



WINDERMERE
SCHOOL
FOUNDED 1863

Safeguarding Policy

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

Safeguarding and promoting the welfare of children is defined as:

- *Providing help and support to meet the needs of children as soon as problems emerge;*
- *Protecting children from maltreatment, whether that is within or outside the home, including online, preventing the impairment of children's mental and physical health or development;*
- *Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and*
- *Taking action to enable all children to have the best outcomes.*

Windermere School Safeguarding Policy

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

Review Date: August 2026

Reviewed by: SLT and Governors

Review Period: 12 months (and ongoing)

Staff Responsibility: Head of Safeguarding and Wellbeing

Contents

Windermere School’s Commitment to Safeguarding	6
General Principles	6
Arrangements for Promoting the Welfare of Children	7
Key Information - Child Protection at Windermere School (Policy Basics and Oversight)	7
Policy Basics:	7
Designated Safeguarding Leads	8
The role of the Designated Safeguarding Lead (DSL).....	10
DSL Availability.....	11
DSL Accountability	11
Arrangements for reviewing the safeguarding policy / the School’s safeguarding procedures	11
Governor Oversight.....	11
Prevention of Child Abuse	12
Staffing Ratios	12
EYFS Staffing Ratios.....	13
Contextual Safeguarding.....	13
Minimising risk	14
Concerns About a Child.....	14
Windermere School - An Individual Approach.....	14
Specific Issues	16
Unsubstantiated, unfounded, false or malicious reports	16
Training of staff.....	16
Induction of new staff.....	17
Online Safety.....	17
EYFS considerations for Mobile Phones and Cameras.....	19
Whole School considerations regarding Mobile Phones and Cameras	19
SEND Children	19
Mental Health	Error! Bookmark not defined.
Systems and processes for identifying possible mental health problems.....	20
Mental Health - routes to referral	20
Pupils who are lesbian, gay, bisexual or gender questioning	20
Child abuse, neglect and exploitation.....	20
Definitions of types of abuse, neglect and exploitation.	20
Types of abuse	21
Indicators of Abuse – Signs and Symptoms	22

Indicators of Physical Abuse (Injury).....	23
Indicators of Sexual Abuse.....	25
Indicators of Neglect.....	26
Indicators of Emotional Abuse.....	27
Serious Crime and/or Violence.....	27
Risk Factors - All Forms of Abuse, neglect and exploitation.....	27
Additional forms of abuse, neglect and exploitation to be aware of:.....	28
Child-on-Child Abuse.....	38
Procedures to minimise the risk of child-on-child abuse.....	39
Reporting safeguarding concerns, including child-on-child abuse concerns.....	40
Risk Assessment.....	41
Action Following a Disclosure.....	41
Children Sharing Classrooms.....	41
Options Following a Disclosure.....	42
Ongoing support.....	44
Making A Referral.....	45
Allegations against Staff.....	46
The harm threshold.....	46
Reporting Allegations.....	48
Malicious allegations against staff.....	49
Low level concerns and allegations.....	49
Responding to a low-level concern.....	49
Staff Code of Conduct.....	50
Abuse of Trust.....	50
Physical Contact with Children.....	50
Recruitment Procedure.....	51
Safer recruitment procedures.....	51
Employing a new member of Staff.....	51
Employment Process.....	52
Procedures for Trainee/Student Teachers.....	54
Effective implementation of the safeguarding policy.....	54
Transparency.....	54
Raising awareness with pupils.....	54
Equal treatment.....	55
Looked After Children.....	55

Use of the School premises for non-school activities.....	56
Complaints	56
Information Sharing	56
Appendix 1 – Contacting Cumbria Safeguarding Hub.....	58
Appendix 2 – Child Protection Process – Parental Involvement.....	59
Appendix 3 – Disclosures and Discussions – Advice to Staff	60
Appendix 4 – Useful Documentation and websites.....	61
Appendix 5 – Child Protection and Exchanges.....	62
Windermere School – Exchanges and keeping our pupils safe	62
Assessing Risk.....	62
DBS Checks.....	63
Responsibility of Windermere School and partner exchange school	63
Responsibility of Parents.....	63
Responsibility of Exchange Pupils	63
Host Families.....	64
Appendix 6 – Guardianship and keeping our pupils safe.....	65
Appendix 7 – DSL Responsibilities	66
Appendix 8 – Tracking document amendments.....	69

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 is their main priority. This includes children aged three to 11, who are in Prep or Pre-prep (referred to hereafter as Prep School). For the purpose of this policy, children includes everyone under the age of 18. The School recognises that safeguarding and promoting the welfare of children and is everyone's responsibility. Everyone who comes into contact with children, young people 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 all individuals have a responsibility to inform the designated persons of concerns relating to safeguarding children. The designated persons 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 child can learn in safety. We expect respect, good manners and fair play to be shown by everyone so that every child can develop to their full potential and feel positive about themselves as an individual. All children should care for and support each other.

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.
- The Human Rights Act 1998 (HRA), states that children have a right to be free from inhuman or degrading treatment, the right to respect for private and family life, including a duty to protect an individual's physical and psychological integrity and a right to education. Being subjected to harassment, violence or abuse is a breach of these rights.
- Under the Equality Act (EA) 2010, the School may not unlawfully discriminate against a student because of their sex, race, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- 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.

- The School recognises that a whole school approach to preventative education is most effective in preparing children for modern day life and creates a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These values and standards are upheld and demonstrated through all aspects of school life and underpinned by the School's behavioural policy, through pastoral support and through education in line with the Life Skills programme.
- To provide a broad and balanced curriculum, the School will ensure that Safeguarding is taught to all children in an age-appropriate manner, delivered generally through the Life Skills programme and will include online safety.
This includes the teaching of relevant Relationships Education (RE) and Sex & Health Education (RSHE) topics; see the Windermere School PSHE and RE/RSHE Policy <https://www.windermereschool.co.uk/school-policies/>.
- The School has systems in place, which deter possible abusers and also manage effectively any allegations or concerns about abuse which arise.

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 (KCSIE).
- Working Together to Safeguard Children (last updated July 2023) (WT).
- Every Child Matters framework.
- The Prevent Duty (June 2024).
- Windermere School Attendance policy.

