



# GRANGE SCHOOL

*A Culture of Continuous Improvement*

## SAFEGUARDING (CHILD PROTECTION) POLICY

2023 - 2024 Academic year

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<b>Reviewed by</b>	DSLs Primary/Secondary	Date: September 2023
<b>Approved by GET</b>		Date: September 2023
<b>Adopted by GC</b>		Date: September 2023

<b>Date of Next review</b>	Head of School	September 2024
Regulatory Compliance	Independent School Standards Regulations (2014) National Minimum Standards for Boarding (2015) Keeping Children Safe in Education (2023)	

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# SAFEGUARDING (CHILD PROTECTION) POLICY

## 1. INTRODUCTION

### *Safeguarding is everyone's responsibility*

- 1.1 As a School, Grange School recognises its moral and statutory responsibility to safeguard and promote the welfare of all its pupils and those enrolled on its courses. Every employee, contractor or volunteer who assists at the School is under a general legal duty:
- To protect children from abuse.
  - To be able to identify welfare concerns among pupils and to identify pupils who need additional support.
  - To be aware of the School's child protection procedures, to know how to access them and to follow them.
  - To keep a record of any significant event, complaint or conversation.
  - To report any matters of concern to the Designated Safeguarding Lead (DSL).
- 1.2 This document gives very clear instructions regarding what you should do if you hear or see anything that gives you concern that a pupil at the School may be at risk of harm.
- 1.3 Everyone at Grange should always maintain an attitude of '**it could happen here**' where safeguarding is concerned. When dealing with the welfare of a pupil, you must always act in the best interests of the pupil. You must understand your responsibility to safeguard children and you must appropriately share any concerns that you may have about a pupil.
- 1.4 You should be prepared to identify any pupil that is a 'Child in Need' or would benefit from 'early help', providing support as soon as a problem emerges. In the first instance you should discuss your concerns with the Designated Safeguarding Lead, who may also liaise with other professionals to support early identification and an early help assessment. Such cases will be kept under constant review and consideration will be given to a referral to external agencies where necessary.
- 1.5 There is an important distinction between action required to ensure the welfare of children who need additional support and urgent action to safeguard children who have suffered or are likely to suffer significant harm. **If a child is in immediate danger or is at risk of harm, a referral to the police should be made immediately.** Anyone can make a referral although the Designated Safeguarding Lead should be informed as soon as possible that a referral has been made.

## 2. POLICY AIMS

- 2.1 This policy applies at Grange School and is designed to ensure the welfare of pupils and visiting young people both at Grange School and on authorised activities away from School, such as School trips and expeditions. The policy is reviewed and updated annually or when required by legislative change.

- 2.2 We operate our processes with the best interests of the pupil at their heart. We are proud to operate a culture of safety, equality and protection. Where there is a safeguarding concern, we will try to ensure that the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. We manage this by encouraging pupils to be open and frank about their concerns, and providing support from the safeguarding team or other responsible adults in all child protection matters.

### **Definition of Safeguarding**

- 2.3 Safeguarding and promoting the welfare of children is defined in the Department for Education's *Keeping Children Safe in Education* (September 2021) as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- 2.4 Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of physical abuse, emotional abuse, sexual abuse or neglect (see point 4.2 below). All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children should be treated any less favorably than others in being able to access services which meet their particular needs.
- 2.5 Through PSHE topics, tutorials, and discussions with their Form Tutors, pupils are encouraged to gain an understanding of what constitutes acceptable or unacceptable behaviour on the part of adults or other pupils. We support them in developing their own self-confidence and assertiveness, including awareness of the age of consent and abuse of trust. They are informed about this policy and of the various sources of help available at School. Pupils are also made aware of external sources of support.

### **Legislation and Guidance underpinning this policy**

- 2.6 As with Schools in the UK, we work within a legislative framework that seeks to safeguard and promote the welfare of all children. Our safeguarding policy has been developed in accordance with the principles established in the following:
- The Children Acts 1989 and 2004.
  - The Education Act 2011.
  - The Equality Act 2010
  - Independent School Standards Regulations 2014 (ISSRs) - statutory regulations.
  - Prevent Duty Guidance for England and Wales (July 2015) - statutory guidance.
  - The National Minimum Standards for Boarding Schools (April 2015) (NMS) - statutory guidance.

- The Use of Social Media for Online Radicalisation (July 2015) - non-statutory guidance.
- What to do if you're worried a child is being abused (March 2015).
- Children Missing Education (September 2016) - statutory guidance.

- Teaching Online Safety in School (June 2019) - non-statutory guidance.
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (December 2017).
- Disqualification under the Childcare Act 2006 (September 2018) - statutory guidance.
- Information Sharing - Advice for Safeguarding Practitioners (2018).
- Keeping Children Safe in Education (September 2022) (KCSIE) - statutory guidance.
- Working Together to Safeguard Children (September 2018) (WTSC) - statutory guidance.
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education (May 2019) - non-statutory guidance.
- Prevent Duty: Departmental Advice for Schools (June 2015) - non-statutory guidance.

2.7 This policy should be read in conjunction with our other policies concerning behaviour namely our Behaviour Policy, Preventing Bullying and the Staff Handbook.

### 3. SAFEGUARDING CONTACT DETAILS

- 3.1 Our **Designated Safeguarding Leads (DSL)** are Mrs. Sotunde in the Secondary School and Mrs. Igbokwe in the Primary School. The Assistant Safeguarding Leads are Mrs Itemeh and Mr Durodola respectively. They are the first point of contact for any safeguarding matter relating to pupils. If they are not available, you should contact the Head of School.
- 3.2 If you believe that a pupil is in immediate danger or at risk of harm, you can make an immediate referral to the Police. **Anyone can make a referral.** You should inform the DSL/ADSL as soon as possible that a referral has been made.

