



WINDERMERE  
SCHOOL

## SAFEGUARDING - Child Protection Policy

This Policy is applicable to all pupils, including those in the Early Years Foundation Stage.

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## CHILD PROTECTION

**This Policy is applicable to all pupils, including those in the Early Years Foundation Stage.**

### 1. Windermere School’s Commitment to Safeguarding

Windermere School and Windermere Summer School (henceforth referred to as “the School” unless specific arrangements apply) are fully committed to ensuring that the welfare of all children and young people is their main priority. The School recognises that promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. All staff and any adults who work alongside our children have a duty to take such steps as are reasonable to promote safe practice and to protect children from harm, abuse and exploitation.

The policy applies to all staff and volunteers and any individual has a responsibility to inform the designated person of concerns relating to safeguarding children. The designated person will decide if the concerns should be communicated to Social Care, the police, the NSPCC or other relevant agency.

Our role is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn in safety. We expect respect, good manners and fair play to be shown by everyone so that every pupil can develop his/her full potential and feel positive about him/herself as an individual. All pupils should care for and support each other.

### 2. Policy Basics

This is a detailed policy containing lots of useful and important information, it is however crucial that all staff at Windermere School can access the basics quickly and easily.

Designated Safeguarding Leads	<p>Jenny Davies (Head of Safeguarding – DSL)  <a href="mailto:jdavies@windermereschool.co.uk">jdavies@windermereschool.co.uk</a>                      01539446164 ext. 202</p> <p>Susan Brown (Designated Safeguarding Lead – DSL)  <a href="mailto:sbrown@windermereschool.co.uk">sbrown@windermereschool.co.uk</a>                      01539446164 ext.</p> <p>Julie King (Head of Elleray and Designated Safeguarding Lead)  <a href="mailto:jking@windermereschool.co.uk">jking@windermereschool.co.uk</a>                      015394 43308 Ext 303</p> <p>Andy Bond (Early Years Designated Safeguarding Lead)  <a href="mailto:abond@windermereschool.co.uk">abond@windermereschool.co.uk</a>                      01539443308 ext. 306</p> <p>Rachel Ambler (School Nurse)  <a href="mailto:rambler@windermereschool.co.uk">rambler@windermereschool.co.uk</a>                      01539446164 ext. 231</p>
Chair of Governors	<p>Andrew Chamberlain  <a href="mailto:chairman@windermereschool.co.uk">chairman@windermereschool.co.uk</a></p>
Governor with oversight of safeguarding	<p>Sarah Hamilton  <a href="mailto:shamilton@windermereschool.co.uk">shamilton@windermereschool.co.uk</a></p>
Cumbria Safeguarding Children Partnership CSCP	<p>This replaces the Cumbria LSCB (Local Safeguarding Children Board). It comprises of the Local Authority, Police Service and NHS. The theory being a wider multi agency approach.</p> <p>To contact the CSCP Telephone: 0333 240 1727</p>

<p>Contact details for children's social care</p>	<p>Children in Need and Children at Risk – Advice can be obtained from:  <a href="#">Cumbria Safeguarding Children Partnership</a></p> <p>The Triage Team Telephone: 0333 2401727, for advice or to make a referral.</p> <p>Please note it is Windermere School's policy to discuss any concerns with one of the DSLs or the Head before contacting the CSCP.</p>
<p>Contact details for the LADO  This is for allegations against staff members</p>	<p>If you have a concern about the behaviour of a member of staff and feel that there may be risk/harm happening to a child, you should talk directly to the Head and together you may decide that the LADO needs to be contacted.</p> <p>Go to the Cumbria CSCP website to access the appropriate forms.  <a href="https://cumbriasafeguardingchildren.co.uk/LSCB/professionals/lado.asp">https://cumbriasafeguardingchildren.co.uk/LSCB/professionals/lado.asp</a></p> <p><b>If you have concerns regarding an adult who works with a child, then this should be reported to the Local Authority Designated Officer (LADO) within one working day. To report a concern to LADO please use the notification form:</b></p> <p><a href="#">LADO - Allegation Notification Form (Doc 92KB)</a></p> <p>Send completed forms to the Cumbria Safeguarding Hub, using any of the following methods:</p> <p>(please note: if sending by email it is advised that the document should be password protected) <a href="#">How to password protect a document</a><sup>[2]</sup></p> <ul style="list-style-type: none"> <li>• Tel: 03003 033892</li> <li>• Fax: 01768 812090</li> <li>• Email: <a href="mailto:lado@cumbria.gov.uk">lado@cumbria.gov.uk</a></li> <li>• Post: LADO, Cumbria Safeguarding Hub, Skirsgill Depot, Penrith, Cumbria, CA10 2BQ</li> <li>• Please note if you are worried that a child is at <b>risk of immediate harm</b> please contact the Cumbria Safeguarding Hub on <b>0333 240 1727</b> or see <a href="#">How to refer a child</a></li> </ul> <p>LADO working hours are Monday to Thursday 9am to 5pm and Friday 9am to 4.30pm</p> <ul style="list-style-type: none"> <li>• In case of emergency outside of the above hours please contact <b>Emergency Duty Team</b> on <b>0333 240 1727</b></li> </ul>
<p>How to get advice and support about extremism</p>	<p>In any cases when you feel you need advice regarding extremism you should</p> <ul style="list-style-type: none"> <li>• Talk with one of the DSLs or the Head</li> <li>• Together you may decide to contact the local police on 101</li> <li>• Department for Education Helpline to support schools with advice and guidance about extremism.  <a href="https://www.saferinternet.org.uk/blog/extremism-schools-helpline-teachers">https://www.saferinternet.org.uk/blog/extremism-schools-helpline-teachers</a> Telephone: 02073407264</li> <li>• Preventing extremism in schools and children's services Email: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a></li> </ul>
<p>Contact Details for reporting FGM</p>	<p>FGM (Female Genital Mutilation) is illegal in the UK and a form of child abuse with long-lasting harmful consequences.</p> <p>There is a legal obligation for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18 years.</p> <p>Teachers <b>must</b> personally report to the police cases where they discover that an act of FGM appears to have been carried out. They should if appropriate report their concerns to the DSLs.</p> <p>The duty does not apply to risk or suspected cases and teachers should follow the safeguarding procedures.</p>

### 3. Brief Guide to Child Protection at Windermere School

What to do if:

1. You suspect a child is being abused or neglected:
  - **INFORM** one of the DSLs
  - With the DSL **RECORD any DATES and facts**
2. A child discloses to you abuse by someone else:
  - Allow the child to speak without interruption. **DO NOT INVESTIGATE**
  - Pass no judgement but **ASSURE** them that they are doing the right thing in talking.
  - Advise that you will offer support but that you **MUST PASS ON THE INFORMATION**
  - **INFORM** your DSL
  - With the DSL **RECORD any DATES and facts**
3. You receive an allegation about a member of staff:
  - **IMMEDIATELY INFORM the HEAD**
  - With the Head **RECORD any DATES and FACTS**

IN ALL SITUATIONS YOU MUST REFER. YOU MUST NOT INVESTIGATE

DESIGNATED MEMBERS OF STAFF:

**Head of Safeguarding (DSL) – Jenny Davies**

**DSL – Sue Brown**

**Head of Elleray and DSL – Julie King**

**EYFS DSL – Andy Bond**

**School Nurse – Rachel Ambler**

**IF YOU FEEL YOU NEED TO RING CUMBRIA SAFEGUARDING CHILDREN PARTNERSHIP DIRECTLY PLEASE CALL:**

CSCP Cumbria Safeguarding Hub: 0333 240 1721

### 4. Overview

The proprietors of the School have an explicit responsibility to both safeguard and promote the welfare of children for whom they are responsible. This is part of their duty of care. The responsibility for making sure these arrangements are in place lies with the Governors, in accordance with the guidance given by the Secretary of State. This responsibility is laid down in the following documents:

- Section 175 of the Education Act 2002
- Section 157 of the Education Act 2002 (Pertinent to Independent Schools)
- The EYFS (welfare requirements) Regulations 2012 Section 40 of the Childcare Act 2006
- ISI Regulations 2010 (amended January 2013)
- Keeping Children Safe in Education (September 2019)

#### 4.1 Arrangements for Promoting the Welfare of Children

There are two main aspects to safeguarding and promoting the welfare of children and the School is committed to taking responsibility for the following:

- To take all reasonable measures to ensure that risks of harm to children's welfare are minimised
- To take all appropriate actions to address concerns about the welfare of any child, working in partnership with other local agencies.

This policy document and the procedures outlined are guided by the following frameworks:

- Keeping Children Safe in Education (September 2020) (KCSIE).
- Working Together to Safeguard Children (Feb 2019) (WT)
- Every Child Matters framework.
- The Prevent Duty (June 2015)

## 4.2 General Principles

- The child's needs are paramount and must be put first. Windermere School will always listen to the **Voice of the Child**.
- All children have a right to a childhood free from abuse, neglect or exploitation
- All members of staff and volunteers at the School have a responsibility to be alert to the children's needs and any risks of harm to which a child may be exposed.
- Parents will be informed of any concerns about their child's welfare and any actions taken provided this sharing of information does not compromise the child's safety.
- The School has a responsibility to work effectively with other agencies to ensure the best protection of children in their care.
- If there are concerns about a child's safety, confidentiality cannot be guaranteed and should never be promised.
- When a child is subject to a child protection plan, information about the child will only be shared on a "need to know" basis determined by the Designated Safeguarding Leads.
- The School will educate children in an age appropriate way about their rights to safety and what they should do if they have fears or concerns about any aspect of their lives.
- To provide a broad and balanced curriculum the School will ensure that Safeguarding is taught to all students in an age appropriate manner, this will be delivered generally through the Life Skills programme and will include online safety.
  - This includes the teaching of relevant issues through Relationships and Sex Education (RSE), and that elements of the Life Skills teaching will be mandatory from September 2020.
- The School has systems in place, which deter possible abusers and also manage effectively any allegations or concerns about abuse which arise.