Key Information - Child Protection at Windermere School (Policy Basics and Oversight)

This policy is updated annually, or more frequently if required, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

Policy Basics:

If you suspect a child is being abused, neglected or exploited:

- **INFORM** one of the DSLs
- Together with the DSL, **RECORD any DATES and facts**

If 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
- Together with the DSL, **RECORD any DATES and facts**

If you receive an allegation about a member of staff:

- **IMMEDIATELY INFORM the HEAD**
- Together with the Head, **RECORD any DATES and FACTS**

Designated Safeguarding Leads

Susan Brown (Designated Safeguarding Lead – DSL, Safeguarding and Wellbeing)

sbrown@windermerschool.co.uk

015394 46164, ext. 290

Lynn Moses (Designated Safeguarding Lead – DSL, Deputy Head)

lmoses@windermerschool.co.uk

015394 46164, ext.279

Jo Pink (Designated Safeguarding Lead, Prep School (Early Years))

jpink@windermerschool.co.uk

015394 43308, ext. 306

Head

Frank Thompson

ftompson@windermerschool.co.uk

Head – Prep School

Jenny Davies

jdavies@windermerschool.co.uk

Chair of Governors

Peter Hogan

chairman@windermerschool.co.uk

Governor with oversight of safeguarding

Peter Hogan

chairman@windermerschool.co.uk

Cumbria Safeguarding Children Partnership (CSCP)

This replaces the Cumbria LSCB (Local Safeguarding Children Board) and is made up of the Local Authority, the Police Service and the NHS to allow a multi-agency approach.

To contact the CSCP, telephone: 0333 240 1727

Contact details for children's social care

Children in Need and Children at Risk – Advice can be obtained from: [Cumbria Safeguarding Children Partnership](#)

The Triage Team telephone: 0333 240 1727, for advice or to make a referral.

Please note it is Windermere School's policy to discuss any concerns with one of the DSLs or the Head before contacting the CSCP.

Contact details for the LADO. If you have a concern about the behavior of a member of staff and feel that there may be risk/harm happening to a child, you should talk directly to the Head; together you may decide that the LADO needs to be contacted.

This is for allegations against staff members

Go to the Cumbria CSCP website to access the appropriate forms.

<https://cumbriasafeguardingchildren.co.uk/LSCB/professionals/lado.asp>

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 \(Doc 92KB\)](#)

Send completed forms to the Cumbria Safeguarding Hub, using any of the following methods. (Please note: if sending by email, it is advised that the document should be password protected)

[How to password protect a document](#)^[2]

- Tel: 03003 033892
- Fax: 01768 812090
- Email: 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** or see [How to refer a child](#)

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**

How to get advice and support about extremism

In any cases when you feel you need advice regarding extremism you should:

- Talk with one of the DSLs or the Head
- Together you may decide to contact the local police on 101
- Department for Education Helpline to support schools with advice and guidance about extremism.
<https://www.saferinternet.org.uk/blog/extremism-schools-helpline-teachers> Telephone: 020 7340 7264.
- Preventing extremism in schools and children's services
Email: counter.extremism@education.gov.uk

Contact Details for reporting FGM

- FGM (Female Genital Mutilation) is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- There is a legal obligation for staff 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.

- School staff **must** 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.
- The duty does not apply to risk or suspected cases, and school staff should follow the safeguarding procedures.

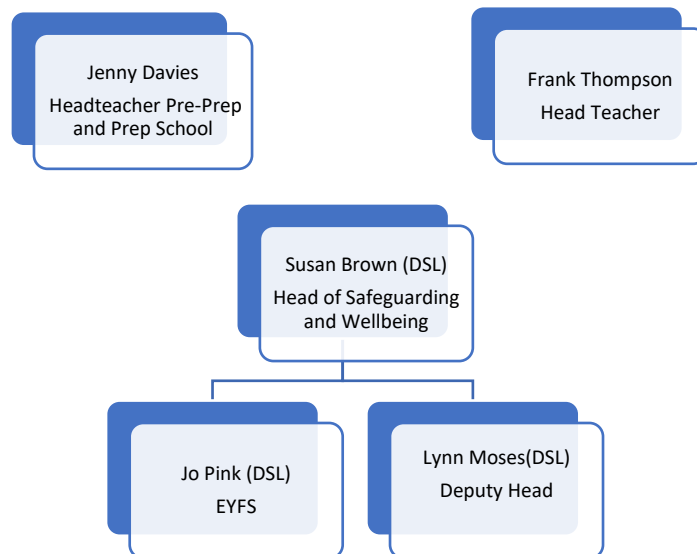
IN ALL SITUATIONS YOU MUST **REFER**. YOU MUST NOT INVESTIGATE.

IF YOU FEEL YOU NEED TO RING CUMBRIA SAFEGUARDING CHILDREN PARTNERSHIP DIRECTLY, PLEASE CALL: CSCP Cumbria Safeguarding Hub: 0333 240 1721

The role of the Designated Safeguarding Lead (DSL)

Windermere School Governing body will ensure that an appropriate member of the Windermere School Senior leadership team is appointed to the role of DSL/Head of Safeguarding. This person holds overall responsibility for safeguarding and this is explicit in their job description. This includes online safety, and understanding the filtering and monitoring process.

In order to ensure sufficient DSL cover, additional staff have completed the DSL training. The DSL structure below the Governor level is shown below:



The role of DSL carries a significant level of responsibility, and the people with that role will be afforded time, funding, training opportunities, resources and support required to effectively carry out their role. Additional responsibilities include:

- Providing advice and support to other staff on child welfare
- Safeguarding and child protection matters
- Involvement in strategy discussions and interagency meetings
- Contributing to the assessment of children
- Keep detailed, accurate, secure written records of all concerns, discussions and decisions made, including rationale for decisions. This includes instances where referrals were or were not made.

DSL 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 during School hours Monday to Friday. Outside these hours and at weekends a DSL will be available for advice and assistance. The DSL, when not in school, can be contacted via telephone or other media.
- During holiday periods, a system of Safeguarding advice will be available to the Windermere School community through the central office on 015394 46164 and through 'out of hours' messages. All staff will be encouraged to have an out-of-hours message that includes a link directly to the [Wellbeing](#) page of the Windermere School website, in particular during holidays, when emails are not being checked so regularly. This webpage includes signposting links, including Kooth, Childline and the NSPCC.
- 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.