### 4. POLICY DETAILS

#### 4.1 A Listening School

We take a child-centred approach and try to ensure that pupils have a voice and are able to express any concerns that they may have. You are reminded that **it could happen here** and that we must always take the concerns of pupils seriously. **Safeguarding is more important than everything else** - you must, without fail, make time to listen to any pupil who shows signs of distress or who wishes to confide in you. Victims of abuse will always be supported (regardless of how long it has taken them to come forward). They will be kept safe and never made to feel that they are causing a hindrance by reporting possible abuse. A victim must never be made to feel ashamed for making a report or have their experience minimised.

#### 4.2 Types of Abuse

- 4.2.1 Abuse involves maltreatment of a child. The definition of child abuse is wide in order to cover all forms of cruelty that children may endure in their lives. 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 happen wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can take four main forms:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

4.2.2 **Physical abuse** is 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.

4.2.3 **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or inadequate, or valued only 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of others. 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.

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

4.2.5 **Child sexual exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

4.2.6 **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of health or development. 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 carers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Domestic abuse

4.2.7 Domestic abuse has been added to the list of safeguarding issues that all staff should be aware of. The guidance makes it clear that domestic abuse:

- can be psychological, physical, sexual, financial, or emotional
- can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

4.2.8 Appendix B of this policy sets out further detail of possible signs of abuse and of grooming.

### 4.3 Procedure to Follow

4.3.1 We follow specific procedures to protect children who are suffering harm or at risk of suffering harm as a result of physical, sexual, and/or emotional abuse or neglect in accordance with Section 157 of the Education Act 2002.

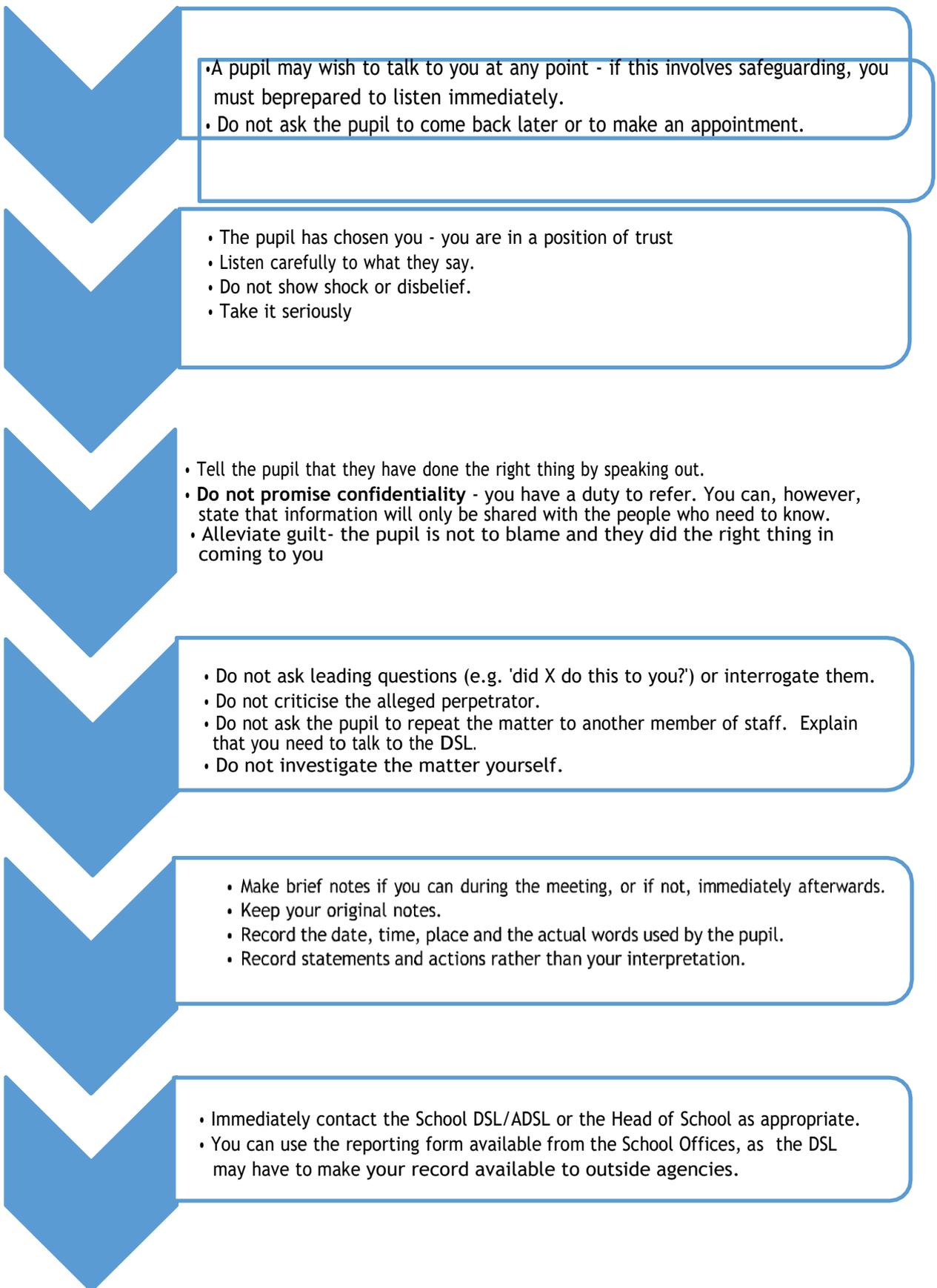
4.3.2 If you are told of any incident or have a strong suspicion of physical, emotional or sexual child abuse or neglect (including attempts to radicalise or coerce individuals to hold extreme political or religious views) occurring in the School, outside the School linked to members of School staff and their families or to a pupil of the School at home or outside the School, you must report this the same day to the DSL/ADSL. In the absence of the DSL, the immediate report should be made to the ADSL. If the allegation or suspicion is about the Head of School, the report should be made to the Governor in charge of safeguarding, Mrs. Taiwo (whose details are held by the School offices) without informing the Head of School.