## 4.3 Staff Code of Conduct

- In accordance with the guidance contained in KCSIE (September 2020) Windermere School has a Staff Code of Conduct, reviewed annually.
- The Code of Conduct provides staff with clear guidance about expected behaviour and actions so as to not place pupils or staff at risk of harm or allegations of harm to a pupil.
- Windermere School has tailored this guidance accordingly giving advice about appropriate behaviours with regard to the boarding houses and the EYFS section of the School.
- This document will also contain information about one-to-one tuition, sports coaching, Round Square exchanges, overseas visits, conveying a pupil by car and appropriate electronic communication.
- This document will need to be signed yearly and be kept on individual staff files.

## 5. Procedures and Guidelines to ensure effective Child Protection

### 5.1 Prevention of Child Abuse

The School takes seriously its duty of pastoral care and is proactive in seeking ways to prevent children becoming victims of abuse, neglect or exploitation. The following measures are in place:

- An open culture is in place, which encourages children to share their concerns with any member of staff.
- Through the timetabled and out of curriculum social education opportunities, children are informed of their rights and are aware of the actions to take should they or their peers encounter any actions which make them unhappy or insecure.
- The designated persons and advice on appropriate actions to take, are widely advertised around the School, through the website and in Prep Diaries.
- Pastoral meetings alert staff to any children who may be struggling and ensures that staff are primed to look out for any changes in behaviour.
- All staff are trained regularly to ensure they are comfortable with the required course of action to take should any child disclose information.

## 5.2 Staffing Ratios

To ensure that children are looked after effectively the School will assess each situation and decide on the appropriate staffing ratio. In all sections of the School, except for EYFS this will be judged on the nature of the activity and the age of the children.

### 5.2.1 EYFS staffing Ratios

Windermere School (Elleray Campus) aims to provide a staffing ratio in line with the requirements of the Early Years Foundation Stage Statutory Framework. To meet this aim, the following ratios of adults to children are used:

- Children 3 to 4 years of age –
  - 1:8 where there is no Qualified Teacher Status (QTS), Early Years Professional Status (EYPS), Early Years Teacher Status (EYTS) or another suitable level 6 qualification.
  - 1:13 where members of staff hold QTS, EYPS, EYTS or another suitable level 6 qualification
- Children over 4 years of age –
  - 1:8 where there is no QTS, EYPS, EYTS or another suitable level 6 qualification.
  - 1:13 with members of staff in the Pre School Room with QTS/suitable Level 6 qualification
- Children over 4 years of age (who will reach 5 or older within the School year) – 1:30 with members of staff in the Reception Room with QTS, EYTS or another suitable level 6 qualification.

Windermere School will ensure the safety and protection of all children involved in its activities through adherence to the Child Protection guidelines it has adopted.

## 5.3 Categories of Abuse

The NSPCC defines child abuse as:

“Child abuse is the term used when an adult harms a child or a young person under the age of 18.”

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
- Displaying 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.”

“Abuse is always wrong and it is never the young person’s fault.”

The needs and rights of children fall into the following main categories:

- The need for physical care and protection from preventable harm.
- The opportunity for physical and mental growth and development.
- The need for love and security and the opportunity to relate positively to others.
- The need for new experiences and help in relating to their environment by way of organising and mastering age-appropriate levels of responsibility.
- The need for intellectual development.

A parent must be able to meet those needs or to help their child by ensuring they are otherwise met.

A child may be considered to be abused, or at risk of abuse, by its parents/carers when those basic needs are not being met. Careful professional and legal assessments are essential when determining whether a child’s needs are not being met to such an extent that it contributes abuse.

## Categories of Child Abuse and Their Definitions

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

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

**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 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 (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. The sexual abuse of children by other children is a specific safeguarding issue in education.

**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 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

*KCSIE September 2020*

It must be understood and noted that abuse can take place wholly online and face to face interaction is no longer necessary for abuse to occur. Also technology can be used to facilitate off-line abuse.

### 5.4 Indicators of Abuse – Signs and Symptoms

Child abuse occurs to children of both sexes and of all ages and in all cultures, religions and social classes.

All children have the right to be protected.

Identification of child abuse is difficult and normally requires both social and medical assessment.

The following information on signs and symptoms is not exhaustive and it should also be remembered that abuse might be only one of many causes that could produce any one symptom.

Initially, a situation might not seem particularly serious but it is worth remembering that prompt help to a family in trouble may prevent a more serious situation developing.

## Physical Abuse (Injury)

Non-accidental injury to children by adults is often difficult to detect. Always remember that symptoms that are difficult to explain could be the result of inflicted injuries.

The following provides a guide to the more common non-accidental injuries.

- **Bruises**

Most injuries to children are accidental and can be explained simply; all children receive bumps and bruises as a result of normal play. Most falls or accidents produce one bruise on a single surface, usually a bony surface.

Bruising in accidents is usually on the front of the body as children generally fall forwards; there may be marks on their hands where they have tried to break their fall.

Bruising may be faint or severe.

There may be a pattern to bruising, e.g. after the weekend

- **Unusual sites for accidental bruising**

- Back, back of legs, buttocks
- Mouth, cheeks, behind the ear
- Stomach, chest
- Under the arm
- Genital or rectal areas (be aware if a child is learning to ride a bike, as they may present a level of bruising in these areas)
- Neck

- **Common types of non-accidental injuries**

- Symmetrical black eyes are rarely accidental, although they may occur where there is a fracture of the head or nose. Careful consideration is required whenever there is an injury around the eye
- Bruising in or around the mouth
- Grasp marks on arms
- Finger marks
- Symmetrical bruising (especially on ears)
- Outline bruising (belt marks, hand prints)
- Linear bruising
- Different age bruising on a child at any one time other than on common sites of accidental injury for a child of that age.

- **Bites**

These can leave clear impressions of teeth. Human bites are oval or crescent shaped. If the distance is more than 3 cm across, an adult or another child with permanent teeth must have caused them.

- **Burns**

It can be very difficult to distinguish between accidental and non-accidental burns, but as a general rule burns with clear outlines are suspicious as are burns of uniform depth over a larger area and also splash marks above a main burn area (usually caused by hot liquid being thrown).

Remember also:

- A responsible adult checks the temperature of a bath before a young child gets in
- A child is unlikely to sit down voluntarily in a bath which is too hot and cannot accidentally scald its bottom without also scalding its feet
- A child getting into too hot water of its own accord will struggle to get out again and therefore there will be splash marks
- Small round burns may be cigarette burns

- **Scars**

Children may have scars but notice should be taken of an exceptionally large number of scars, especially when coupled with different age bruising, unusual shaped scars, or large scars which did not receive medical treatment.

- **Fractures**

These should be suspected if there is pain, swelling, deformity and discolouration over a bone or joint. The most common non-accidental fractures are of long bones (arms, legs, ribs). It is rare for a parent to be unaware that a child has been hurt in this way, as the pain caused will cause the child to inform someone.

Factors associated with injuries that may arouse suspicion of being non-accidental are:

- Explanation not consistent with the injury
- Changes of explanation
- Unreasonable delay in seeking medical advice
- A history of frequently repeated injury
- Constant complaints about a child
- Over-hasty or violent reaction to a child's naughty or annoying behaviour
- Unrealistic expectations of a child's performance.

### **Sexual Abuse**

It is essential that professionals in contact with children accept that children of both sexes and all ages are sexually abused.

The abuse is often kept secret by a variety of methods and may carry on for considerable periods of time before it comes to anyone's attention.

Sexual abuse often presents in a veiled way. Although some victims have genital injuries, STIs or are pregnant, most show no signs. Recognition of sexual abuse is more likely to come from a direct statement made by the child rather than suspicious signs or symptoms.

The following are a list of indicators; again the lists are not exhaustive, those marked with an asterisk \* should be taken very seriously:

- **Physical Signs**

- Vaginal bleeding in pre-pubescent girls\*
- Genital lacerations or bruising\*
- STIs\*
- Abnormal dilation of vagina, anus or urethra
- Pregnancy – especially in younger girls with no explanation of the father\*
- Itching, soreness or unexplained bleeding from vagina or anus
- Pain in passing urine
- Frequency or absence of urination (toilet breaks)
- Faecal soiling or retention

- **Behavioural Signs**

- Explicit or frequent sexual preoccupation in talk and play
- Sexually provocative relationship with adults
- Hinting at sexual activity or secrets through word, play or drawing
- Excessive sexual awareness inappropriate to the child's age

- **General**

- Undue fear of adults
- Running away
- Self-harm
- Suicide attempts
- Behavioural problems, withdrawal, wetting or soiling, sleep disturbance
- Behaviour indicating a role reversal in the home e.g. daughter taking over a mothering role
- Inappropriate displays of affection between a child and adult e.g. flirtatious or seductive behaviour.

- **Behaviour especially notable in school**

- Learning problems, poor concentration, sudden drop in performance; although it must be noted that for some sexually abused children, school is a haven and they excel and are often reluctant to leave.
- Marked reluctance to partake in physical activities or to change clothes for activities
- Poor peer group relationships and an inability to make friends
- Regular avoidance and fear of medical examinations.

## **Neglect**

- **Warning signs apart from a child's obviously neglected appearance include:**

- Inappropriate clothing or lack of clothing and an unawareness from the carer that the child is inadequately dressed.
- A child who appears underfed and is frequently unwell with a permanent runny nose
- A child who is left unsupervised or with a variety of different carers
- A child who thrives away from home
- A child with poor language development or other developmental delays
- A child whose parents persistently fail to seek or follow medical advice.

- **Non-Organic failure to thrive**

- Children with poor weight gain
- Poor growth, sparse hair, poor skin tone
- Perverse eating habits, gorging, stealing food, enormous appetite
- Poor sleeping patterns
- Developmental delay
- Solitary behaviours with poor peer group relationships
- Attention seeking from adults.

## **Emotional Abuse**

Emotional abuse may take the form of failure to meet a child's need for attention, affection or stimulation (even though good physical care may be provided) or there may be constant verbal abuse, rejection, scapegoating, and threats of violence or attempts to frighten a child.

Conversely some carers may be so over-protective and possessive that they prevent normal social contact or physical activity. Both states can be difficult to document or evaluate, but there may be crippling long-term effects on a child's development.

### **Children suffering from emotional abuse may:**

- Exhibit excessively clingy or attention seeking behaviour
- Be fearful, withdrawn or emotionally "flat"
- Constantly seek to please
- Be over-ready to relate to anyone, even strangers
- Have an impaired ability for enjoyment or play
- Lack curiosity and natural exploratory behaviour
- Be retarded in language development
- Have a low self-esteem and feelings of worthlessness
- Suffer eating disturbances, growth failure or lack of body tone.