DSL Accountability

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

Arrangements for reviewing the safeguarding policy / the School's safeguarding procedures

Any weaknesses or deficiencies highlighted in the day-to-day usage of this policy will be remedied without delay. The Head of Safeguarding will present to the Head any issues encountered, and the policy and school procedures will be amended promptly, and then communicated to staff and Governors.

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.

Governor Oversight

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.

The Governing body will receive safeguarding training, including online, at induction, and this training will be updated regularly.

The Governing body is aware of its obligations under the HRA (1998) and the EA (2010).

The Governors formally consider child protection issues once a year, with day-to-day issues being discussed between the Designated Safeguarding Leads (DSLs)

The policy is reviewed by the Governing body with advice taken from the DSLs, the Head and Safeguarding Governor. The Governors are responsible for:

- Reviewing the policy and procedures annually to ensure that:
 - Safeguarding underpins and is at the forefront of all school procedures and policies
 - The Safeguarding policy itself is fully up-to-date in light of changing regulations or recommended best practice.
- Ensuring that any deficiencies or weaknesses in safeguarding and child protection arrangements are remedied without delay.
- Where there has been a safeguarding concern, the school Governors are required to ensure that the child's wishes have been considered when determining actions taken and services provided.
- Ensuring that the School contributes to interagency working through effective implementation of the Safeguarding policy and procedures, and good co-operation with local agencies.
- Ensuring that appropriate online monitoring and filtering systems are in place, whilst being mindful that 'over-blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

The Head of Safeguarding will present the policy to the Governing Body annually, or when changes to policy are made. In this review session a report will also be given to the board to review the previous 12 months with regard to Safeguarding. Minutes of this review must be sufficiently detailed so they can clearly demonstrate the depth of the review.

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 that 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 Student Handbooks.
- 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.

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.

EYFS Staffing Ratios

Prep 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.

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 from 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.

Minimising risk

The 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 children.

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 DSLs. The Head will be informed by the DSL.

If a DSL is 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

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**.

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

- The Independent Listener – 0771276270
- The School Doctor – 01539488484
- [Childline](http://www.childline.gov.uk) Telephone: 0800 1111 (24 hours)
- [Kooth](http://www.kooth.com)
- [Papyrus](http://www.papyrus.org.uk)
- [NSPCC](http://www.nspcc.org.uk) Telephone: 080 8800 5000

For children 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**.

Windermere School - An Individual Approach

Bullying, harassment, victimisation or discrimination will not be tolerated. We treat all our children 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 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 children being in a residential environment, so 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 child-on-child abuse which is monitored extensively within boarding houses and throughout the school environment.

Staff at Windermere School must be aware that a child may not find it easy to directly make a disclosure, and may show signs or act in a way that they hope a staff member might notice. Staff must also be mindful of the fact that a child may not feel ready or know how to tell someone that they are being abused, exploited or neglected, or may not recognise that their experiences are abusive or harmful. Staff should also be mindful of the fact that children may feel embarrassed, humiliated or threatened and this could be due to various barriers, such as their vulnerability, disability, sexual orientation or language. These factors should not dissuade staff from having professional curiosity or speaking to the DSL about their concerns. The Pastoral team, working closely with the DSLs, 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.

The School has an awareness of the risks of cumulative harm: the accumulation of harms, incidents, experiences and episodes, that when considered together, represent more harm than a single incident, with the potential for more damage. Repeated incidents representing cumulative harm, can undermine a child's sense of safety, wellbeing and resilience.

The School acknowledges the Seasonal Safeguarding Framework, and accordingly adopts a seasonal mindset. We are alert to when certain risks are likely to appear or escalate, and considers plans to minimise harm.

As always, when concerned about the welfare of a child, all staff should act in the best interests of that 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 forward. Other children involved or impacted must also be considered in the pastoral care going forward.

All staff at the School should be able to reassure a victim that they are being taken seriously, that they will be supported and that they will be kept safe. A victim should never feel that by reporting abuse of any kind, they are creating a problem. No victim should be made to feel ashamed for making a report. Children should know that their concerns will be taken seriously. Staff should acknowledge that by downplaying any disclosure, there is a risk of normalising unacceptable behaviour.

Specific Issues

<p>The EYFS department, 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.</p> <p>The Ofsted Safeguarding hotline can be contacted in three ways:</p> <ol style="list-style-type: none">1. Call 0300 123 3155 (Monday to Friday, 8.00am to 6.00pm)2. Email at whistleblowing@ofsted.gov.uk3. Write to: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD	<p>As a boarding school, the School will make alternative arrangements for the accommodation of either children or staff from one of 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.</p>
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Unsubstantiated, unfounded, false or malicious reports

All reports will be made in writing and logged using My Concern software. Records will be reviewed to show potential signs of concerning, problematic or inappropriate behaviour, which can then be addressed. Should a disclosure be unsubstantiated, unfounded, false or malicious, the DSL should consider that the individual who made the allegation may need help and support, or may have been abused by someone else, and that this is a cry for help. In such circumstances, consideration for ongoing referral must be made.

The School will consider appropriate disciplinary action if a report is deliberately unfounded or malicious.

Training of staff

Safeguarding and 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 DSLs will be trained at least every two years in Advanced Safeguarding, Inter Agency working and Prevent.
- All staff will be trained every year. These sessions will be in line with advice from both the CSCP (Cumbria Safeguarding Children Partnership), the NSPCC and will include information on Prevent and online safety. Additionally, staff will be trained to ensure that children are taught about safeguarding, including online safety in an age-appropriate manner. Training will include:
 - How to manage a report of child-on-child sexual violence and sexual harassment;
 - To be aware of their role in the local early help process;
 - To be aware of the process for making referrals to children's social care;
 - To know what to do if a child tells them they are being abused, exploited or neglected; and
 - To reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

- Each year, all staff and volunteers are required to read and sign that they have read the following documents:
 - Part 1 of the KCSIE (the most current version) and Annex A/B as appropriate
 - The Windermere School Safeguarding Policy
 - The Windermere School Staff Handbook and the Staff Code of Conduct
 - The Promotion of Good Behaviour Policy
- In line with the KCSIE, safeguarding updates are distributed to all staff via email or staff briefings as and when they are required.
- Temporary staff and volunteers will all be given a briefing by one of the DSLs.
- Key pastoral staff including the safeguarding governor will receive DSL safeguarding training.
- All staff should manage their behaviour effectively to ensure a good and safe environment, with a clear understanding of the needs of all children. Teachers should have regard for the [Teachers' Standards](#).

