring that the senior staff listen and believe staff
- Considering whether wider cultural issues have allowed the behaviour to occur
- Reviewing policies and procedures regularly
- Providing extra training if deemed appropriate and necessary

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Low-level concerns which are shared about contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

### 19.2.3 Responding to low-level concerns

If a concern is raised, by completing a *Low-Level Concern Form*, or through a conversation, the Co-Chairs will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved in the concern and any witnesses. If there is a concern about the Co-Chairs, this should be referred to the Chair of Trustees. The *Low-Level Concern Form* can be found at the end of this policy in [Appendix 5](#), or the Co-Chairs can provide a copy.

The Co-Chairs should be the ultimate decision makers in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the Co-Chairs may wish to consult with the LADO and take a more collaborative decision-making approach.

#### 19.2.4 Recording low-level concerns

All low-level concerns will be recorded in writing on the *Low-Level Concerns Log* by the Co-Chairs. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be:

- Kept confidential, held securely and comply with the *DPA 2018* and *UK GDPR*
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold we will refer it to the LADO at the local authority
- Retained at least until the individual leaves their employment at the school

#### 19.2.5 Reference

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

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

All staff must remember that the welfare of the child is paramount. The school's *Whistleblowing Policy* is included in the *Staff Code of Conduct* which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. At Brockwood and Inwoods a culture of openness and trust encourages a culture where staff feel equally responsible for holding the community and so are also able to raise concerns.

All concerns of poor practice or possible child abuse by colleagues, should be reported to the Co-Chair of Trustees in their absence. Complaints about either of the Co-Chairs should be reported to the Chair of Trustees without informing the Co-Chairs.

All information must remain confidential, unless advised otherwise by the police, court or Children's Services. The welfare of the child is essential and this will be the prime concern in terms of investigating an allegation against a person in a position of trust.

Staff should also be aware that the *NSPCC Whistleblowing Helpline* – 0800 028 0285 – is available if they do not feel that the issue can be raised through either the Co-Chairs or the Chair of Trustees.

## 21 Other Safeguarding Responsibilities

### 21.1 Looked-after children

A child who is looked after by a local authority (referred to as a looked-after child) means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority. A previously looked-after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked-after children safe. When dealing with looked-after children and previously looked-after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.

We currently have no looked-after children enrolled in our schools.

### 21.2 Children absent from education

The appropriate school policy should be followed in the event of a child absent from school; this can be found on the staff server. In the case of repeated absence, the DSL or Deputy will contact parents to establish the cause and contact Children's Services if they are not satisfied that absence is appropriate. If a pupil fails to attend school regularly or is absent without leave for more than 10 school days, the LA will be notified. If a pupil leaves the school before the age of 17, and no onward school is given, the school will contact the local authority of the child's place of residence. Where reasonably possible the school will hold more than one emergency contact number for each student.

### 21.3 Unexpected Death of children

Sadly, unexpected child deaths do occur. If the school becomes aware that a child has died then the school must call the *HSCB child death overview panel (CDOP) manager* on 01962 876356, and then complete *CDOP Form A Notification*, which can be downloaded from <https://www.hants.gov.uk/> and email it to: [HCC.4LSCBCDOP@nhs.net](mailto:HCC.4LSCBCDOP@nhs.net).

### 21.4 Preventive strategies

We want to make sure that we have an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive PSHE/RSE curriculum that aims to tackle issues such as prejudiced behaviour and gives children an open forum to talk things through rather than seek one-on-one opportunities to be harmful to one another.

It is important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.

The structure of the school and its ethos naturally gives students a strong voice and encourages them to speak up as well as to support changes and develop acceptable behaviour in the school and among themselves which goes far in helping to create a positive and supportive atmosphere in the school and one where all students understand the boundaries of behaviour before it becomes abusive.