## **Serious Violence**

Staff need to be aware of indicators, which may signal that a child is at risk from, or involved with serious violent crime.

Indicators may include:

- Increased absence from School
- A change in friendships
- New relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing.
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

## 5.5 Risk Factors

### All Forms of Abuse

Certain characteristics have been found to be associated with all forms of abuse, including:

- A history of abuse in the childhood of one or both parents
- Violent behaviour of the parents towards each other, or signs of stress in the adult relationship
- Immature parents often feeling socially isolated
- Parents of low intelligence
- Parents who abuse alcohol or drugs
- Parents with significant mental health problems
- Children born prematurely or with a disability or low birth weights
- Unwanted pregnancies or illegitimate children
- A recent pregnancy in the family
- Situations of social stress in the family
- Situations where there appears to be a lack of bonding in the family
- Children with Special Educational Needs

## 5.6 Abuse of Trust

All staff are made aware that inappropriate behaviour with or towards children is unacceptable. In particular, under the Sexual Offences Act 2003 it is an offence for someone over 18 to have a sexual relationship with a child under 18 where that person is in a position of authority even if the relationship is consensual. This applies even if the child is in the same establishment but not taught by the adult.

## 5.7 Physical Contact with Pupils

Under section 550A of the Education Act 1996 staff have the right to use reasonable force and physical intervention to control or restrain children in order to avert immediate danger or personal injury. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

Corporal punishment is strictly prohibited at Windermere School and all staff are aware of this fact.

Staff are also advised that they ensure any physical contact is in line with being in loco parentis. This means that any necessary physical contact is always appropriate and proportional to the circumstances. The KCSIE points out that a “no contact” policy at a school can leave staff unable to fully support and protect their pupils.

As a boarding school where many children are away from their parents for extended periods of time, staff are also trained that there will be circumstances when physical contact is appropriate when a child is distressed.

## 5.8 Peer on Peer Abuse

In the event of physical or emotional abuse of one child by another child or group of children the situation will be taken seriously and dealt with in line with the school’s anti-bullying policy. Peer on Peer abuse can take many forms. This can include (but it is not limited to) abuse with intimate partner relationships, bullying (including cyberbullying), sexual violence, and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, sexting and initialisation/hazing type violence and rituals, upskirting\*, isolation and derogatory messages through texts and social media,

\*Upskirting typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. **Upskirting is now a criminal offence** (The Voyeurism (Offences) Act, April 2019).

Staff should recognise that children are capable of abusing their peers. Windermere School states that abuse is abuse and should not be tolerated or passed off as “banter” or “part of growing up”.

Windermere School is required to provide Relationship, Sex Education (RSE) to all secondary students and Relationship Education to all primary aged students. Issues such as personal privacy, respect and consent are taught to ensure that our students have a better understanding of how to behave towards their peers, including online.

To minimise the risks of this type of abuse we use the Life Skills programme to educate children in appropriate, respectful behaviour towards all members of our community irrespective of race, religion, gender or beliefs.

Any behaviour which a member of staff deems inappropriate will be discussed with the individuals involved to ensure they understand the consequences of their actions towards others.

Parents will be informed and included in any issues which are seen or perceived by the victim as abusive.

Any allegations will be investigated in line with our discipline policy and children will be interviewed sensitively to establish the facts and allow decisions to be made to move these situations forward.

The victim will be supported in establishing positive and comfortable relationships within their year group whilst giving them a mentor who will be available to give reassurance and discuss any difficult situations moving forward. Should further support be required, the School will identify a suitable professional to work alongside the child.

If it is seen as appropriate for the perpetrator to remain as part of the Windermere School community they will also be supported to ensure they do not make any poorer behaviour choices regarding their relationships with their peers and understand how to relate respectfully, again a mentor will be assigned.

If there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm from another child or group of children, then this information will be referred to the appropriate local agencies, including but not limited to the Police and GP.

In matters where there is suspected sexual abuse the School will always refer its concerns to the Police and CSCP (Cumbria Safeguarding Children Partnership) through the triage team.

## **5.9 Children missing in Education**

A child going missing or running away from an educational setting can act as a vital warning sign of a range of safeguarding possibilities and concerns. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. All staff should follow the School procedures for children who go missing. If a child goes missing on regular occasions the Designated Safeguarding Leads (DSL) will investigate, involve parents if appropriate and seek advice from external agencies.

Windermere School will adhere to the guidelines laid down in the DfE guidance Children Missing in Education. Any children arriving or leaving the establishment at non-standard transition points will be notified to the local authority through the gains and losses system.

Where reasonably possible Windermere School will hold more than one emergency contact number for each pupil.

Windermere School will regularly monitor attendance of its pupils and address it when it is poor or irregular. It will follow the guidance in Annex A of the KCSIE (September 2020) for:

- any pupil who fails to attend school regularly,
- when a parent notifies the School that the pupil is registered at another school,
- any pupil who is absent without permission for a continuous period of 10 school days or more.

For additional details see Policy 3.14b Safeguarding Response to a Missing Child.

## 5.10 Child Criminal Exploitation (CCE)

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

## 5.11 Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

DfE Guidance: [Child sexual exploitation: guide for practitioners](#)

Professionals must also realise that some young people who are being sexually exploited do not exhibit any external signs of abuse. If any Staff member is concerned that any pupil from the School is subject to CSE, they must share their concerns with one of the DSLs.

## 5.12 County Lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

If a child is suspected to be at risk of or involved in county lines, then the DSLs should be informed and a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

### **5.13 'Honour based' Abuse (HBS) (including Female Genital Mutilation and Forced Marriages)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community. They include Female Genital Mutilation (FGM), forced marriages and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. All professionals need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Staff suspecting that a child might be at risk of HBA or who has suffered from HBA, should speak to the DSLs and local safeguarding procedures will be put in place and if necessary the procedures for FGM will be followed.

### **5.14 Female Genital Mutilation (FGM)**

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

The Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18 years.

It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second. They should still consider and discuss any such case with the DSLs and involve outside agencies as appropriate.

The duty does not apply to risk or suspected cases and teachers should follow the safeguarding procedures.

To report FGM to local police - please contact Cumbria Constabulary Telephone 101

### **[FGM Fact Sheet](#)**

### **5.15 Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (for example, if they have learning disabilities). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Windermere School will play its role in safeguarding any of its students from forced marriage.

Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

## 5.16 Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. As when protecting children from other forms of harms and abuse, protecting children from this risk is part of Windermere School's safeguarding approach.

**Extremism** is the 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. This also includes calling for the death of members of the armed forces.

**Radicalisation** is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

There is no single way to identify whether a child is likely to be susceptible to an extremist ideology. Specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods, such as, social media or the internet, and from within the home.

Windermere School works collectively to prevent children being drawn into terrorism and in order to identify individual children at risk of radicalisation and what to do to support them. All teaching and pastoral staff complete online Prevent Duty training.

In addition to this training Windermere School also:

- Educates all ages of children through the Life Skills programme about values, ethics and beliefs promoting awareness, understanding and tolerance of the differing beliefs of all.
- All visiting speakers and volunteers are now assessed before coming into school to ensure they are suitable to work alongside our children and that none of them have any ulterior motive.

Should any member of staff be concerned about a child they will report this immediately to the DSLs who will work with them in line with the Prevent Duty and Channel to resolve any issues regarding radicalisation.

## 5.17 Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience both stressful and distressing. This will, in all likelihood adversely affect their educational attainment. It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is NOT an inevitable part of growing up.
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- Challenging behaviours such as, grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Staff should note that upskirting is now a criminal offence.

Dismissing or toleration any of these behaviours risks normalising them.

All victims must be 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 a sexual violence or sexual harassment. The victim should never be made to feel ashamed for making a report.

All staff must be aware that sexual abuse can happen between children. Peer-on-peer sexual abuse must be considered when safeguarding pupils. (See **5.8 Peer on Peer Abuse**)

### **5.18 Domestic Abuse**

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass is a system that ensures that when police are called to an incident of domestic abuse, where children are present, the police will inform the DSL at School. The aim is that School are informed before the child next comes into school.

Refuge runs the National Domestic Abuse Helpline offering guidance and support for potential victims, as well as those worried about others. Telephone 08082000247 [National Domestic Abuse Helpline](#)

### **5.19 Mental Health**

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

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, speaking to the DSLs.

Guidance:

[Preventing and Tackling Bullying](#)  
[Mental Health and Behaviours in Schools](#)  
[Promoting children and young people's emotional health and wellbeing](#)  
[Rise Above](#)

### **5.20 Other Specific Safeguarding Issues**

The list below gives other issues that might need to be investigated. Whilst we understand we cannot be experts in all areas, the DSLs will when appropriate use other experts and professional organisations to provide up to date guidance and practical support on these other specific safeguarding issues.

- Children and the court system
- Children missing from home or care
- Children with family members in prison
- Homelessness
- Drugs

- Fabricated or Induced Illness (FII)
- Faith Abuse
- Gangs and Youth Violence
- Gender based violence
- Hate
- Private fostering
- Relationship Abuse
- Sexting
- Trafficking

## 5.21 Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside of School and/or can occur between children outside of School. All staff, but especially the DSLs should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means 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. Children's social care assessments should consider such factors so it is important that School provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Under this heading staff should be aware that children exposed in any way to domestic violence and those with SEND will naturally be more vulnerable and therefore possibly at risk.

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at School, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered.

Assessments of children in such cases should consider whether wider environmental factors are present in a child's life and are a threat to their safety and/or welfare. Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare. Interventions should focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to local authority children's social care. Assessments of children in such cases should consider the individual needs and vulnerabilities of each child. They should look at the parental capacity to support the child, including helping the parents and carers to understand any risks and support them to keep children safe and assess potential risk to the child.

## 6. Actions to Take

### Minimising risk

Windermere School requires every member of staff to be vigilant and report any concerns even if they have no evidence and are working on 'gut instinct'. Strong, open and transparent communication will ensure that we minimise the risk of abuse from adults or peers happening to one of our pupils.