4.3.3 You should report any abuse of a pupil that you become aware of (or suspect) including any abuse that occurs online. This may include possible abuse of a pupil by a staff member or another adult, abuse at home or perpetrated on their family members, abuse by a stranger, and abuse of a pupil/pupils by another pupil or group of pupils.

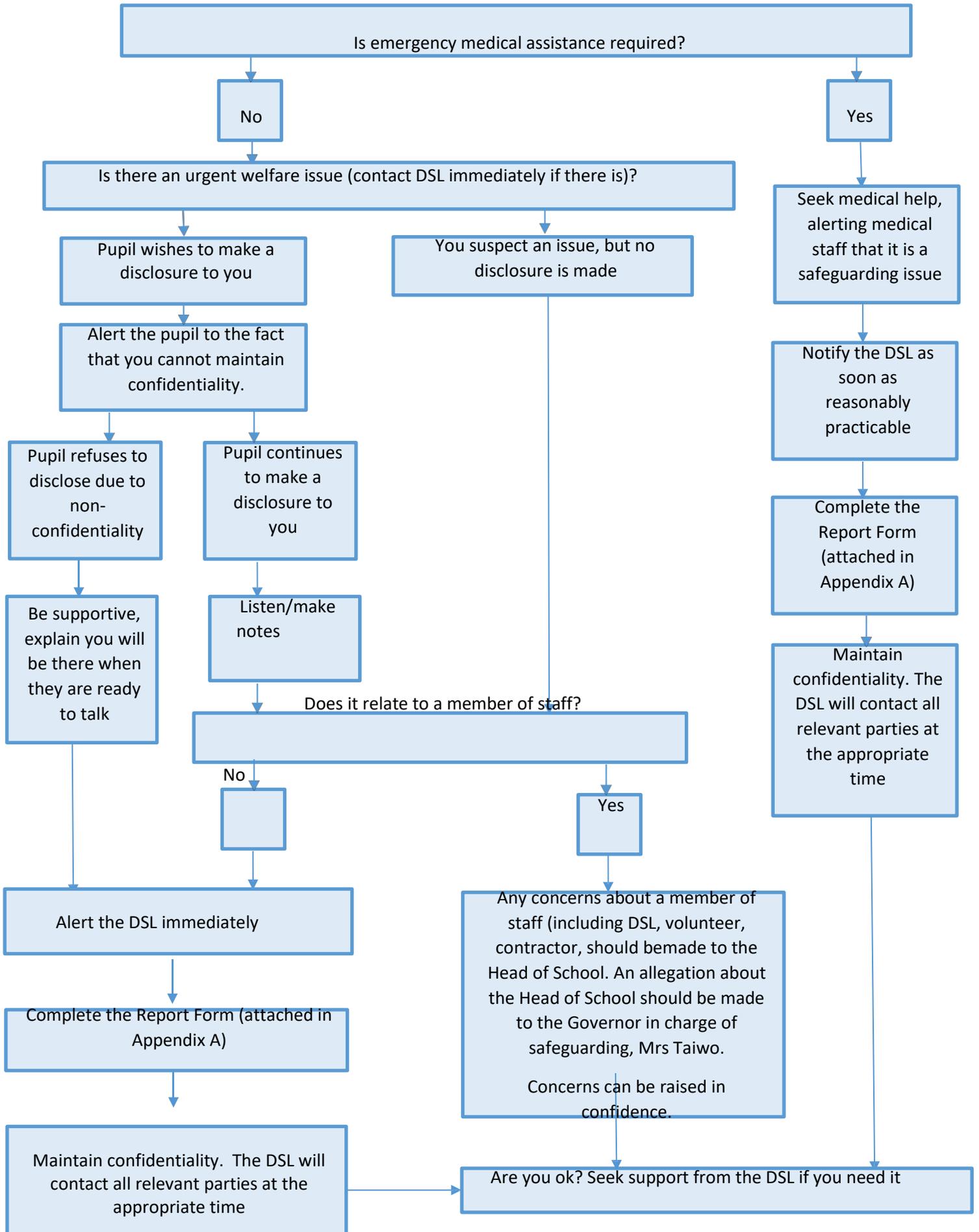
4.3.4 You should be aware that safeguarding incidents and/or risk associated behaviours can be associated with factors outside of the School and occur between young people outside of the School environment. All staff should consider whether children are at risk of abuse or exploitation in situations outside the School (often known as the process of contextual safeguarding). Extra-familial harm can take a variety of different forms including (but not limited to) parental neglect, inadequate supervision, sexual exploitation, criminal exploitation and serious youth violence.

- 4.3.5 School staff (including the DSL/ADSL and the Head of School) must not investigate reports of abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by School staff beyond the point at which it is clear that there is an allegation of abuse.
- 4.3.6 If someone tells you about an allegation of physical, sexual, emotional abuse or neglect you must follow the procedures on the next page. You should record in writing all concerns, discussions and decisions (together with reasons) made under these procedures. You may use our Disclosure Form (Appendix A) for this purpose if you wish and forms are also available at the school offices. This record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. The record should be signed by the person writing it.
- 4.3.7 Do not assume another colleague or professional will take action. Safeguarding is everyone's responsibility. If you are worried about a pupil or have any suspicions, however small, talk to one of Grange's safeguarding team immediately. You do not have to wait for proof of your concerns. **Do not attempt to investigate the issue yourself.**

#### 4.4 What to do if someone makes a disclosure



4.5 What to do if you suspect a pupil is suffering or likely to suffer harm



## 5. CONCERNS ABOUT A PUPIL

### 5.1 Early Help, Child in Need, Child at Risk

5.1.1 Concerns about a pupil may fall into one or more of several categories, of which the most important are as follows:

5.1.2 **Early Help.** Some pupils may benefit from early help, and you are expected to try to identify such pupils where possible. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, if you consider that a pupil may benefit from early help you should discuss this with the DSL. The DSL will consider the appropriate action. The DSL will liaise with external agencies and professionals in an inter-agency assessment, as appropriate.