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

Topics covered in this include Prevent, Online Safety and other pertinent themes outlined within the KCSIE and other Safeguarding documentation.

Induction of new staff

New staff will receive training before they start work (irrespective of training undertaken elsewhere), including access to electronic or paper copies of:

- the Safeguarding policy, which clarifies the DSLs and their roles.
- KCSIE part one or Annex A/B as appropriate.
- The Staff Handbook and the Staff Code of Conduct – these include information on whistleblowing, the acceptable use of IT, staff/child relationships, dealing with low-level concerns and acceptable use of social media.

The training of new staff will include:

- Who the DSLs are and what their role includes.
- Training on safeguarding, including the procedures for dealing with any concerns, including peer-on-peer abuse.
- Online safety. This includes an understanding of the filtering and monitoring system in place, alongside expectations, responsibilities and applicable roles in relation to this.
- Information on the behaviour policy, including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- The safeguarding response to children who go missing from education.

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.

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. Technology can be used to facilitate off-line abuse.

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; misinformation, disinformation (including fake news) and conspiracy theories
- **Contact:** Being subjected to harmful online interaction with other users;
- **Conduct:** Personal online behaviour that causes harm or increases the likelihood of harm;
- **Commerce:** Risks including online gambling, inappropriate advertising, phishing and financial scams.

To keep the children of the 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 Acceptable Use Policy (AUP) have been created. The Online Safety Policy acknowledges in more depth the 'Manosphere' and 'Incel' culture, and the associated safeguarding risks.

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

An online safety group meets termly (and more frequently when necessary) to discuss issues and developments to ensure we both protect and educate our children, preparing them for the challenges online outside the protective environment of the School. These meetings also review the effectiveness of the School's filtering and monitoring systems, and ensure that children's exposure to risk from the IT system is limited. These considerations are made with the Department of Education's [filtering and monitoring standards](#).

More detailed information about online safety, including the use of filters and monitoring of usage, can be found in the Windermere School Online Safety Policy - <https://www.windermereschool.co.uk/school-policies/>

Information on the use of mobile technology, including laptops and access to 3G/4G, is found within the Windermere School Device Policy: <https://www.windermereschool.co.uk/school-policies/>

Information on how children are kept safe when they are remote learning (e.g. during the Covid 19 pandemic) is contained within the Remote Learning Policy <https://www.windermereschool.co.uk/covid-19/>.

[Artificial Intelligence \(AI\) and Safeguarding](#).

The role of the DSL and Senior Leaders is to identify and respond to risk where children could come to harm through AI, and The School looks at the four steps of AI readiness:-

Developing Awareness: recognising AI as a safeguarding issue

Understand Risk:- Identify and naming AI related harms (ie deepfakes, sextortion).

Integration:-embedding AI and associated safeguarding threats into policies, training and procedures.

Leadership:- Ensure that School leadership embeds a culture that safeguards from AI risk.

The Department has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education <https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations>

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 children.
- Cameras and mobile phones are prohibited in the toilet and EYFS classrooms.
- Visitors, volunteers and children are not permitted to use their own mobile phones to take or record any images of EYFS children at any time.
- Check that parents/carers have given permission through the Consent Form. Staff should note that a list of children without Media Consent will be kept centrally in the School Office. It is each member of staff's responsibility to check this list if they intend to use any images of children.
- Ensure all children 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.

Whole School considerations regarding Mobile Phones and Cameras

Please see the staff code of conduct regarding use of personal devices in the School. Staff may not use personal devices to take images of school-based activities that include children.

SEND Children

Staff must understand that children with SEND can face additional safeguarding challenges and risks and that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's learning needs, without further exploration;
- Issues relating to potential communication barriers and difficulties in managing or reporting these challenges;
- Children with SEND needs can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with SEND or other medical conditions to be disproportionately impacted by behaviours such as bullying, without necessarily outwardly showing any signs;
- SEND children may be less able to protect themselves from abuse, including verbal and physical abuse.
- [Safeguarding children with special educational needs and disabilities \(SEND\)](#)

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. 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.

Mental Health

Systems and processes for identifying possible mental health problems

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

Mental Health - routes to referral

If staff have a mental health concern about a child, immediate action should be taken, starting with speaking to a DSL and following the procedures in this safeguarding policy. The DSL can then escalate the concern as appropriate.

Beyond internal structures, the School is able to access a range of advice to help identify children in need of extra mental health support, including working with external agencies.

The Mental Health Lead for the School is Mrs Susan Brown, supported by Mrs Jenny Davies and Ms Rachel Ambler as Mental Health Champions.

Pupils who are lesbian, gay, bisexual or gender questioning

This section of KCSIE remains under review, pending the outcome of the gender questioning children guidance consultation

The fact that a child may be lesbian, gay or bisexual is not an inherent risk factor for harm, but their sexuality or perceived sexuality may make them a target of child-on-child abuse. Inclusion is taught through the RSHE programme.

In order to reduce additional barriers faced by LGBT children in communicating their concerns, staff will ensure that they feel that it is safe to speak and confide worries and, where necessary, provide a trusted adult with whom they can speak.

Child abuse, neglect and exploitation.

Definitions of types of abuse, neglect and exploitation.

The NSPCC defines child abuse as **when a child is intentionally harmed by an adult or another child** – it can be over a period of time but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person or online. It can also be a lack of love, care and attention – this is neglect.

The list below is not exhaustive, but includes common forms of abuse. You may see other things in a child's behaviour or circumstances that concern you. A child may be experiencing abuse if they are:

- 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 does not 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.

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 by its parents/carers (or at risk of abuse) 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.

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

Types of abuse

Abuse is defined as:

A form of maltreatment of a child or young person. Someone may abuse or neglect a child or young person by inflicting harm, or by failing to prevent harm. Children or young people 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 young person, or children or young people. Ill treatment may not be physical but still cause harm, including witnessing ill treatment of others. This is relevant, for example, in all forms of domestic abuse, including where children see, hear or experience its ill effects.

Remember:

- Abuse is always wrong and it is never the young person's fault.
- 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.