### 6.1 Concerns About a Child

If a parent or member of staff has any concerns about a child at Windermere School, they must report it immediately to one of the Designated Safeguarding Leads (DSL). The Head will be informed by the DSLs. For all contact details please refer to Section 2 Policy Basics.

If these people are not available, a parent or staff member should go straight to the Head.

If there is a suspicion that a crime has been committed the police will be called immediately/ within 24 hours/ within 1 working day.

**If a parent or member of staff is dissatisfied with the action taken by the School, they should contact:**

- **The Triage Team on – 0333 240 1727**

You can also email [CSCP@cumbria.gov.uk](mailto:CSCP@cumbria.gov.uk)

- If you need to contact Cumbria Children's Services about an **emergency** when the offices are closed, please contact the **Emergency Duty Team (EDT) Telephone 0332401727**

**Students can also use the numbers above but also have the availability of independent advice from:**

- The Independent Listener – 0771276270
- The School Doctor – 01539488484
- [Childline](#) Telephone: 0800 1111 (24 hours)
- [Kooth](#)
- [Papyrus](#)
- [NSPCC](#) Telephone: 08088005000

For students and adults who may be victims of sexual abuse within an educational environment, appropriate support and advice must be available to them. **The dedicated NSPCC helpline** to support potential victims of sexual harassment and abuse is **0800 136 663**. [Sexual abuse victims schools helpline](#)

## **6.2 An Individual Approach**

Windermere School views each child as an individual and with regard to safeguarding our children the establishment will ensure that each individual situation is dealt with appropriately.

We are also aware that as a Boarding School, there is greater potential for vulnerability of our students being in a residential environment therefore, always aim to be extra vigilant and try to communicate regularly and fully within the staff body to pick up any signs of a child who might be suffering from or at risk of abuse. We are conscious that in a residential setting there is the potential for peer on peer abuse which is monitored extensively within boarding houses and throughout the school environment.

The Pastoral team, working closely with the Designated Safeguarding Leads, will react immediately when they discover a child who has suffered or is at risk of suffering serious harm, reporting to and working alongside Cumbria Safeguarding Children Partnership and the Police.

There may also be children who are not in immediate danger but who need additional support from one or more external agencies. In these cases, we will instigate the appropriate inter-agency referrals.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. Immediate consideration should be given as to how best to support and protect the victim, but it is also vital that the alleged perpetrator is considered and a care plan put in place to ensure that they are adequately supported and educated moving forwards. Other children involved or impacted must also be considered in the pastoral care going forward.

## **6.3 Making A Referral**

**See Appendix 1 - Flow Chart regarding Actions to take where there are concerns about a child.**

The guidance from KCSIE places the responsibility of making decisions regarding referrals with the School's Designated Safeguarding Leads. Windermere School stress that anyone can make a referral, although the preference is to go through the DSLs. Please be aware that in the majority of cases, the DSLs will make the referrals.

It is vital that children receive the right help at the right time to address risks and prevent issues escalating. Cumbria Safeguarding Children Partnership are always prepared to discuss cases and give informal advice and the School encourages the sharing of information with local agencies to ensure the best outcome for each child.

The early signs of abuse and neglect must be acted on, clear records kept, the views of the child listened to and the situation monitored carefully so that original concerns are regularly reassessed and any inaction challenged with the appropriate person or agency.

The Cumbria Safeguarding Children Partnership (CSCP) for Cumbria has full procedures on their website at <https://www.cumbriasafeguardingchildren.co.uk>

Their advice about making referrals is set out within **Appendix 1**. It must always be considered if an Early Help referral is appropriate where a child does not require an immediate child protection response.

It should be noted that in certain cases there is no requirement, although it is considered best practice in most situations, to obtain parental consent in order to refer a case to statutory agencies.

Having considered an Early Help referral, unless your contact is urgent (in which case please telephone 0333 240 1727), please complete the Single Contact form. If you are a professional and your call is considered to be 'urgent' information will be taken over the phone but you will be requested to follow this up with the completion of a Single Contact Form. Only matters considered to be 'urgent' will be taken over the telephone.

Completing the Single Contact Form will not take a long time but it is vital that the Safeguarding Hub receive the key presenting information as clearly as possible, to aid decision making swiftly in the hub.

It is appreciated you may not be able to complete all sections of the form in full. If you wish to discuss your concerns first, please call the hub 0333 240 1727

Professionals from the Police, Health agencies, Children's Social Care and Youth Justice Services are working together to ensure high quality and proportionate support is offered at the earliest opportunity to children, young people and their families.

***If any member of Windermere School is dissatisfied with the response given by Cumbria County Council CSCP then they will go to either the Police or NSPCC for advice on how to proceed.***

#### **6.4 Allegations against Staff**

If an allegation is made against a member of staff, the quick resolution of the allegation will be a clear priority for all involved, and any unnecessary delays will be avoided.

Allegations are naturally taken very seriously. If a child discloses that a member of staff (including the DSLs) or volunteer working at the School has behaved in a way which is abusive, then this information should go straight to the Head. If the Head is not available, the DSLs will communicate directly with the Chair of Governors. If the allegation is about the Head, then the Chair of Governors must be informed directly without informing the Head. Windermere School understands that where an individual is not an employee of School, they still have a responsibility to ensure allegations are dealt with appropriately and that they will liaise with relevant parties; this includes supply teachers and volunteers.

The School will not undertake its own investigations without first consulting with the Local Authority Designated Officer (LADO), or in more serious cases the police, in this way the School will not jeopardise statutory investigations.

The LADO is located within Children and Families Services and should be alerted to all cases in which 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 children, 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.

The LADO will record all concerns, including allegations or offences emanating from outside of work. They will provide advice and guidance and help determine that the allegation sits within the scope of the procedures.

The LADO is involved in the initial phase of the allegation through to the conclusion of the case and will provide advice and guidance to Senior Managers on the progress of cases to ensure they are resolved as quickly as possible. In addition, the LADO will help co-ordinate information sharing with the right

people. They will also monitor and track any investigation with the expectation that it is resolved as quickly as possible.

**If you have concerns regarding an adult who works with a child, then this should be reported to the Local Authority Designated Officer (LADO) within one working day. To report a concern to LADO please use the notification form.**

### [LADO-Allegation Notification Form](#)

The completed forms are sent to the Cumbria Safeguarding Hub, using any of the following methods:

(please note: if sending by email the document should be password protected)

- Tel: 03003 033892
- Fax: 01768 812090
- Email: [lado@cumbria.gov.uk](mailto:lado@cumbria.gov.uk)
- Post: LADO, Cumbria Safeguarding Hub, Skirsgill Depot, Penrith, Cumbria, CA10 2BQ

Please note if you are worried that a child is at **risk of immediate harm** please contact the Cumbria Safeguarding Hub on **0333 240 1727**.

LADO working hours are Monday to Thursday 9am to 5pm and Friday 9am to 4.30pm

In case of emergency outside of the above hours please contact **Emergency Duty Team** on **0333 240 1727**

### [CSCP Allegations against staff or volunteers - further information](#)

In response to an allegation all options will be considered before suspending a member of staff. Suspension will only be used if there is no reasonable alternative after considering assessment based on risk.

As a Boarding School, if the allegation is made against a member of staff who lives in a Boarding House or on site then alternative accommodation will be found for them if they are suspended pending enquiries.

If suspension is seen as the appropriate course of action the reasons and justification will be recorded and the individual will be notified of the reasons for suspension. The School will always give true weight to the views of the LADO in any actions taken regarding allegations against a member of staff.

The School will make every effort to maintain confidentiality and guard against unwanted publicity regarding allegations against a member of staff. Restrictions are enforced up until the point where the accused person is charged with an offence or the DfE or Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

When deciding whether to make a referral, following an allegation or suspicion of abuse, the Head and DSLs should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the local authority designated officer (LADO).

Ofsted should be informed of any allegation or concern made against a member of staff in any day care establishment for children under 8 or against a registered child minder. They should also be invited to take part in any subsequent strategy meeting/discussion. Children's Social Care should inform Ofsted of all allegations made against a foster carer, prospective adopter, or member of staff in a residential child care facility. With specific EYFS regards, Windermere School will inform Ofsted of allegations against people living or working at the premises, or of any other abuse alleged to have taken place on the premises - as soon as practicable and within 14 days at latest.

(Please also refer to: Whistleblowing Policy, 3.7b Version 20)

If an allegation is substantiated and the person is dismissed or the employer ceases to use the person's services or the person resigns or otherwise ceases to provide his or her services, the case manager at Windermere School and the LADO will discuss in the light of current legislation how to refer the case to the DBS for consideration of inclusion on the barred lists. Windermere School understand they are legally required to refer to the DBS when they think an individual has engaged in conduct that harmed, or was likely to harm a child. This report will be made to the DBS within 1 month of the person leaving the School.

Disclosure and Barring Service (DBS)

PO Box 3963  
Royal Wootton Bassett  
SN4 4HH  
Tel 03000200190

Reports made in these circumstances will include as much evidence of the circumstances or the case as possible. Compromise Agreements cannot apply in these circumstances.

The School will also make a referral to the TRA in junction with LADO when a teacher has been dismissed or would have been dismissed if they had not resigned. Referrals will be made if the School considers that the teacher involved could be accused of “unacceptable professional conduct”, “conduct which would bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Essentially these are cases where a dismissal is not sufficient to report to the DBS as soon as possible after the resignation or removal of the individual.

If the School ceases to use the services of a teacher because of serious misconduct, or would have dismissed them had they not left first, the School in consultation with the LADO will consider carefully whether to refer the case to the Secretary of State, as required in sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case and if they find a case to answer then they will decide whether to make a prohibition order in respect of the person.

Allegations which are found to be malicious will be removed immediately from an individual’s record. Any which are unsubstantiated, unfounded or malicious will not be referred to in a reference.

Pupils who are found to have made malicious allegations will be asked to leave the School and could be reported to the police if the School believe there has been a criminal offence committed.