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

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- was a young carer, or who has siblings who have taken on the primary carer role;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement or association with organised crime groups;
- is frequently missing;
- is misusing drugs or alcohol;
- is at risk of modern slavery, trafficking or exploitation;
- is from a family where circumstances are presenting challenges for the child, such as substance abuse, adult mental health problems, domestic abuse or a family member in prison;
- was previously in care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited; or
- is a privately fostered child.

5.1.4 **A Child in Need** refers to a pupil whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential. These pupils will be referred to external agencies for further advice and support.

5.1.5 **A Child at Risk** is a pupil who is at risk of significant harm (which may or may not be abuse). Such cases will be referred to external agencies for further advice and support.

## 5.2 Pupil at risk of immediate harm

- 5.2.1 If you believe that a pupil is in immediate danger or at risk of harm, you should make an immediate referral to the Police (Gender Desk Office - 0808 1775 590). **Anyone can make a referral.** Any such referral must be made immediately and in any event within 24 hours (one working day) of you becoming aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police. If anyone other than the DSL/ADSL makes a referral, you should inform the DSL as soon as possible that a referral has been made. You should challenge any inaction and follow this up with the DSL as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.
- 5.2.2 Specific concerns about immediate harm may arise where pupils are engaged in close one-to-one teaching, for instance in games coaching, individual music lessons, drama or in one-to-one situations with other School staff.

## 5.3 Pupil at risk of radicalisation

- 5.3.1 We are fully committed to safeguarding and promoting the welfare of all our pupils. Every member of staff recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.
- 5.3.2 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined in the prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- 5.3.3 Signs of radicalisation: There is no single way of identifying an individual who is likely to be susceptible to extremist ideology. It can happen in many different ways and settings. Background factors may contribute to vulnerability and are often combined with influences such as family, friends or online, and with particular needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, you should be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection. You should use your professional judgement in identifying pupils who might be at risk of radicalisation and act proportionately.
- 5.3.4 We recognise that some pupils may be in danger of being drawn into terrorism or other forms of extremism and carry out appropriate risk assessments. This may involve consultation with local partners, such as the police, the Lagos State Ministry of Education and the Child to Child network about the potential risk in the local area. Such risk assessment is discussed with the Head of School and the DSL/ADSL to ensure our safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism. The Risk Assessment is regularly reviewed.

- 5.3.5 We take appropriate measures to ensure that visiting speakers are vetted and that they are always accompanied while on School premises. Pupils are encouraged to critically assess the information they receive and oversight ensures that the ideas disseminated are aligned with the values of the School and fundamental British values.
- 5.3.6 Staff training: The DSL and the Assistant DSLs have undertaken Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. All staff have been made aware of the Prevent duty through training.
- 5.3.7 IT: Suitable filtering is provided and periodically reviewed to keep pupils safe from terrorist and extremist material when accessing the internet in School.
- 5.3.8 Staff receive training relating to online safety as part of their regularly updated safeguarding training as well as within their bespoke annual training sessions for academic and house staff. This training also includes the procedures relating to appropriate filtering and monitoring on school devices and networks and the applicable roles and responsibilities at the school in relation to filtering and monitoring.
- 5.3.9 Procedures: If you are concerned that a pupil may be exposed to radicalisation the normal referral processes apply i.e. you should discuss your concerns with the DSL/ADSL, who will follow the safeguarding procedures outlined in this policy.

#### **5.4 Pupil absent from education**

- 5.4.1 A child absent from education is a potential indicator of abuse. Attendance is registered and staff are aware of how to deal with situations where pupils go missing either from School or on a School trip.
- 5.4.2 We have a thorough attendance monitoring policy and there are clear procedures in place to deal with instances of pupils absent from School. Each tutor and Head of Year is responsible for promptly registering any unexplained absences from his or her divisions, and when it is established that a pupil cannot be accounted for the absent pupil procedure should be triggered without delay.

#### **5.5 Child Exploitation**

- 5.5.1 **Child Criminal Exploitation (CCE):** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity either in exchange for something the victim needs or wants, and/or for the financial or other advantage for the perpetrator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not have to include physical contact, it can also occur through the use of technology. Indicators that may signal a pupil is at risk from or involved with CCE can include increased absences, a change in friendships or relationships with older individuals, a significant decline in performance, signs of self-harm or a significant change in wellbeing. Unexplained gifts or new possessions could also indicate that pupils have been approached by, or are involved with, individuals

associated with criminal networks or gangs. If you are concerned you should contact a member of the safeguarding team.

5.5.2 **Child Sexual Exploitation (CSE):** involves young people who are sexually abused or coerced into sexual activity in the context of exploitative relationships by a person/person of any age, including another young person. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not have to include physical contact, it can also occur through the use of technology. CSE can affect any child or young person under the age of 18, including 16 and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the young person's immediate knowledge(e.g. through others copying images they have created and posted on social media). Indicators of CCE(above) can also be indicators of CSE as can pupils who have older partners and pupils who suffer from sexually transmitted infections.

5.5.3 **Modern Slavery:** encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Staff should be alert for the signs as pupils may be at risk during holiday periods or have friends who are vulnerable to this type of exploitation.

## 5.6 **Child on Child abuse**

5.6.1 Abuse can take place between pupils and this type of abuse can be physical, sexual or emotional in nature. This **Child on Child** abuse can manifest itself in various ways and is most likely to include, but not limited to: bullying (including cyber bullying, homophobic bullying and transgender bullying), gender-based violence / sexual assaults, sexual harassment, initiations and 'sexting' (also known as youth produced sexual imagery). **Child** abuse will not be tolerated; abuse is abuse and must not be passed off as 'banter' or as 'part of growing up'. Victims of **Child** abuse should be supported as they would be if they were the victim of any other form of abuse, in accordance with this policy. If the threshold does not reach the level to constitute a safeguarding investigation, perpetrators will be dealt with in accordance with our Behaviour Policy.