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	<p>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:</p> <ul style="list-style-type: none"> • provide adequate food, clothing and shelter (including exclusion from home or abandonment); • protect a child from physical and emotional harm or danger; • ensure adequate supervision (including the use of inadequate care-givers); • ensure access to appropriate medical care or treatment. <p>It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p>

Indicators of Abuse – Signs and Symptoms

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 particular 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.

Indicators of 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.

Factors associated with physical 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 or belittling of a child;
- Over-hasty or violent reaction to a child's behaviour;
- Unrealistic expectations of a child's performance.

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.

Common non-accidental bruises include:

- Symmetrical black eyes are rarely accidental, although they may occur where there is a head injury. 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.

Unusual sites for accidental bruising include:

- 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.

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.

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.

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.

Indicators of Sexual Abuse

It is essential that professionals in contact with children accept that children of both sexes and all ages may be 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 become 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, these 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
- Inappropriate displays of affection between a child and adult e.g., flirtatious or seductive behaviour.

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

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.

Indicators of 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.

Indicators of 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 overprotective 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 delayed in language development;
- Have a low self-esteem and feelings of worthlessness;
- Suffer eating disturbances, growth failure or lack of body tone.

Serious Crime and/or 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.

Risk Factors - All Forms of Abuse, neglect and exploitation

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 and Disability.

Additional forms of abuse, neglect and exploitation to be aware of:

Within the area of abuse, neglect and exploitation staff must be aware of specific safeguarding issues as listed in Annex B of KCSIE :

Child abduction and community safety incidents

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

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence, it is important that they are given practical advice on how to keep themselves safe. This is done through the Life Skills programme.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

There are two age-appropriate guides to support children, 5-11-year-olds and 12-17-year-olds. The guides explain each step of the process, and the support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

Children missing education (CME)

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, neglect and exploitation, 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 DSL will investigate, involve parents if appropriate and seek advice from external agencies.

The 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, the School will hold more than one emergency contact number for each child.

The 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 for:

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

Children absent from education

It is important to recognise that children who are absent from school for prolonged periods or on repeat occasions, can indicate that the child could be at risk of a variety of safeguarding issues, including neglect, child criminal or sexual exploitation-particularly county lines. It is important that the School responds to these absences by being mindful of these risks and identifying where possible.

Support and information include:

- [Working together to improve school attendance](#) is guidance on how to maintain high levels of attendance and work with local authorities where there is a safeguarding risk.
- [Children missing education](#) is statutory guidance and advice on children missing in education and how to get them back into it. It includes information that schools must provide to the local authority when removing a child from roll at standard and non-standard transition points.

Pupils with poor attendance are discussed at the regular Wellbeing meetings in order to address risk factors and strategies for increased attendance.

Children with family members in prison These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. <https://www.nicco.org.uk/>

Child criminal exploitation (CCE) Child Criminal Exploitation (CCE) is where an individual (male or female, adult or child) 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.

Please note:

- 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.
- It is important to recognise that the experience of girls who are criminally exploited can be different to that of boys. The indicators may not be the same, but professionals should recognise that girls are equally at risk of CCE.
- It is important to note that boys and girls who are perpetrators of CCE are considered a higher risk of becoming victims of CSE (5.11).
- In addition, if a child is exploiting a peer, they themselves must be recognised as a victim.

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.

Child sexual exploitation (CSE) Child Sexual Exploitation (CSE) is a form of sexual abuse that 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. Please note:

- The victim may have been sexually exploited even if the sexual activity appears consensual.
- 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).
- CSE can occur over time, or be a one-off occurrence.

Additional indicators of CSE are:

- 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 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 child from the School is subject to CSE, they must share their concerns with one of the DSLs.

County lines
and/or gangs

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". County lines is recognised as a form of modern slavery under the Modern Slavery Act 2015.

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 increasingly being targeted and recruited online using social media. 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. The national Crime Agency (NCA, 2024) describes county lines as the most common form of coerced criminal activity in the UK. Any child involved is a victim, not an offender.

Criminal groups operate as a business, establishing a brand. Advertising on social media and messaging apps and compete with other groups by offering discounts and loyalty deals

Specific indicators that a child is involved in county lines activity include the child who:

- goes missing and is subsequently found in an area away from home;
- has been a victim or perpetrator of serious violence;
- is involved in receiving requests for moving drugs, handing them over or collecting money for them;
- ‘Plugging’ - where drugs are concealed to avoid detection;
- Found in accommodation with which they have no connection, often referred to as a ‘trap house’ or ‘cuckooing’;
- Owes a ‘debt bond’ to their exploiters;
- Have bank accounts used for criminal activity.

One of the ways of identifying potential involvement in county lines is 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.

[National Crime Agency - Modern slavery and human-trafficking](#)

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.

Modern slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk).

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- Denial of Service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL should consider referring it into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

Additional advice can be found at:

- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre - NCSC.GOV.UK <https://www.ncsc.gov.uk/>

Domestic abuse (DA)

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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. Harm includes ill treatment, both physical and non-

physical, but also the impact of ill treatment to others. Experiencing domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. In the meantime, it is important that staff consider domestic abuse when they identify a child of concern. Children are individuals and may respond to witnessing abuse in different ways. Some of the effects may include:

- they may become anxious or depressed;
- they may have difficulty sleeping;
- they may complain of physical symptoms such as tummy aches;
- they may start to wet their bed;
- they may behave as though they are much younger than they are;
- they may have problems with school;
- they may become aggressive or they may internalise their distress and withdraw from other people;
- they may have a lowered sense of self-worth;
- older children may begin to play truant or start to use alcohol or drugs;
- they may begin to self-harm, which can take numerous forms;
- Children may also feel angry, guilty, insecure, alone, frightened, powerless or confused. They may have ambivalent feelings towards both the abuser and the non-abusing parent.

If you are concerned that a child may be experiencing domestic abuse, you must follow the School's safeguarding procedures.

Operation Encompass is a system that ensures that when police are called to an incident of domestic abuse where children are present, they will inform the DSL at the School. The aim is that this information sharing occurs 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 080 8200 0247 [National Domestic Abuse Helpline](#)

Guidance:

[Preventing and Tackling Bullying](#)

[Mental Health and Behaviours in Schools](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Rise Above](#)

Honour-based Abuse

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 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 (see below).

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 staff to see visual evidence, and they should not be examining children 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.

Staff **must** personally report to the police any 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 children thought to be at risk or to suspected cases – here, staff should follow the usual safeguarding procedures.