## 6.5 Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse.

Windermere School pays regard to the DfE document: *Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers* and uses the seven golden rules for sharing information:

In brief:

- **Remember that the Data Protection Act is not a barrier to sharing information** but provides a framework to ensure that personal information about living persons is shared appropriately.
- **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be, shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.
- **Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
- **Consider safety and wellbeing:** base your information-sharing decisions on considerations of the safety and wellbeing of the person and others who may be affected by their actions.
- **Necessary, proportionate, relevant, accurate, timely and secure:** ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
- **Keep a record** of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## 7 Responsibilities of the Safeguarding Team

### 7.1 Record Keeping

The School’s records on child protection are kept locked in the DSL’s office, and are separated from routine pupil records. Computer files are password protected and held on My Concern. All relevant Child Protection

documents can only be accessed by the DSLs, the Head, and the Governor with responsibility for Child Protection. Records will be archived indefinitely, combining medical and child protection records.

## **7.2 Governor Oversight**

Mrs S Hamilton is the Safeguarding Governor. The Governors formally consider child protection issues once a year, with day-to-day issues being discussed between the Designated Safeguarding Leads (DSLs) and Mrs S Hamilton when necessary. The policy is reviewed by the Governing body with advice taken from the Pastoral team including the Head and Mrs S Hamilton. The Governors are responsible for:

- Reviewing annually the procedures and policy 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.
- Approving amendments to child protection arrangements in the light of changing regulations or recommended best practice.

## **7.3 Responsibilities of the Designated Senior Leads for Child Protection (DSLs)**

### **7.3.1 Referral**

- Notify police if a child is in immediate danger (this is the only body who have the power to remove a child to a place of safety without court intervention)
- Notify Social Care within 24 hours of a disclosure or suspicion of abuse
- In cases where the child is not in immediate danger
  - A referral should be made to the Safeguarding Hub as early as possible to allow a co-ordinated response with agencies working together.
  - Referral will initially be communicated to the triage team by telephone in urgent cases and via a Single Contact Form.
  - In cases involving EYFS children, Ofsted will be informed of any allegations of serious harm and abuse by any person working or looking after children at the premises, or any other abuse which is alleged to have taken place on the premises and of the resulting action taken. This should be done as soon as reasonably possible.
- Refer cases to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- Refer cases where a crime has been committed to the Police as required.

### **7.3.2 Working with Others**

- Liaise with the Head to inform him of issues especially on-going enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the case manager and the designated officers at the local authority for child protection concerns in cases which concern a staff member.
- Liaise with staff on matters of safety and safeguarding (including online and digital safety) including the pastoral team, school nurses, Learning Support team and the Online Safety Group.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding.
- Liaising with relevant agencies when deciding whether to make a referral.

### **7.3.3 Training and Record Keeping**

- To be adept at identifying signs of abuse and know when it is appropriate to make a referral
- Understand the assessment process for providing early help and intervention through agreed common and shared assessment processes such as Early Help forms.
- To liaise effectively with the Cumbria Safeguarding Children Partnership Board (CSCP) and contribute to proceedings when necessary.
- Have a working knowledge of how local authorities conduct child protection case and review conferences. Be able to attend and contribute to these meetings effectively.
- To ensure that they receive relevant (Level 3) training, including inter-agency training, every 2 years and that staff receive regular training, at least every year with regular updates, in line with CSCP advice.

- In addition to formal training the DSLs at Windermere School will refresh their knowledge through reading any safeguarding developments, meeting as a team and discussing best practice and ensuring good relationships are maintained with other agencies.
- To ensure each member of staff has access to and understands the School's Safeguarding-Child Protection Policy.
- Be alert to the specific needs of children with special education needs and young carers.
- To ensure new staff receive induction training in Child Protection.
- To keep detailed, accurate written records securely.
- Encourage a culture of listening to children and taking into account their wishes and feelings, among all staff.
- Recognise the unique risks associated with online safety and be confident that they have the relevant up to date knowledge to keep children safe whilst they are online.
- Recognise the additional risks that children with SEN and disabilities face online, for example, from online bullying, grooming and radicalisation and are confident to support these children online.

#### **7.3.4 Raising Awareness**

- Ensure the Safeguarding-Child Protection Policy is reviewed and updated annually and relevant parts brought to the attention of staff, parents, volunteers and students.
- Ensure that parents are aware that they should be aware of the contents of the Safeguarding - Child Protection Policy
- Ensure pupils are aware of their rights and know who to talk to in the event that they wish to disclose information concerning a child protection matter
- Link with the local CSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding

#### **7.3.5 Child Protection File**

- Where children leave the School ensure their child protection file is copied in a secure form for any new school as soon as possible but sent across separately from their main school file. The DSLs will communicate with the relevant safeguarding personnel at the new school.
- Should the child be moving to another country the DSLs will endeavour to communicate any child protection issues with the relevant persons.
- In addition to the file, the DSLs will consider whether it would be appropriate to share any other information with the new school in advance of a child leaving. For example, information which would allow the new school to continue supporting victims of abuse and ensure that they have the support in place when the child arrives at the new setting.

#### **7.3.6 Availability**

- During term time the DSLs will be available during school hours for staff to discuss any safeguarding concerns. Staff will be informed if a particular DSL is absent.
- The DSLs will generally be available in person between 8am and 5pm Monday – Friday. Outside these hours and at weekends a named DSL will be available to the Boarding Team for advice and assistance.
- During holiday periods a system of Safeguarding advice will be available to the Windermere School community through the central office on 01539446164 and through 'out of hours' messages. All staff will be encouraged to have a signposting message to the safeguarding email during the holidays when they may not check their emails as regularly. The [safeguarding@windermereschool.co.uk](mailto:safeguarding@windermereschool.co.uk) email will have an in-depth 'out of hours' message, signposting members of the School community to guidance and support links. These will include links such as (but not an exhaustive list) Kooth, Childline and the NSPCC. The School website also has information links to places of guidance and support.
- In the case of out of hours/out of term regulated activity, Windermere School will arrange adequate and appropriate cover arrangements for safeguarding. This will be in cases when the usual term time arrangements are disrupted or when regulated activity is happening during holiday times.

#### **7.3.7 Accountability**

- The Designated Safeguarding Leads are accountable on a daily basis to the Head and ultimately to the governing body who have overall responsibility for this aspect of the School.

- Where a member of staff feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:
  - General guidance on whistleblowing can be found via: [Whistleblowing](#)
  - The NSPCC's – What you can do to report abuse dedicated helpline [NSPCC What to do](#) is available.
  - Staff can call 0800 0280285 between 0800 and 2000 Monday to Friday and email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 8. Induction and Training

Safeguarding–Child Protection training is a central part of what we do at Windermere School. We aim to ensure that the staff team are alert to the signs of abuse and bullying and know the procedures for recording and referring any concerns.

- The Designated Safeguarding Persons will be trained at least every two years in Child Protection and Inter Agency working.
- All staff will be trained every year. These sessions will be in line with advice from the CSCP (Cumbria Safeguarding Children partnership) and NSPCC.
- Each year all staff and volunteers are required to read and sign that they have read the following documents:
  - - Part 1 of the KCSIE (most current version) and Annex A
    - The Safeguarding – Child Protection Policy – special attention to be paid to the following within this document:
      - Safeguarding response to children who go missing from education
      - The role and identities of the DSLs
    - The Staff Code of Conduct
    - The Promotion of Good Behaviour Policy
- New staff will also receive online safety advice.
- Temporary staff and volunteers will all be given a briefing by one of the DSLs.
- Key pastoral staff including the safeguarding governor will receive Level 3 safeguarding training.
- Child Protection Training will be given to the Governing Body annually and for new governors as they join the Board.

The most up to date basic safeguarding training PowerPoint is available to all from the School office.

In line with the KCSIE (September 2020) updates are distributed to all staff either in the form of a newsletter or through staff briefings. Topics covered in these include Prevent, Online Safety and other pertinent thematics outlined within the KCSIE 2020 and other Safeguarding documentation.

## 9. Arrangements for reviewing policy and procedures

Any weaknesses or deficiencies highlighted in the day to day usage of this policy will be remedied without delay. The DSLs will present to the Head the issues encountered and the policy and procedures will be amended promptly, and communicated to staff and Governing Body.

The DSLs will present the policy to the Governing Body on an annual basis, following a review in line with ISI recommendations by the Designated Persons. In this session a report will also be given to the board to review the previous 12 months with regard to Child Protection.

Minutes of the review must be sufficiently detailed to demonstrate the depth of the review.

The Governing Body will also ensure that the school contributes to interagency working in line with *Working together to Safeguard Children Feb 2019* through effective implementation of the Safeguarding – Child Protection Policy and procedures, and good co-operation with local agencies.

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

## **10. Safer recruitment procedures**

Windermere School follows the Government's recommendations for the safer recruitment and employment of staff who work with children. In line with The School Staffing Regulations 2009 at least one of the persons conducting an interview will have completed the appropriate safer recruitment training.

Detailed information about the whole recruitment process and the measures put in place to ensure Safer Recruitment are all contained in the Recruitment Policy.

### **10.1 Employing a New member of Staff**

The definition of staff is: *Any person working at the school whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.* The following are included as staff: teachers, peripatetic teachers and coaches, part-time staff, gap students, administrative staff, caretakers and other ancillary staff, staff appointed from overseas, pupils paid to work at the school.

Several categories of people fall outside the main regulations concerning appointment but the School pays regard to KCSIE and will carry out the appropriate checks for this category of people. The main groups are as follows:

#### **10.1.1 Staff involved in non-regulated activities**

- Staff who come on site on an infrequent basis and therefore do not meet the definition of regulated activity, for example, occasional sports coaches etc. The School will ensure these people are supervised by suitably checked school staff and a fully documented risk assessment will be in place before such an individual works alongside pupils of the School.
- For such individuals the School may decide to undertake checks to be assured of the person's suitability and the School will always carry out identity checks on arrival.

#### **10.1.2 Volunteers**

- The arrangements for volunteers will vary by activity and individual.
- The School will carry out checks on an individual involved in a regulated activity. Volunteers involved in a non-regulated activity will be supervised by a suitably checked school member of staff and this supervision will mean the volunteer will never be alone with the pupils.
- For new volunteers in regulated activities the School must obtain an enhanced DBS certificate with a barred list check.
- For existing volunteers who provide personal care the School will obtain an enhanced DBS certificate with a barred list check.
- For other existing volunteers who are unsupervised the School may choose to request another DBS check with a barred list check if they have any concerns.
- For existing volunteers in non-regulated activities the School is not required to request an enhanced DBS check but if the school has any concerns they will request this check but they are NOT permitted to request a check of the barred list.
- The School will consider the following items when deciding on whether they should seek an enhanced DBS check for a volunteer who is not engaging in a regulated activity:
  - The nature of the work with children
  - What the School knows about the volunteer
  - Whether the volunteer has other employment or volunteers elsewhere where referees can advise on suitability
  - Whether the role is eligible for an enhanced DBS check.