5.6.2 Children may be particularly vulnerable in residential settings. In reflection of that, there are additional requirements for boarding Schools that are set out in the National Minimum Standards for Boarding Schools. All staff should understand that just because there are no reports of Child on Child abuse within a particular unit, tutor group or year group that it does not mean it is not happening, it may simply mean that it is not being reported, therefore it is vital that staff report *any* concerns relating to Child on Child abuse to the DSL immediately.

5.6.3 Child on Child abuse can take the form of harmful sexual behaviour. Through the PSHE programme the School attempts to foster healthy and respectful relationships between pupils, and between pupils and pupils at other Schools - both male and female. You must always take seriously any allegation of sexual misconduct, and follow the procedures outlined in this policy if you are made aware of reports of sexual violence or sexual harassment. You should be aware that rape, assault by penetration or

other forms of sexual assault (including 'upskirting') are crimes and will be reported to the Police. Remember that sharing sexual images of a person under the age of 18 ('sexting') is still illegal even if the culprits are under 18 or if the picture is of themselves. We will at all times follow the guidance outlined in the Department for Education document: Sexual Violence and Sexual Harassment between Children in Schools and Colleges (December 2017).

5.6.4 Much Child on Child abuse takes place online. It can take place wholly online or technology may be used to facilitate offline abuse. Pupils are regularly reminded of the School's policy on bullying and on cyberbullying.

5.6.5 'Upskirting' is a form of abuse which typically involves taking a picture under a person's clothing without their knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It has now been classed as a criminal offence in the UK. This behaviour, if witnessed, should be notified to the DSL immediately. It is important to note that whilst the phrase is 'upskirting' it can apply equally to men and women as in addition to skirts it also includes photographs taken of people wearing shorts or trousers.

5.6.6 Child on Child abuse can manifest itself in many ways both between pupils at Grange School, and between pupils at Grange School and those of other Schools. Some forms of Child on Child abuse are:

- **Bullying:** Bullying is any behaviour that is repeated over time and intentionally hurts another pupil or group of pupils physically or emotionally. It can occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email) and always involves an imbalance of power. It can cause long lasting psychological effects. Bullying which amounts to Child on Child abuse is bullying of a serious or sexual nature between persons of a similar age which results in or has the potential to cause significant harm.
- **Physical abuse:** this includes hitting, kicking, shaking, biting, slapping, or otherwise causing physical harm to another young person.
- **Harmful Sexual Behaviour:** refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive or violent behaviours).
- **Serious Youth Crime (including sexual assault):** includes crimes of the most serious nature including murder, rape and GBH perpetrated on or between young people under 18.
- **Sexting:** this is when someone sends or receives a sexually explicit text, image or video.

Pressuring someone into sending a nude or sexually explicit picture (forced sexting) can happen in any relationship and to anyone, whatever their age, gender or sexual preference, but extra vigilance is required in a residential setting. Once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere or be stored indefinitely.

- **Sexual harassment:** refers to ‘unwanted conduct of a sexual nature’ that can occur both online and offline. Sexual harassment is likely to violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment by other pupils can include:

- Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and calling someone sexualised names.
- Sexual “jokes” or taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes or displaying pictures, photos or drawings of a sexual nature.
- Upskirting.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages and online sexual exploitation, coercion and threats.

5.6.7 In the case of abuse by a pupil, or group of pupils, the key issues identifying the problem as abuse are:

- The frequency, nature and severity of the incidents.
- Whether the victim was coerced by physical force, fear, or by a pupil or group of pupils significantly older than them or having power or authority over them.
- Whether the incident involved a potentially criminal act, and whether if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable.

5.6.8 Where an allegation of abuse against one or more pupils has been made or where you are concerned about Child on Child abuse, the child protection procedures set out in this policy should be followed and the DSL informed. The pupil(s) accused of abuse and the victim of abuse will both be treated as at risk

and a referral will be made to external agencies in respect of either pupil if that pupil is suffering or is at risk of harm.

- 5.6.9 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, we will ensure that parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil.

## **5.7 Online Safety**

- 5.7.1 Many of the concerns described above (for example sexual abuse, severe bullying and extremism and radicalisation) may occur online. We ensure that the School network is appropriately filtered and pupils and staff are guided in the acceptable use of our network and the internet in general (all advice is in line with the Department of Education guidance document, Teaching Online Safety in School 2019).

- 5.7.2 Any evidence that a pupil may be at risk online or indeed being harmed online should be brought to the immediate attention of the DSL so that it can be taken forward as a child protection issue.

- 5.7.3 Staff receive training relating to online safety as part of their regularly updated safeguarding training as well as within their bespoke annual training sessions for academic and house staff.

- 5.7.4 In cases of pupils sexting or sharing pornographic images online, you are reminded that it is illegal to possess, store or distribute an image containing sexual imagery of a child under 18, even if the possessor is under 18 and/or the image shared is of themselves, therefore when taking a disclosure from a pupil concerning this issue you should avoid viewing or forwarding the image and instead alert the DSL or DDSL to the image's existence.

## **5.8 Safeguarding SEND pupils**

- 5.8.1 Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse or 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;
- children with special educational needs and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

- 5.8.2 You must always be prepared to support SEND pupils in expressing any concerns they may have and be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

## **5.9 Safeguarding and Mental Health**

5.9.1 You should consider that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health issue. However, you are well placed to observe pupils day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

5.9.2 If you have a mental health concern about a pupil that indicates they may be suffering, or at risk of suffering serious harm, you must contact the Designated Safeguarding Lead immediately.

## **5.10 Pupil reporting Honour Based Abuse (HBA)**

5.10.1 Honour based abuse is a general term which includes incidents or crimes which have been committed to protect or defend the 'honour' of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. If any evidence of such practices within a family comes to light you must report the matter to the DSL immediately.

## **5.11 Child Abduction**

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

[www.actionagainstabduction.org](http://www.actionagainstabduction.org)

## **5.12 Dealing with allegations against a pupil**

5.12.1 The threshold for dealing with an issue of pupil behaviour under the safeguarding policy is when there is a reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. We will take advice from the DSL on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. If the matter does not reach the threshold for referral to outside agencies or police, the School may nonetheless take action in relation to the allegation in accordance with its own Behaviour Policy and /or the parent contract.