### 21.5 Safeguarding amongst students and the curriculum (teaching students how to keep safe)

Our curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our students. All our staff play a vital role in this process, helping to ensure that all of our students relate well to one another and feel safe and comfortable within the school. We expect all staff to lead by example, and to play a full part in promoting an awareness that is appropriate to their age amongst all our students on issues relating to health, safety (including online) and well-being. All the staff, including all non-teaching staff, have an important role in insisting that our students always adhere to the standards of behaviour set out in our *Behaviour of Students Policy* (and *Behaviour Management Policy* at Inwoods) and in enforcing our *Anti-bullying Policy*. Residential staff have a particularly important role to play.

### 21.6 Relationships and Sex Education (RSE) and Personal, Social, Health and Economic Education (PSHE)

Both Brockwood Park School and Inwoods Small School are aware of the importance of *Relationship and Sex Education* (RSE) as well as *Personal, Social, Health and Economic Education* (PSHE) and have developed strong PSHE/RSE programmes to help students stay safe, and gain important knowledge and skills in these fields.

The topics included in lessons, such as child-on-child sexual violence or sexual harassment are dealt with in a child-centred approach, as are other topics such as LGBTQ+ inclusion to help us counter homophobic, biphobic and transphobic bullying and abuse. We are aware that children who are LGBTQ+, or perceived to be, can be targeted by other children and for that reason we make sure that a trusted adult with whom they can be open is available to them at all times. The curriculum is carefully planned to ensure that topics are dealt with in a thorough but sensitive manner, in an age appropriate way.

Time is allocated in assemblies, *ATWAM* events, *Healthy Living* classes, *Inquiry Time*, floor meetings and student advising to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. We use appropriate opportunities to discuss with the students the unacceptability of bullying and abusive behaviour and to promote appropriate relationships with staff.

For more detailed information please read the Brockwood Park and Inwoods Small School PSHE/RSE policies.

## 21.7 Internet and technology education and E-Safety

Our IT and E-Safety programme aims to teach students to use the internet and electronic equipment safely, inside and outside of school. They are alerted to the dangers posed by adults and young people in person and online; to bully, groom, abuse or radicalise others. Our E-Safety programme is an important way to educate our young people about how to keep themselves and others safe and what to do if they have concerns.

Our *ICT Acceptable Use Policies* for students and those working at the school sets out its expectations of behaviour in relation to use of the internet and ICT and the way in which the school seeks to protect students from the negative aspects of ICT, such as cyberbullying, and build resilience amongst students so that they can protect themselves and others.

For more detailed information please read Brockwood *Use of ICT Mobile Phones and Other Electronic Devices Policy*, Brockwood *E-Safety Policy* and Inwoods *ICT Use, e-Safety and Cookie Policy*.

At Brockwood and Inwoods we aim to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and trustees
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Educate students about online safety as part of our PSHE/RSE programme
- Train new staff, as part of their induction and all other staff at least once a year, on safe internet use and online safeguarding issues including cyberbullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents’ meetings
- Put in place robust filtering and monitoring systems to limit children’s exposure to the 4 key categories of risk (Content, Contact, Conduct and Commerce) from the school’s IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Include online safety in the regular, at least annual, safeguarding updates given to all staff in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

- Review the *Safeguarding and Child Protection Policy*, including sections on online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

The students at Inwoods have no access to mobile phones on the school site.

Where a student misuses the school's ICT systems or internet, we will follow the procedures set out in our *Safeguarding and Child Protection Policy* and *Behaviour of Students Policy*. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Ensuring that any online safety incidents, depending on the incidents, are either logged in the online safety incident log or in the pastoral records and are dealt with appropriately in line with this school's safeguarding policy and procedures.

For more information on this please see our *E-Safety Policy*. This policy sets out the aim, scope, clear roles and responsibilities, education, security and management of information system including filtering and monitoring tools and procedures, incident and response, training and monitoring arrangements,

## 21.8 Arrangement for visiting speakers

The school has clear protocols to ensure that any visiting speakers are assessed, appropriately supervised and suitable. These can be found in the *Guests and Visitors Policy*. The school's responsibility to students is to ensure that they can critically assess the information that they receive as to its value to themselves, and that such information is aligned to the ethos and values of the school and universal human values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

## 21.9 Arrangements for Additional Online Tuition, Appointments and Meetings

The school cannot guarantee the safety of some online platforms used by external practitioners not recommended or organised by the school. Additionally, we cannot carry out recruitment checks on people who are not employees, and we cannot supervise sessions that are conducted in this way. Parents must ensure they are satisfied that their children are adequately safeguarded during online tuition, appointments and meetings. Parents can request access to alternative platforms including Zoom and Skype for the purposes of such sessions.