#### **10.1.3 Protection of Freedoms Act 2012**

- The guidance issued following the amendment to Safeguarding Vulnerable Groups Act 2006 which removed supervised volunteers from regulated activities requires that for volunteers who need to be supervised because they are undertaking an activity which is regulated:
  - There must be supervision by a person who is in a regulated activity
  - The supervision must be regular and day to day
  - The supervision will be “reasonable in all the circumstances to ensure the protection of children”
- The School is not legally allowed to request a barred list check on a volunteer who, because they are supervised, is not in a regulated activity.

## 10.2 Employment Process

We obtain at least 2 references for all staff including those teaching in the Early Years Foundation Stage and enhanced criminal record checks through the Disclosure and Barring Services (DBS) for staff and volunteers who will have unsupervised access to children. This is in accordance with requirements under the Safeguarding Vulnerable Groups Act 2006.

Applicants for posts may be invited for interview where we follow the NSPCC's Children's Workforce Development Council – CWDC, Safer Recruitment Guidance Procedures.

We keep all records relating to employment of staff and volunteers, in particular those demonstrating that checks have been done, including the date and number of the enhanced DBS (Disclosure and Barring Service) check. Including the DBS Update Service.

Before using the Update Service, the School will:

- Obtain consent from the applicant to do so
- Confirm the certificate matches the individual's identity
- Examine the original certificate to ensure it is for the appropriate workforce and level of check

All members of the teaching and non-teaching staff at the School, including part-time staff, temporary, supply staff, and visiting staff, such as musicians and sports coaches, are checked with the Disclosure and Barring Service (DBS) and are seen to be in compliance with the Independent School Standards Regulations (ISSR) before starting work at Windermere School.

If it is deemed necessary for an individual to start work in a regulated activity before the DBS certificate is available, the situation will be risk assessed and the individual will be appropriately supervised at all times. In these rare circumstances all other checks, including a separate barred list check, will have been completed.

All Governors, volunteer helpers, contractors working regularly during term-time, such as contract catering staff, [and adult members of the families of members of staff who live on site] are also vetted.

All governors are required to have an enhanced criminal record certificate from the DBS, in line with the KCSIE (September 2020) recommendations that the School will also contact the Teaching Regulation Agency (TRA) to check if the person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction.

Section 128 of the Education and Skills Act 2008 prohibits an individual from taking part in the management or governance of an independent school, with this in mind all managers and governors will be checked against this act before commencing in role.

The School informs Ofsted of any changes in the person managing our Early Years Foundation Stage provision.

## 10.3 Procedures for Trainee/Student Teachers

We require students on qualification courses to meet the 'suitable person' requirements of Ofsted and have DBS checks carried out.

We require students to keep to our school procedures on confidentiality.

Students meet with the Head, Head of Elleray Campus, prior to starting their first placement session.

The Student Liaison member of Staff for the Elleray Campus is: Mrs J King (Head of Elleray Campus)  
The Student Liaison member of Staff for the Senior School is Mrs E Vermeulen (Deputy Head Academic)

## **11. Effective implementation of the policy**

### **11.1 Transparency**

Windermere School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting Windermere School. A copy of this policy is on our website, and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the School. We will never ignore an allegation of child abuse and will always deal with any concerns appropriately. Open communications are essential.

### **11.2 Raising awareness with pupils**

Windermere School prides itself on its culture of open and effective communication between staff and pupils, and on its excellent pastoral support structures. We prepare all of our pupils to make reasoned, informed choices, judgements and decisions. Time is allocated in Life Skills for discussion of what pupils should deem as appropriate behaviour from the adults in their lives, developing the confidence that they require to recognise abuse and to stay safe. Emphasis is put on awareness of on-line safety with all key stages. The material taught will be relevant to the ages of pupils but will also take into account what is topical and what the children are experiencing. CEOPS is one of the resources used to guide planning of such sessions.

All pupils know that there are adults to whom they can turn if they are worried.

At Browhead Campus:

- All pupils have access to a telephone helpline, enabling them to call for support in private.
- Every child has a diary which contains guidance on where to turn for advice, including confidential help lines for external specialists; an independent listener, the School Doctors and Child Line.
- Our Medical Centre and all our boarding houses display advice on where pupils can seek help.

At Elleray Campus

- All children are informed about who they should talk to should they have any concerns or worries. Regular training is done through assemblies, group form sessions and Life Skills lessons.
- All children have a diary containing guidance on where to turn for external help.

### **11.3 Equal treatment**

Windermere School is committed to equal treatment for all, regardless of an individual's race, ethnicity, religion, sexual orientation or social background.

We aim to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each student.

## **12. Children Looked After**

Definition of 'Children Looked After' *Children and young people become 'looked after' if they have either been taken into care by the local authority, or have been accommodated by the local authority (a voluntary care arrangement). Most Children Looked After will be living in foster homes, but a smaller number may be in a children's home, living with a relative or even placed back home with their natural parent(s).*

Staff should be aware that both children looked after and previously children looked after will be vulnerable. The DSLs will share appropriate information with staff so that they can support such children in the most effective ways.

### **12.1 Principles**

The term 'children looked after' denotes a child's current legal status; this term is never used to categorise a child as standing out from others. We do not refer to such a child using acronyms such as LAC.

We do not offer places for babies and children under three years who are in care.

## 12.2 Procedures

The designated person for children looked after at Windermere School is the Designated Safeguarding Leads.

Every child is allocated a key worker before they start and this is no different for a child looked after. The designated person ensures the key worker has the information, support and training necessary to meet the looked after child's needs.

The designated person and the key worker liaise with agencies, professionals and practitioners involved with the child and his or her family and ensure appropriate information is gained and shared.

- The most common reason for children becoming looked after is as a result of abuse and/or neglect.
- Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe. In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility.
- They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead, through the designated teacher for looked after children, should have details of the child's social worker and name of the virtual School Head in the authority that looks after the child.

## 13. SEND Children

Staff must understand that children with SEND can face additional safeguarding challenges. 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 SEND can be disproportionately impacted by things like bullying without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.
- SEND children may be less able to protect themselves from abuse, including verbally and physically.

## 14. Peer on Peer Abuse

Bullying, harassment, victimisation or discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the School. Any kind of bullying is unacceptable.

- The different forms peer on peer abuse can take are:
  - Sexual violence and sexual harassment
  - Physical abuse
  - Sexting
  - Initiation/hazing violence and rituals
  - Upskirting
- Windermere School recognises that statistically it is more likely that girls will be victims and boys' perpetrators of peer on peer abuse but there will be situations where this is not the case.

Copies of the School's Anti-Bullying procedure is available on our website; a paper copy can be requested from the School Office.

## 15. Online Safety

The use of technology has become a significant component of many safeguarding issues and technology can often provide the platform which facilitates harm.

The number and range of issues classified within online safety are vast but the main areas of risk are as follows:

- Content: Being exposed to illegal, inappropriate or harmful material
- Contact: Being subjected to harmful online interaction with other users.
- Conduct: Personal online behaviour that causes harm or increases the likelihood of harm.
- Exposure to unwanted and illegal behaviours, such as access to the purchase on illegal substances through online platforms.

To keep the pupils of Windermere School aware of the dangers and to encourage a no blame culture where all members of the community discuss openly their experiences online, a separate Online Safety Policy and accompanying AUPs have been created. These have been created after using “360° Safe”, a recommended safety self-review tool.

DfE guidance outlines how schools can ensure pupils understand how to stay safe and behave online, Windermere School use this guidance to inform their curriculum. [Teaching online safety in school](#)

An online safety group meets termly (more frequently if necessary) to discuss issues and developments so ensure we both protect and educate our pupils preparing them for the challenges online outside the protective environment of the School.

More detailed information about Online Safety at Windermere School can be found in Safeguarding – Online Safety Policy 3.7ai vs 20.1

## **16. Mobile Phones and Cameras**

For general School advice regarding the use of images of children in an educational setting please refer to the Online Safety Policy 3.7ai vs 20.1.

### **16.1 EYFS considerations for Mobile Phones and Cameras**

Specific to the EYFS setting:

- Extra care must be taken when considering the role of photography and mobile phones with these pupils.
- Cameras and mobile phones are prohibited in the toilet or nappy changing areas of EYFS classrooms.
- Visitors, volunteers and students are not permitted to use their own mobile phones to take or record any images of EYFS pupils at any time.
- Check parents/carers have given permission through the Consent Form (appendix 1). Staff should note that a list of students without Media Consent will be kept centrally in the School Office at both the Senior School and Elleray Campus sites. It is each member of staff’s responsibility to check this list if they intend to use any images of students.
- Ensure all students are appropriately dressed.
- Avoid photographs that only show a single child with no surrounding context of what they are learning or doing unless this is used for items such as SIMS database, classroom labelling or reports. A photograph for identification purposes may endure for several years but should not be retained when replaced or expired.

## **17. Complaints**

We hope that you and your child do not have any complaints about our School; but copies of the School’s complaints procedure can be found on the School website: <https://www.windermereschool.co.uk>. This can be found under the section: Further Information // Policy Information // Compliance Policies // Policy Number 7.33a Complaints Procedure.

## **18. Response to Allegations**

### **18.1 Specific to EYFS**

As a registered EYFS establishment, Windermere School has a responsibility to report any allegations against people living or working at the School or other abuse alleged to have taken place on the premises to Ofsted within 14 days of awareness of an incident.

The Ofsted Safeguarding hotline can be contacted in three ways.

- Call 0300 123 3155 (Monday to Friday from 8.00am to 6.00pm).
- Email at [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk).
- Write to: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD

### **18.2 Specific to Boarding**

Under National Minimum Standard 3, Windermere School will make alternative arrangements for the accommodation of students or staff in the boarding houses if a disclosure or an allegation means that it is the best course of action to make all parties safe and secure.