To report FGM to local police, please contact Cumbria Constabulary on telephone 101.

[FGM Fact Sheet](#)

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 children 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

Preventing Radicalisation and the Prevent duty and Channel 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 the 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 of a person legitimising support for, or use of, terrorist violence.

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.

The 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, the 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.

Child-on-child abuse	See detailed information in the child-on-child abuse section.
Sexual violence and sexual harassment between children in school	<p>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. Sexual violence or sexual harassment exist on a continuum and may overlap; they can occur online and/or face to face, be physical and/or verbal and are unacceptable.</p> <p>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. It should be remembered that the context of the safeguarding incident may be outside of school, and could involve an intimate, personal relationship.</p> <p>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, and that there is a greater likelihood that the perpetrators will be boys.</p> <p>Staff should be aware of the importance of:</p> <ul style="list-style-type: none"> • Making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and are 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. <p>Dismissing or toleration any of these behaviours risks normalising them. Addressing inappropriate behaviour, even the seemingly innocuous, can be vital in preventing problematic, abusive and/or violent behaviour in the future.</p> <p>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 sexual violence or sexual harassment. The victim should never be made to feel ashamed for making a report.</p> <p>All staff must be aware that sexual abuse can happen between children. Child-on-child sexual abuse must be considered when safeguarding children. Please see specific section on child-on-child abuse.</p>
Upskirting	<p>Upskirting is 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 a criminal offence (The Voyeurism (Offences) Act, April 2019). Anyone of any sex can be a victim of upskirting.</p>

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:

- Drugs
- Fabricated or Induced Illness (FII)
- Faith Abuse
- Gender based violence
- Hate
- Private fostering
- Trafficking

Additional support Additional information and web links are available in Annex B of KCSIE – page 140 onwards (see the Toolkit).

Child-on-Child Abuse

Children can abuse other children and in situations where this occurs, it is often referred to as child-on-child abuse.

Windermere School has a zero-tolerance approach to child-on-child abuse.

Child-on-child abuse can take many forms. This can include (but it is not limited to):

- isolation;
- derogatory messages through texts and social media;
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All child-on-child abuse is unacceptable and will be taken seriously. The School recognises that statistically it is more likely that girls will be victims and boys the perpetrators of child-on-child abuse, but there will be situations where this is not the case. Sexual violence and sexual harassment will be responded to in accordance with the detailed guidance in Part 5 of KCSIE.

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. Copies of the School's Anti-Bullying procedure is available on our website; a paper copy can be requested from the School Office <https://www.windermereschool.co.uk/school-policies/>.

Procedures to minimise the risk of child-on-child abuse

Staff should recognise that children can abuse their peers, both inside and outside of school, and online.

Staff should recognise that even if there are no reports within the School, it does not mean that it is not happening, but it may be that it is not being reported. As such, if a staff member has **any** concerns regarding child-on-child abuse, they should speak to a DSL.

Staff should also understand that the School states that abuse is abuse and should not be tolerated or passed off as "banter" or "part of growing up". Downplaying such behaviour leads to a culture of unacceptable behaviours, an unsafe environment and, at worst, the normalisation of abuse, with children unwilling to report incidents. As such, it is important that all staff challenge any abusive behaviours between peers. All staff should have a clear understanding of the School's policy and procedures regarding child-on-child abuse and the role they have in preventing it or responding to it.

The School provides Relationship, Sex and Health Education (RSHE) to all secondary children and Relationship Education (RE) to all primary-aged children. Issues such as personal privacy, respect and consent are taught to ensure that our children 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.

Responding to a report or disclosure, including child-on-child abuse (incorporating sexual violence, sexual harassment, and consensual / non-consensual instances of youth-produced sexual imagery)

It is vital to note that a child may find it difficult to report abuse verbally and may use non-verbal communication, and staff should be mindful that if they have **any** concerns about the welfare of the child, they must act immediately rather than delay. The immediate reaction to a disclosure from a child is vitally important, and the way the staff member and the School respond can encourage or undermine the confidence of future victims of sexual violence or harassment to come forward.

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.

Irrespective of time delays in making the disclosure, children will be reassured that they are being taken seriously, that they will be supported and kept safe. Disclosures relating to online behaviours or outside of the School will be treated with equal seriousness. Disclosures will not be downplayed and the victim will never be made to feel ashamed nor their experience minimised.

Staff should be mindful that it should be reiterated to the victim that the law is there to protect, not criminalise children.

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

The victim will be supported in establishing positive and comfortable relationships within their year group and receive appropriate support within the School. 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 through the triage team.

Reporting safeguarding concerns, including child-on-child abuse concerns

Effective safeguarding practice in managing a report includes:

- Where possible, managing reports with two appropriate members of staff present, with at least one ideally being a DSL.
- If the disclosure contains an online element, the staff should be aware of Searching screens and confiscation advice for schools, and UKCIS Sharing of nudes and semi-nudes; advice for education settings working with children and young people. **Most importantly, staff must NOT view or forward illegal images of a child.**
- Never promise confidentiality in the initial stages as the disclosure will most likely require sharing. Staff should only share details appropriately, such as with the DSL, and the victim should be aware of this, and understand what the next steps will be.
- Recognise that the children will disclose abuse to a person they trust, and that could be anyone at the School.
- Staff should recognise that the initial disclosure may be the first incident reported but not reflect historical abuse. Trauma can impact memory, and so the child may not have clarity on timelines or details of abuse.
- Be mindful that there are many barriers to talking about abuse, such as feeling vulnerable, disability, ethnicity, gender or gender orientation.
- The staff member to whom the disclosure is being made should actively listen, reflect back, use the child's language, be non-judgemental, be clear about boundaries, and also be clear about how the disclosure will be progressed. They will not ask leading questions, and only prompt the child where necessary with open questions. Whilst leading questions should be avoided, staff can ask the child if they have been harmed and what the nature of that harm was.
- Be mindful of how to record the report. Best practice is to wait until the end of the disclosure and then write a summary, thus allowing the staff member to give the child their full attention and actively listen. Making notes can be acceptable, for example if two members of staff are present, but should never be at the risk of the child feeling that the staff member is not fully engaged. It is essential that a written report is made and that is transferred onto My Concerns.

- Only record the facts as the child presents them, and never include personal opinion or supposition of the staff member. Staff must be aware that these notes may become part of a statutory assessment by children's social care or a criminal investigation.