School staff will of course remain vigilant and if they observe or overhear concerning behaviour in relation to these private sessions, they will follow our safeguarding procedures.

## 21.10 Extended services and off-site arrangements

Where extended school activities are provided by and managed by the school, our own *Safeguarding and Child Protection Policy* and procedures apply. If other organisations

provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective safeguarding, child protection and health and safety arrangements are in place.

### 21.11 Site security and students' supervision

Although Brockwood Park School and Inwoods Small School have a relatively relaxed atmosphere the safety of our students is of paramount importance. There is no staff uniform in any department and the staff do not wear lanyards.

All visitors are required to report to reception at Brockwood and to the office at Inwoods, to wear a visitor's badge and lanyard and be accompanied by an adult member of the school unless they are attending a publicised event or are on a tour with students (in which case there should always be two students present) or staff. If they are visiting the school at a time when reception is closed, they should be met and be accompanied by a member of staff. Staff are required to ensure that all visitors, whether or not they are known, comply with these requirements. Students are encouraged to be polite and welcoming but also to enquire who visitors are and to tell them to report to reception if they are not accompanied by staff.

Boarding accommodation at Brockwood is only accessible by keypad to the students in the relevant wings, the Pavilions and Cloisters, the staff who live and work in them and other relevant staff members. The key code should not be given to other staff, or visitors, working in the area. If the code is breached it should be changed within 12 hours.

Brockwood Park is situated on a rural site. No public footpaths run through the site.

Students are permitted to leave the site unaccompanied by an adult by arrangement with parents/guardians. Unless agreed with parents/guardians they must be accompanied by other students or staff and use the signing in/out process. If a student does not wish for the parents to be informed that they are leaving the site (for example, older students with confidential medical appointments), then the Pastoral Coordinator may give permission for absence but a member of staff should accompany them if they are under 18.

All students receive a thorough induction into the procedures outlined above at the beginning of the school year, as well as frequent reminders.

At Inwoods the main gate to the grounds is kept locked during the day and there is a sign at the entrance with a bell requesting visitors to call and wait until they are greeted by a member of staff. Parents are expected to inform the school in writing if someone other than themselves is collecting. In some cases, when there are multiple people involved in the collection of a child, a password will be agreed on with the parent. No child will be permitted to leave the premises with someone without the consent of the parent or primary carer.

For more information, please see the schools' site security risk assessment.



## 22 Early Years Provision Safeguarding Arrangements

The DSL for EYFS in Inwoods Small School is Mina Masoumian and the Deputy DSLs are Kate Power and Melanie Bacon.

### 22.1 Use of Mobile Phones and Cameras

Inwoods Small School's policy on the use of mobile phones and cameras in the setting can be found in the school's *Taking, Storing, and Using Images of Children Policy*. At Inwoods Small School staff are not permitted to use their personal mobile devices in school, other than in the staff office. Staff who wish to use their personal mobile devices or cameras outside of the school office in the rest of the school grounds must first speak with the Inwoods Coordinator. Staff who act in breach of this may be subject to disciplinary action. Personal phones may be taken off-site on outings and visits for emergency contact, but not for photographic purposes, unless approval from the Coordinator has been obtained. If approved photos are taken, they must be removed from personal phones within 24 hours.

Inwoods has a school mobile phone in one of the school classrooms for emergency calls. The teacher in the year 3 / 4 / 5 classroom also has a tablet for taking images of the children's work. Parents have either consented or prohibited the staff from taking photos of their children by completing the *Publicity Consent Form* as part of the application process of the child. This includes children in the EYFS / Year 1 / Year 2 class, although a digital camera is used to document work in this classroom. Any photos that are taken on the school tablet or camera are then downloaded onto the school system and deleted from the device within 7 days.