Compiled		January 2008	J Parry
Approved		January 2008	A Graham
Reviewed		December 2009	J Parry
Reviewed		December 2010	J Parry
Revised	Version 4	April 2011	J Parry
Approved		May 2011	I A Lavender
Approved		May 2011	B Freeman
Revised (EYFS)		January 2012	R Thomas
Approved		January 2012	B Freeman
Revised		March 2012	I A Lavender
Approved		March 2012	I A Lavender
Revised	Version 5	May 2012	R Thomas
Approved		June 2012	I A Lavender
Revised	Version 5.1	December 2012	J Parry
Revised	Version 5.2	January 2013	J Parry
Approved		January 2013	I A Lavender
Revised	Version 5.3 EYFS	February 2013	R Thomas
Revised		March 2013	J Parry
Approved		March 2013	I A Lavender
Revised	Version 7.0	Oct 2013	J Parry/ R Thomas
Revised (EYFS)		Oct 2013	J Davies
Revised (New arrangements from CCC LSCB)	Version 7.1 (Draft)	March 2014	J Parry
Approved	Version 7.1	April 2014	I A Lavender/ J Harris
Revised new arrangements from DfE KCSIE (April 2014)	Version 7.2 (Draft)	May 2014	J Parry/R Thomas/ J Davies

Approved Governors	Version 7.2	May 2014	J Harris (CP Governor) M Dwan (Chairman)
Approved	Version 7.2	June 2014	I A Lavender
Checked (Sept 2014)	Version 8	September 2014	J Parry
Revised in line with advice from ISI (Jan 2015)	Version 8.1	January 2015	J Parry
Revised	Version 8.2	May 2015	J Harris/M Dwan
Revised	Version 9	September 2015	J Parry
Revised and Approved by Governors	Version 9.1	May 2016	J Harris/M Dwan
Revised in line with KCSIE (Sept 2016) and ISI Safeguarding Policy Check	Version 10 (Draft)	September 2016	J Parry / J Davies
Approved	Version 10	September 2016	I A Lavender
Revised and reviewed in line with new ISI regulations	Version 16.1	January 2017	J Parry / J Davies
Approved	Version 16.1	January 2017	I A Lavender
Revised	Version 16.1	May 2017	J Harris (Safeguarding Governor)
Approved	Version 16.1	May 2017	M Dwan (Chair) and Governors
Reviewed and updated to Version 17 for Academic Year 2017-2018	Version 16.1	August 2017	J Parry / J Davies
Revised	Version 17	August 2017	J Parry / J Davies

Reviewed and updated in line with KCSIE 2018 (Draft Version awaiting approval)	Version 18	July 2018	J Parry
Approved	Version 18	September 2018	I A Lavender
Approved	Version 18	September 2018	M Dwan (Chair) and Governing body
Reviewed	Version 18.1	January 2019	J Parry/J Davies
Reviewed	Version 18.2	May 2019	J Parry/J Davies
Approved	Version 18.2	May 2019	I A Lavender
Approved	Version 18.2	10 May 2019	A Chamberlain (Chair) and Governing body
Reviewed and updated to version 19 in line with KCSIE 2019	Version 19	July 2019	J Parry/J Davies
Amended following advice from ISI	Version 19.1	January 2020	J Parry/J Davies
Reviewed and updated to version 20 in line with the KCSIE September 2020	Version 20	July 2020	J Davies
Reviewed and updated to version 20 in line with the KCSIE September 2020	Version 20.1	September 2020	I A Lavender
Reviewed and updated to version 20 in line with the KCSIE September 2020	Version 20.1	September 2020	A Chamberlain (Chair) and Governing body
Amended	Version 20.2	October 2020	J Davies
Amended in light of new Safeguarding Governor	Version 20.3	March 2021	J Davies
Amended in light of updated Government legislation and helpine	Version 20.4	April 2021	J Davies/S Brown
Approved	Version 20.4	April 2021	I Lavender/ S Hamilton



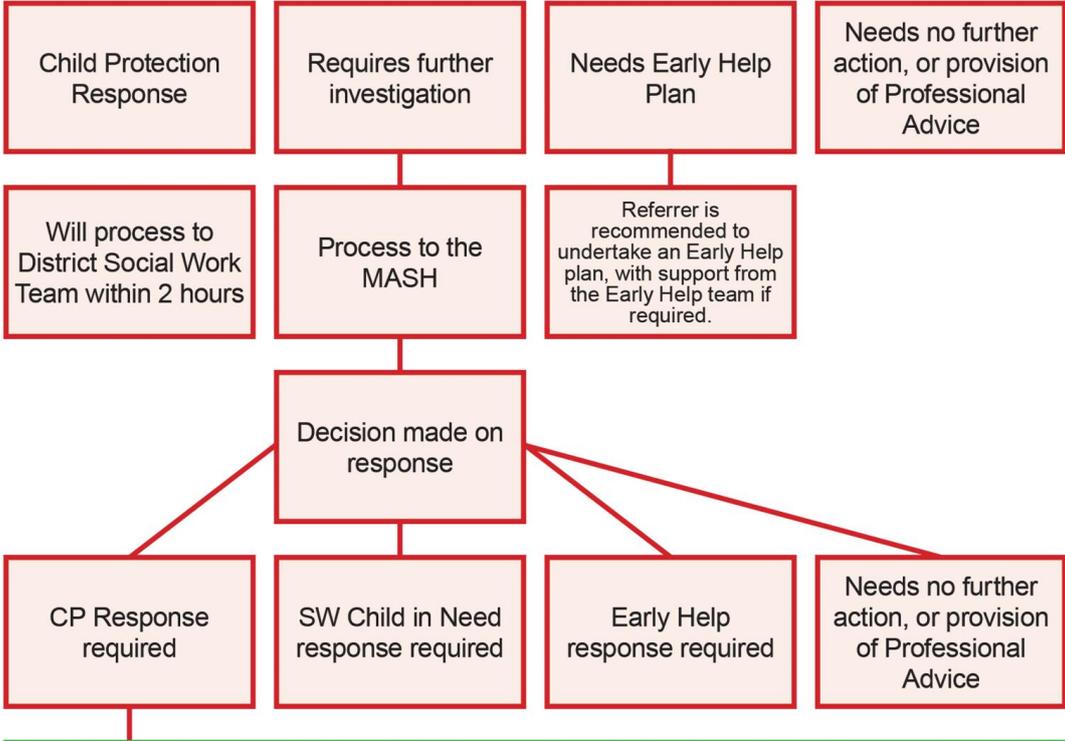
## Contacting Cumbria Safeguarding Hub

### Consider

Does this child need an immediate child protection response if so continue to report your concern to the Hub. **IF NOT:**

- Could this child be helped by an Early Help Plan?
- Can I identify other professionals to contribute to an Early Help Plan ?
- If so please seek support from your own service advisor or the Early Help Team to work with the family to prevent escalation of need.

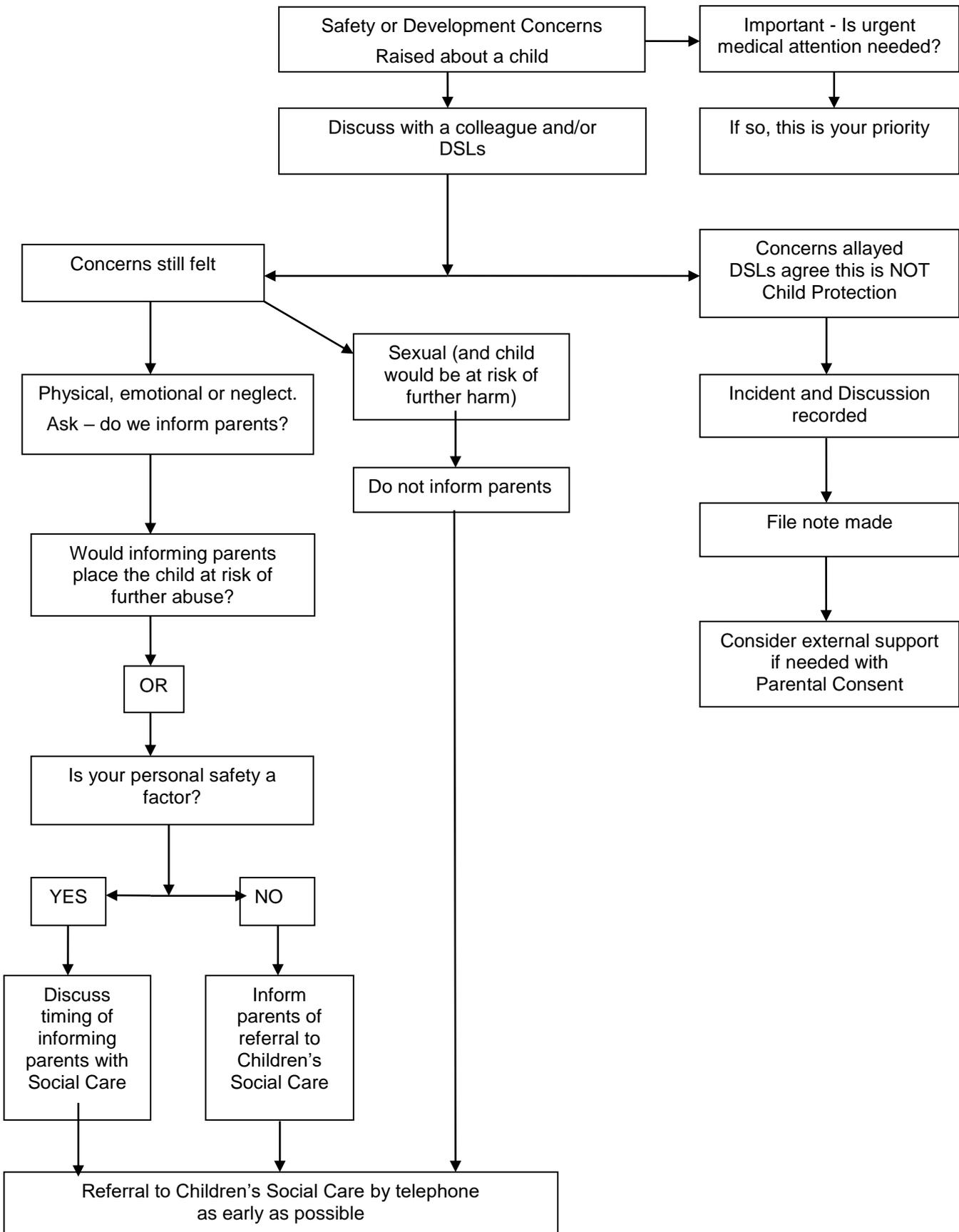
Unless your contact requires an immediate child protection response the Hub will ask you about the recent Early Help Plan and Team around the child meetings and will make a decision about the level of vulnerability. This will be either:



We trust you will be part of an agreed outcome in line with the Cumbria Threshold Guidance. Where decision have been made following the Hub episode we will provide feedback on the destination of your contact via email or letter. However you are also responsible for knowing what has happened to your concern, so if you have not had any feedback within 72hrs you MUST contact the Hub and ask.