## **6. CONCERNS ABOUT A MEMBER OF STAFF**

### **6.1 Child protection concerns**

6.1.1 If you are concerned about the behaviour of a colleague towards a pupil or pupils you may worry that you have misunderstood the situation or wonder whether a report could jeopardise a

colleague's career. However, any concern about a member of staff must be raised immediately **regardless of how unlikely it seems that there would be any substance to the concern**. No further action may be necessary but it is important that such information is brought to the School's attention as soon as possible. You must remember that in all situations **the welfare of the child is paramount**.

6.1.2 Our reporting procedures for managing concerns/allegations against staff are in line with Part Four of Keeping Children Safe in Education and local safeguarding partner arrangements. They apply when staff have, or are alleged to have:

- 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 he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

6.1.3 **When you report a concern of this nature you can expect:**

- the concern to be taken seriously;
- your identity to remain confidential (if this is your wish), unless you are later required to act as a witness in court proceedings;
- to be protected as far as possible from victimisation or harassment;
- for an initial inquiry to take place to identify any action necessary;
- the Police to be involved if the concern relates to abuse or neglect or the potential commission of a crime;
- written confirmation within the timescales given in the whistle-blowing procedures that your concern has been received and is being dealt with; and
- to be informed of the final outcome where possible, subject to the constraints of confidentiality and legal advice.

6.1.4 If you feel the School is not dealing with a matter in accordance with our procedures, you should follow the Whistleblowing Procedure.

**6.2 How to raise a concern about an adult**

- 6.2.1 If you have child protection concerns about the behaviour of a colleague, or about a School practice, which is likely to put pupils at risk of abuse or other serious harm, you **must** report it immediately, using one of the steps outlined below:
- **Allegations against staff, volunteers or contractors:** If you are making an allegation or complaint against any member of staff (including the DSL), volunteer or contractor, you should report it immediately to the Head of School. The Head of School may, if appropriate, liaise with the DSL about an allegation concerning a staff member.
  - **Allegations against the Head of School:** If you are making an allegation against the Head of School, you should report it to the GC member in charge of safeguarding, Mrs. Taiwo, without notifying the Head of School.
- 6.2.2 Allegations against a staff member who is no longer working at the School or no longer teaching will be referred to the police and any relevant authorities.
- 6.3 What happens when an allegation has been made?**
- 6.3.1 We will deal with any allegation of inappropriate behaviour that harms, or may cause harm to a pupil, as an immediate priority.
- 6.3.2 If an allegation is made against anyone working or volunteering at the school, we will not undertake our own investigation into the allegation without prior consultation with the police, so as not to jeopardise statutory investigations. It is important that staff do not carry out their own investigations prior to informing the Head of School.
- 6.3.3 The Head of School will ensure that the individual against whom the allegation has been made is notified as soon as possible and given an explanation of the likely course of action (unless there is an objection from the police). A named representative will be appointed to keep the individual informed of the progress of the case and to arrange appropriate support.
- 6.3.4 Careful consideration will be given to whether the circumstances of the case warrant suspension whilst the allegation is investigated or whether alternative arrangements can be put in place. Alternative accommodation will be arranged (away from pupils) in cases where a member of boarding staff is suspended pending an investigation of a child protection nature.
- 6.3.5 The Head of School will, after consultation with the police, inform the parents and provide regular updates as soon as permissible.

6.3.6 Where an allegation is made against a staff member not directly employed by us such as supply staff or agency staff, the Head of School will immediately contact the company concerned to discuss the nature, content and context of the allegation, in order that all parties can work together to agree a course of action. We will continue to support any investigation that is required.

#### **6.4 How an individual will be treated if an allegation is raised against them.**

6.4.1 The School's Disciplinary Procedure may apply in the event of an allegation being made.

6.4.2 The School will make every effort to maintain confidentiality and guard against unwanted publicity.

6.4.3 Allegations found to be malicious will be removed from the personnel record of the individual concerned. In all other cases a written record of the decision will be placed on their file in accordance with KCSIE and a copy provided to the individual concerned. Allegations which are false, malicious, unfounded or unsubstantiated will not be included within the individual's future references.

6.4.4 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to outside agencies may be appropriate.

#### **6.5 Reporting low level concerns about adults working for or on behalf of the School.**

6.5.1 Concerns that do not meet the harm threshold are called low level concerns. Examples of these could be using inappropriate language with pupils, being over-friendly, showing favouritism etc. Low level concerns should still be reported to the DSL in order to encourage an open and transparent culture, enabling the School to identify concerning, problematic or inappropriate behaviour early, to minimise the risk of abuse, and to ensure that adults working in or on behalf of the School are clear about professional boundaries and how to act within those boundaries.

6.5.2 Staff should also feel confident to self-refer a low-level concern if they have found themselves in a situation which could be misinterpreted. All low-level concern reports will be handled sensitively and proportionately with the primary aim to strengthen systems within the School's safeguarding system and to support individuals to correct behaviour at an early stage.

6.5.3 All low-level concerns reported to the DSL will be recorded. The record will include details of the concern, the date of the concern, the context in which the concern arose and the action taken. The name of the individual sharing the concerns will also be noted (although if the reporter wishes to remain anonymous this will be respected as far as possible). All records will be kept confidential.

## 6.6 Whistleblowing Procedure

- 6.6.1 You should always feel able to raise concerns about poor or unsafe practices and potential failures in our safeguarding regime. If you have concerns that we are not dealing with a child protection matter in accordance with our stated procedures, you should raise it under the School's Whistleblowing Policy.
- 6.6.2 There will be no retribution or disciplinary action taken against you for making such a report provided that it is done in good faith. Malicious allegations may be considered as a disciplinary offence.