See the *Taking, Storing, Using images of Children Policy* for more detailed information on the use of phones and photos. This includes information on the use of cameras and filming equipment by parents.

### 22.2 Intimate Care

The Schools approach to intimate care for EYFS is described in [Appendix 6](#).

### 22.3 Childcare Disqualification

The *Childcare Act 2006* and the application of the *Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018* prohibit anyone who is disqualified under the Regulations, from working in a relevant setting, including in schools, unless the individual in question has been granted a waiver by Ofsted for the role they wish to undertake.

To ensure that as a school we cover our duties in regard to this legislation, as part of the application process for any candidate who will be working at Inwoods Small School, we ask all applicants to complete a Disqualification Declaration Form. We will ask all candidates due

to the fact that Inwoods is a small school and all staff teach and work with all of the children. In this form we will ask if the individual has a conviction that may result in them being barred from working with children or someone living at the same residential address is barred from working with children.

This form is one part of the school's safer recruitment practices. For further details of this process the details can be found in the school's *Safer Recruitment Policy*.

## 22.4 After - School Provision at Inwoods

Inwoods offers parents the opportunity for after school provision. These after school clubs are organised and run by external providers and they operate in the school grounds from 3:30 to 4:30pm. During this time there is always an Inwoods member of staff on site to be available in an emergency and to support the provider.

When new clubs are organised, the DSL ensures that all safer recruitment practices are followed. It is expected that the providers are following the guidance as set out by the [DfE](#) (*After School Clubs, Community Activities and Tuition - Safeguarding Guidance for Providers*).

We review and ensure that the provider's policies and risk assessments are detailed and up to date. As a school we have also completed our own risk assessment to ensure the clubs operate safely.

## Appendix 1: Role of the Designated Safeguarding Lead (DSL)

*Please read in conjunction with the 'DSL role description' in KCSIE (2024).*

As well as adhering to the responsibilities of all staff listed above, the DSL's role includes:

- Being the person most likely to have the full safeguarding picture and, therefore, the most appropriate person to advise on the response to safeguarding concerns
- Take lead responsibility for safeguarding and child protection, including online safety and *Prevent*
- Assist the Governing Body in fulfilling their responsibilities under section 175 or 157 of the *Education Act 2002*
- Attend initial training for the role and refresh this at least every year by attending the initial refresher training and then demonstrating evidence of continuing professional development thereafter
- Ensure every member of staff knows who the DSL is, is aware of the DSL role and has their contact details
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL
- Ensure that whole-school training occurs annually so that staff and volunteers can fulfil their responsibilities
- Ensure any members of staff joining the school outside of this training schedule receive induction post appointment
- Keep written records of child protection concerns securely and separately from the main pupil file and use these records to assess the likelihood of risk
- Ensure that copies of safeguarding records are transferred securely and with confirmation of receipt (separate from pupil files) when a child transfers school
- Ensure that when a pupil transfers school and is on a child protection plan or is a looked-after child, the information is passed to the new school immediately and securely, with confirmation of receipt, and that the child's social worker is informed. The DSL should consider sharing information in advance of transferring the child protection file if that may be in the child's interests, including with the SENCO
- Link with the HSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Contact the LADO on any matter that the DSL considers cannot be dealt with properly internally
- Develop, implement and review procedures in our school that enable the identification and reporting of all cases, or suspected cases, of abuse

## Appendix 2: Definitions of abuse and indicators of abuse

Being subjected to harassment, violence or abuse including that of a sexual nature may breach any or all of the fundamental rights and freedoms that everyone in the UK is entitled to under the *Human Rights Act 1998*. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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.

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see [relevant section](#)).