This chart is to show Staff, Parents and Carers how information about a child will be dealt with by Windermere School.



## Appendix 3

### DISCLOSURES AND DISCUSSIONS – ADVICE TO STAFF

- All staff are trained at every year in Safeguarding - Child Protection protocol. During the sessions staff are given guidance to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil.
  - Situations to be aware of are those when staff are alone with a student. Staff are advised to not be alone with a student unless absolutely necessary, and if they are alone, to ensure that the door is wedged open or has a glass panel, and that another member of staff knows they are alone. This advice does not apply to the School Nurses when in consultation with a child who is entitled to privacy and confidentiality.
  - Staff in a car with a student are advised to ask the student to sit in the back.
  - Staff are required not to: e-mail students on their personal accounts; engage in communication through social networking sites; or text students from their own mobile phones.
  - Staff are asked to sign that they have read the Safeguarding policy and training has been given.
  - If Staff are considering one to one tuition they should discuss this with the Deputy Head (Pastoral) for appropriate advice.
- Staff must note that they cannot ever promise confidentiality to a student who wants to tell them something.
- When a child discloses something, the staff member must inform them that they will have to take this to one of the DSLs.
- Staff are advised never to ask leading questions; an appropriate question may be, “do you want to tell me anything else?”.
- If a child discloses abuse by one or more pupils against another pupil, it must be reported immediately to the DSLs, and arrangements will be made to keep all the students involved safe.
- If a disclosure is made or there is a suspicion of abuse the DSLs will be informed and all the evidence will be noted carefully and stored securely. The disclosure will be reported and then a referral made within 24 hours normally to Cumbria Safeguarding Children Partnership (CSCP) and the agencies will work together from that point forward.
- Windermere School is required to report to the Disclosure and Barring Service (DBS), within one month of leaving the school, any person (whether, employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children.  
 Disclosure and Barring Service (DBS)  
 PO Box 3963  
 Royal Wootton Bassett  
 SN4 4HH  
 Tel 03000200190



## **Appendix 4 – Useful Documentation and websites**

[Keeping Children Safe in Education September 2020](#)

[What to Do if you are Worried a Child is Being Abused - Advice for practitioners](#)

[Working Together to Safeguard Children July 2018](#)

[Cumbria Safeguarding Children Partnership](#)

[NSPCC Help and Advice](#)

[NPCC - When to Call the Police. Child Centred Policing](#)

## Appendix 5 Child Protection and Exchanges



### Windermere School – Exchanges and keeping our students safe

Following a meeting to review child protection across the School and the opportunities offered to our students which might not fall under the normal checks for safeguarding it was decided to look in detail at our exchange programme.

Exchanges are offered through our membership of the Round Square organisation. With strong relationships between the schools in this organisation Windermere School has sent Year 9 students on exchange around the world to other member schools for many years.

Different countries have different approaches to safeguarding and with no worldwide system to check that children who travel are kept safe, we need to put in our own system which will ensure that we can satisfy ourselves and our parents that their children will be well cared for whilst they are away from home.

This document has used the advice from the Round Square Organisation to suggest a set of guidelines when it comes to exchanges.

### Assessing Risk

Best practice suggests that all parties involved in exchange are involved in the Risk Assessment process. The intention is to keep the risk of harm to a student to the minimum possible level. Not all countries have the equivalent of DBS checks and this means that other questions must be asked by the School when choosing a student to partake in the exchange programme.

The Round Square organisation suggests the following questions are asked:

- Are the two families carefully matched?
- Are the host family known well by the school and can the school confirm that they consider this family suitable?
- Is there a hosting agreement form which includes questions about criminal convictions etc?
- If it was felt that a student needed to be moved at short notice has the school contingency plans in place?
- Has travel been considered and have questions been asked about who will drive a student when they are with the host family and is that person safe to drive?
- Is there a 24-hour contact number to call should there be a problem and has everyone involved been fully briefed on procedures should a problem arise?
- Will students have access to a phone to either call or text at any time, if necessary?
- Have all exchange students been briefed about personal safety and have written guidance about what to do?
- Have there been conversations between exchange families about the sorts of activities that they are happy to allow their children to be involved in and has concern been given for any risk activities such as horse riding, swimming, skiing etc?

### DBS Checks

- The DfE states that any group leaders need to be clear about the relevant procedures for vetting the suitability of host families including DBS checks when they are available. This means that any families from Windermere School hosting exchange students will require a DBS check plus anyone over 16 staying in their household. Windermere School will facilitate these checks but will need to consider who pays for this service.

- Although the exact equivalent of DBS checks is unavailable in all countries, Windermere School will ensure the host school has some sort of vetting procedure in place to assess the suitability of home placements.

### **Responsibility of Windermere School and partner exchange school**

- To liaise fully and carefully with the partner school to discuss each child in detail.
- To ensure students have written guidance on personal safety and have been briefed about what to do if they feel uncomfortable or worried in any way.
- To ensure students have the means to contact a member of staff at any time to express their concerns.
- To meet with families to talk through acceptable and unacceptable activities whilst a student is on exchange.
- To DBS check families who are hosting exchange students.
- To use a hosting agreement form to ensure that all families are suitable for the exchange programme.
- To carry out home checks similar to those employed when evaluating guardians on all Windermere School host families.
- To liaise with the partner school whilst the exchange is in progress to check every child is happy and well cared for.

### **Responsibility of Parents**

- To complete all the requested documentation, including medical details.
- To ensure your son/daughter fully understands his/her responsibilities while abroad.
- To know who to contact if there is an emergency.
- To have a complete itinerary and timetable of the visit and understand the purpose of the visit?
- To know of all the activities your son/daughter will participate in and have given consent.
- To ensure that you believe your son/daughter is fully prepared to participate in the trip.
- To make every effort to attend the parents' meeting put on by Windermere School concerning exchanges.
- As parent/guardian to be contactable throughout the duration of the visit and when necessary be available to support the child and both schools.
- To ensure your son/daughter fully understands his/her responsibilities while abroad.

### **Responsibility of Exchange Students**

- Before you leave find out about your host family and if possible have a video call conversation with them.
- Make sure you know the address and telephone number of where you will be staying.
- Give your parents/guardian all the relevant information.
- Ensure you have a valid passport and a photocopy of the relevant pages.
- Ensure you know the 24-hour emergency contact number for the Round Square representative at your exchange school and also the rep at home in case of a problem.
- Do you know how to alert the Round Square Rep if you are not happy?
- Do you know who will be responsible for you on the journey?
- Do you know who will be responsible for you on the visit?
- Do you know what to do if you get lost?
- Do you know of any legal and cultural differences or sensitivities of the countries you are visiting?
- Do you understand all necessary road safety issues?
- Do you know what is expected of you with regards to your behaviour?

## Host Families

This section may require translation into the host language.

- Please supply the relevant information to the school to provide assurances as to your suitability to act as a host household and agree to any necessary but confidential checks being completed.
- Complete and return the host family form which includes details of other family members.
- Ensure you have received details of your guest/s which includes their diet, any medical concerns, any learning difficulties, and religious or cultural issues and any parental concerns.
- Please ensure you have been informed about 24-hour emergency contact details and who to contact regarding any routine problems.
- Be aware of suitable/unsuitable activities for family days/leisure time and have the consent of both the parents of your guest and the group leader should any 'higher risk' activities be considered.
- Be aware of the dates, duration and itinerary for the visit.
- Host families should be made aware of any pre-existing medical conditions of the visiting student.

## Appendix 6 Child Protection and Guardianship



### Windermere School – Guardianship and keeping our students safe

Due to the international nature of Windermere School it was felt necessary that we introduced our own Guardianship Scheme for students who needed accommodation during the holidays when it was impractical to fly home.

It is crucial, with a Guardianship provision being offered through Windermere School, that as a school we ensure that all of our students who use this scheme are safe and happy during their time with a guardian. In terms of child protection, we need to be confident that the Guardians we provide for this service are suitable for the role and realise the importance of safeguarding our students' welfare at all times.

The Guardianship arrangements have been reviewed in line with the BSA and their Boarding Briefing paper "Educational Guardians – May 2013" produced with Veale Wasborough plus ISI requirements.

Common pitfalls to be considered:

- No pupil under 18 is in school appointed accommodation for more than 295 days each year.
- No organisation other than school accommodates a child for more than 27 consecutive days (over 27 days means they become private foster parents)

### Assessing Risk

The following Procedures have now been put in place:

#### Checks

- The same checks and procedures should be followed for guardians and all adults in the household as for any school member of staff.

#### Training

- All guardians should have the same child protection training as the school staff team. There must be a written agreement with the educational guardian which requires them to safeguard and promote the pupils' welfare.
- The guardians must be supported by school (induction training, mentoring and written guidance) with the necessary information about the pupils and a 24-hour emergency contact number.
- It is advisable that guardians have a basic level of First Aid training.

### Assessing Suitability

- The house must be visited and checked for suitability with a list of requirements.
- The educational guardian must be interviewed to assess suitability and adherence to necessary school policies. Written references must be taken up and a written assessment of the guardian must be produced before a child is placed.

### Reviewing Level of Care

- Every pupil placed must be interviewed about their guardianship arrangements every term after their stay. The school must act upon any concerns immediately.
- Each educational guardian must be revisited each year, accommodation rechecked and a written record made of this review.

### Pupils

- To ensure the best experience for each pupil a sheet of information on each pupil will be produced and sent to the guardian prior to their stay. It is the responsibility of the HoM, HoS and tutor to ensure that this form contains all the information needed for the pupil to have a comfortable stay.
- All students using this scheme will be given a 24-hour emergency contact number.