## 7. MANAGEMENT OF SAFEGUARDING

We follow rigorous procedures to ensure that the welfare of pupils is paramount. These include the following:

### 7.1 Safer Recruitment

- 7.1.1 We take seriously our responsibility to recruit staff, contractors and volunteers who are suitable to work with children. The first step to safeguarding all pupils is to appoint staff who share our commitment to the welfare of the pupils.
- 7.1.2 We undertake a rigorous recruitment and screening process, which is in line with the Independent Schools' Inspectorate, *Keeping Children Safe in Education* and National Minimum Boarding Standards regulations. The Human Resources team and other key staff who manage this process are trained in safer recruitment procedures.
- 7.1.3 We Will Take All Reasonable Measures To:
- ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in *Keeping Children Safe in Education (2023)* and the Education (Independent School Standards) (England) Regulations 2014.
  - ensure that we carry out all necessary checks on the suitability of people who serve as staff in accordance with the above regulations and guidance given in *Keeping Children Safe in Education*. This includes background checks and online searches.
  - ensure that where staff from another organisation are working with our pupils either on Grange property or on another site, we have received confirmation that appropriate child protection checks and procedures apply to those staff and that such checks do not raise any issues of concern in relation to the suitability of those staff members to work with children.
  - ensure that where the School ceases to use the services of any person (whether employed, contracted or volunteer) because that person was considered unsuitable to work with children.

This includes dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

7.1.4 The Human Resources Manager is responsible for ensuring that all members of staff are recruited following the procedures defined in Part 3 of KCSIE (2021). This is done in accordance with the School's Recruitment Policy. The HR Manager will ensure that the recruitment checks of all employees are retained on the School's Single Central Register.

7.1.5 Additionally, the HR Manager will ensure that individuals who are engaged in regulated activity with children, including volunteers and those employed by third parties, undergo the appropriate recruitment checks and are included on the Single Central Register where required.

## **7.2 Staff training**

7.2.1 All members of the teaching and support staff receive safeguarding training as part of their induction.

7.2.2 During your induction:

- You will be introduced to the Designated Safeguarding Lead.
- You will also be trained on our Safeguarding (Child Protection) Policy and procedures; including reading KCSIE Part One or Annex A.
- You will learn how to receive a disclosure from a pupil and what to do if you are concerned about the behaviour of a colleague.
- You will also learn about Prevent awareness procedures, online safety for pupils, and the School's safeguarding response to children who go missing from education.
- You will be informed about the School's Whistleblowing Policy, Staff Handbook (which includes acceptable use of IT and staff/pupil relationships) and additional policies relating to safeguarding, including the Pupil Behaviour Policy and the Bullying Policy to ensure that you are aware and confident in the use of all procedures relating to safeguarding. Access to all relevant documents will be provided during induction.

7.2.3 Volunteers are provided with safeguarding induction training that includes:

- The School's Safeguarding (Child Protection) Policy.
- Part 1 and Annex A of Keeping Children Safe in Education (2021).
- The identity and contact details of the DSL.
- Brief guidance notes on our expectations of their behaviour around pupils.

7.2.4 Contractors or visitors to the School receive, as a minimum, the identity and contact details of the DSL and guidance on what to do if they are concerned about a child or a safeguarding practice at the School through a leaflet they are handed in the plaza.

- 7.2.5 The DSL will provide regular update training to all staff throughout the academic year. Update training may take the form of Safeguarding Bulletins, email updates, webinars or presentations during INSET sessions.
- 7.2.6 Compulsory safeguarding refresher training for all staff will take place on an annual basis. DSLs attend suitable training in child protection and inter-agency working every two years. All training records are held by HR, and **staff will be notified of the date of their next training session.**
- 7.2.7 You are required to pay attention to safeguarding issues in all areas of School life, for instance but by no means exclusively, risk assessments for trips, the checks required for the recruitment of staff and volunteers (even if they are to be supervised), planning of staff accommodation in boarding houses, organisation of external events and so on. You will receive full training if you are involved in any of the above.
- 7.2.8 You will regularly be given guidance to ensure that your behaviour and actions do not place pupils, or indeed yourself, at risk of harm or of allegations of harm to a pupil particularly in situations where you are alone with pupils providing one-to-one tuition or assistance. This guidance may come in the form of email updates, department meetings or addendums to the Safeguarding Policy. In particular, the Staff Handbook provides in depth advice for staff relating to appropriate levels of behaviour. This will be discussed during the induction training and periodically thereafter.
- 7.2.9 Any concerns about a member of staff's behaviour towards a pupil or pupils will be dealt with under the School's Staff Disciplinary Procedure, having particular regard to expert advice on child protection issues involving staff and to our legal obligation to report any possible offences.
- 7.2.10 All staff are trained on how to manage and report a disclosure along with specific guidance relating to managing a report of child on child sexual violence or sexual harassment.

### **7.3 Staff Handbook**

- 7.3.1 The Staff Handbook is given to new staff and can be requested as a hard copy document from your line manager. The aim of the Staff Handbook is to provide clear guidance concerning your actions and conduct in order to ensure pupils or staff are not at risk of harm, or of an allegation of harm to a pupil. It sets out the behaviour we expect from all members of staff. It also explains the major policies that you must comply with and where to find them.

### **7.4 Responsibilities of staff members**

You must maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a pupil, you should always act in the best interests of the pupil. We

all have responsibility for ensuring the welfare of the pupils, and you must always appropriately share any concerns that you may have about a pupil.

## **7.5 Responsibilities of the Designated Safeguarding Lead (DSL)**

7.5.1 The DSLs are Mrs. Sotunde and Mrs. Igbokwe who are both members of the school's Executive Team and are the designated senior members of staff who take specific responsibility for child protection matters in the School. They have received enhanced child protection training at the highest level in order to be in a position to train other members of staff. The Assistant DSLs are Mrs Itemeh and Mr Durodola.