Risk Assessment

Where there has been a report of sexual violence or harassment, the DSL should make an immediate risk assessment that addresses the risk and needs of the victim, including:

- the victim, their protection and support;
- whether there have, or may be, other victims;
- the perpetrator;
- all other children
- and, where necessary, staff and any actions necessary to protect them from the perpetrator and future harm.

Risk assessments will be recorded and be dynamic. The DSL will liaise with the appropriate external services.

Action Following a Disclosure

The School will maintain the attitude that 'it could happen here'. The School will respond to **all** reports and the DSL, who is most likely to have a complete safeguarding picture, will be the most appropriate person to advise on the School's immediate response. The School will act in the best interests of the child.

Considerations of this will include:

- the wishes of the victim(s) and how they would like to proceed. This is of particular importance in cases of sexual violence or harassment, where they should be given as much control as possible, balanced with the School's duty and responsibilities to protect other children;
- the nature of the disclosure, including whether a crime has been committed;
- the ages of the victim(s);
- any power imbalance between victim and perpetrator;
- whether the disclosure was a 'one-off' incident or part of a pattern or series of abuse;
- an understanding of intra-familial harms and risks, and whether any siblings require support after an incident(s);
- that sexual violence and harassment can take place within an intimate relationship between peers;
- any ongoing threat of violence to the School community; and
- wider context issues, including links to CSE and CCE.

Children Sharing Classrooms

Any report of sexual violence is traumatic for the victim(s), but reports of rape or assault by penetration are particularly so, and especially difficult if the victim(s) has close proximity to the perpetrator(s). Whilst establishing the facts of the case, and where necessary referring to external agencies, the alleged perpetrator(s) should be distanced from the victim(s), and careful consideration should be given to how this distance can be maintained. These actions are in the best interests of all children involved and are in no way seen as a judgement.

Options Following a Disclosure

Each disclosure will be treated holistically. There are four likely scenarios that the School will consider when managing disclosures of sexual violence or harassment, and those decisions will be regularly reviewed. Lessons learnt will be reflected upon in updating relevant policies. If patterns of behaviour are identified, Windermere School will consider whether there are wider cultural issues within the School and respond appropriately.

The four scenarios are:

Manage internally In some cases of sexual harassment, for example on-off incidents, the School may be of the opinion that the victim is not in need of early help, or that external referrals are required and that it would be appropriate to handle the incident internally, utilising behaviour management and pastoral support and education, whilst reiterating a zero-tolerance approach. All disclosure, no matter the response, will be recorded on My Concerns.

Early Help The School may determine that the child/children may benefit from Early Help, which will provide support as the problem emerges, at any point in the child's life. Early help and the option to manage a report within the School do not need to be mutually exclusive, with the School managing internally, and seeking early help for victim (s) and perpetrator(s). Early help is a support system for children all ages, aiming to improve resilience and outcomes, or reducing chances of the problem escalating. It is a system of support.

[The Early Help System Guide](#) is a toolkit for Early help.

Any child can benefit from Early Help, but staff should be particularly alert to the child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and other drugs themselves;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- **is a privately-fostered child.**

Referral to children's social care

If a child has been harmed or is in immediate danger, the School will refer to the CSCP. If appropriate to do so, consent will be gained from a parent/guardian. The School will work alongside the relevant external personnel, recognising that collaborative work will ensure the best package of support for the victim and, where necessary, the perpetrator.

The School will not await the outcome of any external investigation before putting measures in place that support the victim and, where necessary, the community. The DSL will need to work closely with external agencies, but in a way that does not jeopardise any statutory investigation. Where an investigation is not deemed necessary, the School will be prepared to re-refer if necessary. Where external support is deemed unnecessary, the School will consider internal measures.

Report to the police

All reports to the Police will run in tandem with a referral to CSCP. The DSL will be clear about local processes and how to follow them. Where there is a disclosure of rape, assault by penetration or sexual assault, the initial response is to report it to police.

Although the age of criminality is ten, if the alleged perpetrator is under ten, the initial report is still to the police, who will take a welfare rather than criminal justice approach. The following advice may be used to determine when to call the police. The police will guide the DSL on what may be shared with staff. Parents will be informed, unless there are particular reasons not to do so. Where a decision is made NOT to inform the parents, the School will work with external agencies to support the child.

The police will use specialist units to investigate disclosures of this nature. If no further action is to be taken by the police, the School will aim to arrange relevant support, be it internal or external. Where there are delays in investigations or the criminal justice system, the School will not delay in protecting all those involved. The DSL will work with the school leadership team to mitigate any risk that could follow prosecution.

The School will adopt a holistic approach to ongoing support for anyone involved in any disclosure, be they child or staff. Unfounded or malicious reports will be taken seriously, with due consideration given to whether the person who made the allegation is in need of help, is making a cry for help, or has been abused in the past.

The School will endeavour to obtain parental consent for referrals to statutory agencies, where appropriate.

Ongoing support

Considerations will be made to the following:

- The needs and choices of the victim are paramount, as is the protection of that pupil.
- Age and developmental stage of the victim will not only indicate potential future or ongoing risk, but nature of support required.
- A victim should never be made to feel that they are the problem for making a disclosure.
- Response should be proportional.
- Sexual assault can lead to a range of health considerations, some of which are immediate. Appropriate counselling should be tailored to those concerns.
- Victims may not disclose an entire incident(s) immediately, and feel more comfortable making partial disclosures over time.
- A victim may find that 'normal' school days are not possible after a disclosure and the School will respond to the needs of that child supportively and sympathetically.
- Altered arrangements for victim(s) and perpetrators(s) may be protracted.
- The School will do all they can to protect the victim(s) from harassment following the disclosure.
- All necessary support should be offered to maintain school attendance for all involved.
- Should any child involved in the disclosure/investigation relocate to another school, the DSL will ensure that a full handover is made.

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 DSLs. The School stresses 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. CSCP 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.

CSCP 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.

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 the 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.

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.

The harm threshold

Allegations that may meet the [harm threshold](#) are those where it is alleged that a person who works with children has:

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

All such allegations are naturally taken very seriously.