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

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

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

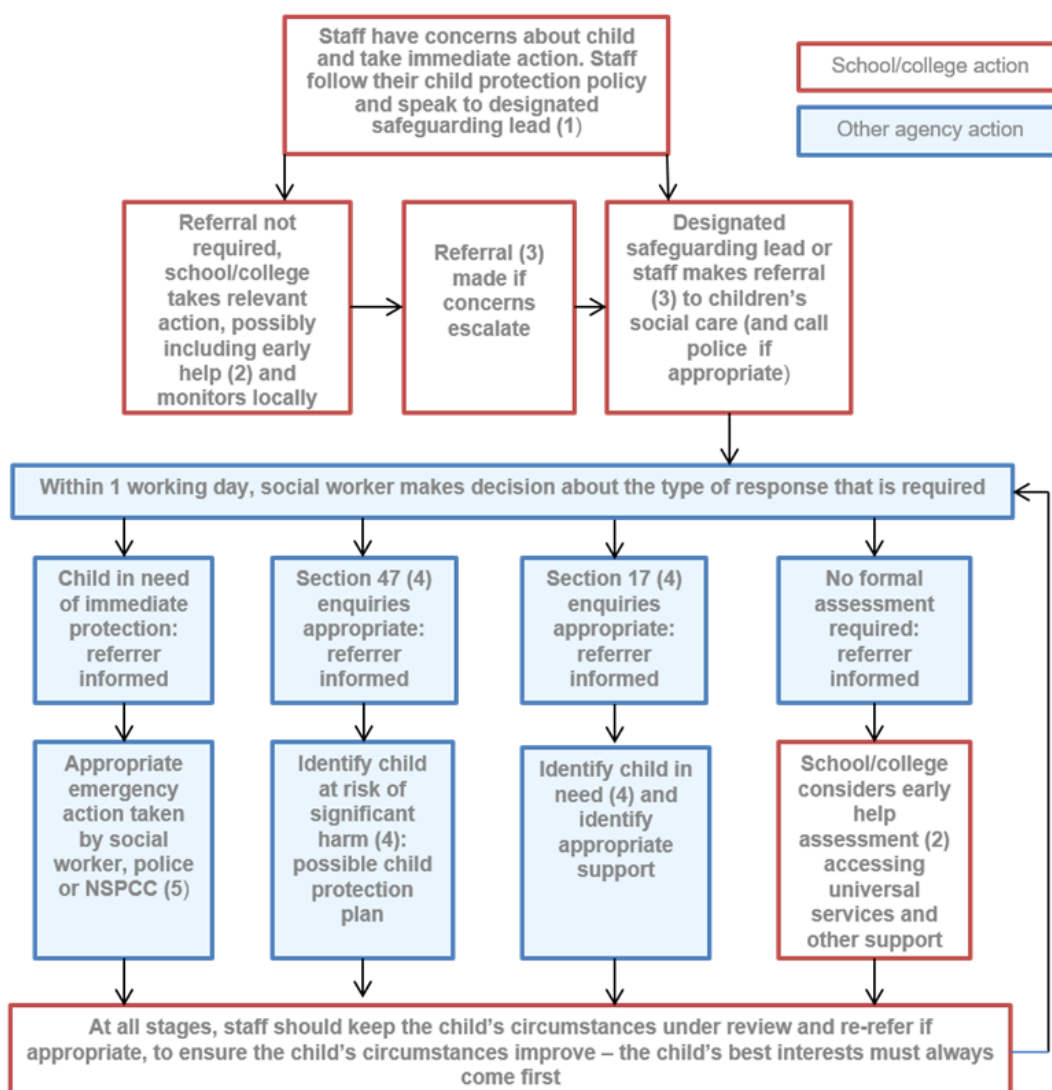
- Have bruises, bleeding, burns, fractures or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather
- Be concerned about changing for PE or swimming
- Look unkempt and uncared for
- Change their eating habits
- Have difficulty in making or sustaining friendships
- Appear fearful
- Be reckless with regard to their own or other's safety
- Self-harm
- Frequently miss school or arrive late
- Show signs of not wanting to go home
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- Challenge authority
- Become disinterested in their school work
- Be constantly tired or preoccupied
- Be wary of physical contact

- Be involved in, or particularly knowledgeable about drugs or alcohol
- Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns – you do not need ‘absolute proof’ that the child is at risk.