7.5.2 The main responsibilities of the Designated Safeguarding Leads are:

- to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection;
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- to refer all cases of suspected abuse to external agencies working with the Head of School where appropriate;
- to co-ordinate the child protection procedures in the School, ensuring that all School staff are aware of the School's Safeguarding (Child Protection) Policy and procedures and know how to recognise and refer any concerns;
- to maintain an ongoing training programme for all School employees, (including volunteers and other individuals working at the School), including induction training for all such individuals, and provide regular updates;
- to ensure all members of staff (and volunteers) have read and understood Part 1 of *Keeping Children Safe in Education* (Department for Education September 2021), or Annex A of KCSIE
- to ensure that senior pupils are formally trained in safeguarding;
- to monitor the keeping, confidentiality and storage of records in relation to child protection which are kept separate from pupil records;
- to keep parents informed of action to be taken under these procedures in relation to their child;
- to liaise with the Head of School to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- to monitor records of pupils in the School who are subject to a child protection plan to ensure that this is maintained and updated as required;
- to liaise with other professionals to ensure that the School contributes to inter-agency working in line with *Working Together to Safeguard Children* (September 2018). This includes providing a co-ordinated

- offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children who are subject to child protection plans;
- to advise and act on all suspicions, concerns and/or evidence of the need for children to receive additional support, or of children who have suffered or are likely to suffer abuse and/or neglect, which are reported to the DSL;
    - where appropriate, to take part in child protection conferences or reviews;
    - to ensure that the School keeps and maintains records of staff training on child protection and safer recruitment procedures;
    - to refer all cases where a crime has been committed to the Police;
    - to ensure that the Safeguarding (Child Protection) Policy is reviewed annually, or more often if necessary, and the procedures and implementation are updated and reviewed.
    - to verify that the Safeguarding (Child Protection) Policy is available publicly and parents are aware of role of the School in referrals about suspected abuse or neglect;
    - to be responsible for online safety for all members of the Grange Community;
    - to keep up to date with child protection policies, regulations and developments, including attending relevant training (at least every two years).

## **8. GOVERNANCE ARRANGEMENTS FOR SAFEGUARDING**

- 8.1 The GC as a whole, is responsible for ensuring all staff at the School are competent to carry out their safeguarding responsibilities, for creating an environment where staff feel supported in their safeguarding role and are able to raise concerns, and to ensure that staff have regular reviews of their own safeguarding practices so that they obtain the knowledge, skills and experience to improve over time. The GC may delegate the day-to-day management of this to the Designated Safeguarding Lead and Executive Leadership Team.
- 8.2 The nominated lead member of the Governing body for Safeguarding is currently Mrs. Taiwo. She has the required knowledge, skills and expertise to take leadership of the School's safeguarding arrangements. She meets regularly throughout the year with the Head of School and DSLs to appraise herself of all ongoing safeguarding matters and to ensure that the School's guidance and policies are consistent with regulatory requirements.
- 8.3 In addition to this, the Grange Executive Team regularly review whether policy and practice in safeguarding are effective and compliant with current legislation.

## Appendix A: Disclosure Form

CAN BE COMPLETED BY A MEMBER OF STAFF IF THEY WISH, TO RECORD A DISCLOSURE MADE TO THEM BY A PUPIL.

Remember:

- ask "open" questions and not leading questions, that is, a question which suggests its own answer.
- listen carefully and keep an open mind.
- do not take a decision as to whether or not the alleged abuse or neglect has taken place.

**Please type or complete in black pen**

<b>Date</b>	
<b>Time</b>	
<b>Place</b>	
<b>Member of staff present and position</b>	
<b>Full name of pupil(s)</b>	
<b>Ask the child to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach to the form.</b>	
A non-exhaustive list of the details to be included:	
<ul style="list-style-type: none"><li>• what was said or done, by whom, to whom and in whose presence.</li><li>• when the incident took place and where.</li><li>• whether the child wishes their parents [or legal guardian] to be informed.</li></ul>	

**Any additional comments or evidence**

Details may include, for example, any concerns you may have about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of School.

Please also include a note of any other evidence, for example, written notes, items of clothing or mobilephone messages relating to the matter.

Signed by:

Print name:

Date:

## Appendix B: Signs of Abuse

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

- the pupil says that he has been abused or asks a question which gives rise to that inference.
- there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries.
- the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour. For example, they may become aggressive, challenging, disruptive or withdrawn.
- the pupil does not want to change clothes in front of others or participate in physical activities
- the pupil is having problems at School, for example, a sudden lack of concentration and learning or they appear to be tired and hungry.
- the pupil talks about being left home alone, with carers that appear to be inappropriate or with strangers.
- the pupil is regularly missing from School or education.
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons.
- the pupil's development is delayed in terms of emotional progress.
- the pupil suddenly loses or gains weight.
- the pupil drinks alcohol regularly from an early age.
- the pupil is concerned for younger siblings without explaining why the pupil talks about running away.
- the pupil shies away from being touched or flinches at sudden movements.
- the pupil demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes.
- the pupil appears neglected, e.g. dirty, hungry or inadequately clothed.
- the pupil is reluctant to go home, or has been openly rejected by his parents or carers.

### Signs of grooming:

The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- meeting pupils secretly, or without seeking authorisation from house parents
- collusive behaviours designed to cultivate dependency, such as:

- unprofessional conversations about other members of staff
- breaking School Rules over providing pupils with alcohol and
- 'friending' pupils on social media platforms, contrary to School policy.

Pupils who are being groomed at School or elsewhere may

- be very secretive, including about what they are doing online.
- have unexplained absences.
- have older friends or girlfriends.
- go to unusual places to meet friends.
- have new belongings such as clothes or mobile phones that they can't or won't explain.
- have access to drugs and alcohol.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

You may find it useful to refer to the Department for Education's guidance *What to do if you're worried a child is being abused* (March 2015).

## **Appendix C: Keeping Children Safe in Education**

It is a condition of employment that you read and understand Part 1 or Annex A of the government document *Keeping Children Safe in Education* (2021).

## **Appendix D: Staff Handbook**

The Staff Handbook can be accessed through the HR Department.