## Appendix 3: Referral process to Child Social Services

### Actions where there are concerns about a child



(1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the local authority's referral process. Chapter one of [Working together to safeguard children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of [Working together to safeguard children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

## Appendix 4: Safeguarding Concern Form

Logging a confidential safeguarding record of concern	
Child's name	DOB
Today's date	Time
Your name	Your signature
Your role	
Date of concern/incident	Time of concern/incident

Describe the incident as factually as possible. Include: who was involved, where it happened, exactly what happened, etc. Remember to describe clearly any behavioural or physical signs you have observed. Pass this form to the Designated Safeguarding Lead (DSL) within 12 hours of the incident.

(continue overleaf if necessary)



Check to make sure your report is clear now – and will also be clear to a stranger reading it next year. Include photocopies of any notes taken at the time.

*Section below to be completed by the DSL, DDSL*

Received by.....DSL, DDSL

Date.....Time.....

Proposed action by the Designated Person:

## Appendix 5: Low-Level Concern Form

This form can be used to share any concern with the Designated Safeguarding Lead (DSL) (Mina Masoumian) or the other Co-Chair of Brockwood Park School (Thomas Lehmann), no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that is inconsistent with the schools’ *Code of Conduct* (including inappropriate conduct outside of work) and/or in a way that on first glance does not appear to meet the ‘harm’ threshold.

A concise record is required, including brief context in which the low-level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and/or relevant incident(s). (Continue on separate sheets as necessary). The form should be signed, times and dated.

Details of concern	
Today’s date	
Your name	
Your role	
Your signature	

Received by	
Date	
Time	

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].

NO  - Give a brief but valid reason/explanation for not;

YES  - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

ACTION/S TAKEN:

Was advice/guidance sought from the LADO and or Human Resources? Yes :  No :

Signed

Dated

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the school's *Code of Conduct* and any associated guidance regarding the management of concerns and or allegations and in accordance with school's Data Management practices/policies.

*Low-Level Concern* reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons.

## Appendix 6: EYFS and intimate care

At Inwoods there are a few situations where intimate care is needed, especially those children in the Reception class who struggle with toileting. These guidelines are recommended to help respect their privacy and ensure that the care they need is offered safely.

- Treat every child with dignity and respect and ensure privacy appropriate to the child's age and the situation
- Where possible, the member of staff carrying out intimate care should be someone chosen by the child or young person. For older children it is preferable if the member of staff is the same gender as the young person. However, this is not always possible in practice
- The teacher who is responsible for the EYFS provision will hold primary responsibility for the intimate care of the class
- Involve the child as far as possible in his or her own intimate care. If a child is fully dependent on you, talk with her or him about what you are doing and give choices where possible
- Be responsive to a child's reactions. It is appropriate to "check" your practice by asking the child - particularly a child you have not previously cared for - "Is it OK to do it this way?"; "Can you wash there?"; "How does mummy do that?".
- If a child expresses dislike of a certain person carrying out her or his intimate care, try and find out why. Conversely, if a child has a "grudge" against you or dislikes you for some reason, ensure the school coordinator is aware of this
- Never do something unless you know how to do it. If you are not sure how to do something, ask
- Concerns about a colleague's intimate care practice must be addressed promptly, either with the school coordinator or the DSL team, as appropriate
- Share concerns about your own practices immediately if you are concerned that during the intimate care of a child:
  1. You accidentally hurt the child
  2. The child seems sore or unusually tender in the genital area
  3. The child appears to be sexually aroused by your actions
  4. The child misunderstands or misinterprets something
  5. The child has a very emotional reaction without apparent cause (sudden crying or shouting)
- Intimate care is to some extent individually defined, and varies according to personal experience, cultural expectations and gender
- We recognise that some children who experience intimate care may be more vulnerable to abuse, such as children with SEN, if they are in social care