The initial referral process for allegations against staff are:

1. If a child discloses that a member of staff, including supply staff, contractors and the DSLs or a volunteer working at the School, has behaved in a way which is abusive, then this information should go straight to the Head.
2. If the Head is not available, the DSLs will communicate directly with the Chair of Governors or the Safeguarding Governor, who will then take the allegation to LADO.
3. If the allegation is about the Head, then the Chair of Governors must be informed directly without informing the Head.
4. If the allegation is about the Chair of Governors, then the matter will be referred to the vice Chair.
5. If there is any perceived conflict of interests in terms of reporting the issue to the Head, then it should be reported straight to the LADO.

The School will not undertake its own investigations without first consulting with the 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.

Throughout the process of an allegation made, the LADO will review the circumstances with the case manager to determine whether improvements can be made in the School's procedures to prevent similar events occurring in the future.

The 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 fully with relevant parties; this includes supply teacher agencies, contractor companies and volunteer organisations.

If you have concerns regarding an adult who works with a child, this should be reported to the 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:

- Tel: 030 0303 3892
- Fax: 01768 812090
- Email: lado@cumbria.gov.uk (please note: if sending by email, the document should be password protected)
- Post: LADO, Cumbria Safeguarding Hub, Skirsgill Depot, Penrith, Cumbria, CA10 2BQ
Please note that 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 9.00am to 5.00pm and Friday 9.00am to 4.30pm.

In case of an emergency outside 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).

Please also refer to the School's Whistleblowing Policy:

<https://www.windermereschool.co.uk/school-policies/>

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 email help@nspcc.org.uk or call 08000 280285 between 8am and 8pm, Monday to Friday.

Reporting Allegations

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, the 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.

If an allegation is substantiated and the person is dismissed, 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 the 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. The School understands 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: 03000 200190

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.

Issues of professional misconduct where a teacher has been dismissed (or would have been dismissed if they had not resigned) also have to be referred (in conjunction with LADO) to the

Teaching Regulatory Agency (TRA). This will occur where the School considers that the teacher involved could be accused of unacceptable professional conduct or conduct which would bring the profession into disrepute.

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, they will decide whether to make a prohibition order in respect of the person.

Malicious allegations against staff

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.

Low level concerns and allegations

Low level concerns and allegations are concerns that do not meet the harms test.

The term 'low-level' concern does not mean that it is insignificant, it simply means that the adult's behaviour towards a child does not meet the harm threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the School's staff code of conduct, including inappropriate conduct outside of work and/or is otherwise not serious enough to consider a referral to the LADO. However, it may merit consulting with and seeking advice from the LADO on a no-names basis if necessary.

Low-level concerns should be reported to the same persons as set out above in the section on 'Allegations against staff'. Staff do not need to be able to determine in each case whether their concern is a low-level concern or not, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a concern with the appropriate person, the determination on its nature will be made by that person.

Responding to a low-level concern

Low-level concerns about supply staff and contractors should be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

When a low-level concern has been raised by a third party, the Head should collect as much evidence as possible by speaking where possible with the person who raised the concern, the individual involved and any witnesses.

All reports of low-level concerns will be recorded in writing, noting:

- Details of the concern;
- The context in which the concern arose;
- Action(s) taken;
- The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible;
- The rationale for all decisions and actions taken must be recorded.

Records of low-level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

Where a pattern of behaviour is identified, the School should decide on a course of action. This might be internal disciplinary procedures or referral to the LADO if the harm threshold is met.

The School must consider whether any wider cultural issues in the School enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

The School aims to create an environment where staff are encouraged and feel confident to self-refer where they feel that their behaviour has fallen below the expected professional standards.

Staff Code of Conduct

In accordance with the guidance contained in KCSIE , the School has a Staff Code of Conduct, and this is reviewed annually. The Staff Code of Conduct runs alongside the Staff Handbook. These documents encourage a culture of openness, trust and transparency in which the School's values and expected behaviour are not just set out but are constantly lived, monitored and reinforced by all staff. Staff are asked to sign once a year to indicate that they have read and understood the key issues.

The Code of Conduct and the Staff Handbook provide staff with clear guidance about their expected behaviour and actions so as to not place children or staff at risk of harm or allegations of harm to a child. The School has tailored this guidance accordingly, in order to give advice about appropriate behaviours with regard to operating within the boarding houses and the EYFS section of the School. These documents also contain information about one-to-one tuition, sports coaching, Round Square exchanges, overseas visits, conveying children by car and appropriate electronic communication.

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.

Physical Contact with Children

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 the 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.

Recruitment Procedure

Safer recruitment procedures

The 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. The Windermere School Recruitment Policy and Recruitment Procedures are available online: <https://www.windermereschool.co.uk/school-policies/>.

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 pupils, administrative staff, caretakers and other ancillary staff, staff appointed from overseas, and 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 in these situations and will carry out the appropriate checks for this category of people. The main groups are as follows:

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 in order to be assured of the person's suitability and the School will always carry out identity checks on arrival.

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 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.

Protection of Freedoms Act 2012

The guidance issued following the amendment to Safeguarding Vulnerable Groups Act 2006 (which removed supervised volunteers from regulated activities) states:

- 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 is supervised as this is not in a regulated activity.

Employment Process

We obtain at least two 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 Safer Recruitment Guidance Procedures. As part of the shortlisting process, the School may consider carrying out an online search of the candidate as part of their due diligence process, in order to identify incidences or issues that are available publicly on-line, that may require exploration with that candidate. The School should inform the shortlisted candidate that on-line searches may be carried out.

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 checks and 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; and
- 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 DBS and are seen to be compliant with the Independent School Standards Regulations (ISSR) before starting work at the School.

All offers of employment are conditional until mandatory pre-employment checks have been satisfactorily completed.

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 always be appropriately supervised. In these rare circumstances, all other checks, including a separate barred list check, will have been completed.

All teachers, 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.

The School will make use of the Department of Education's [web page](#) to check a teacher's record.

All governors are required to have an enhanced criminal record certificate from the DBS, in line with the KCSIE recommendation that the School also uses the above address 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, 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.

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, the School will make any further checks considered appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available:

- criminal records checks for overseas applicants; and
- obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked, confirming that they have not imposed any sanctions or restrictions and/or that they are aware of any reason why the person may be unsuitable to teach.

Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess suitability for the application.

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 or Deputy Head/Head of Prep School, prior to starting their first placement session.

The Student Liaison member of Staff for the Prep School is Mrs J Davies (Head of Prep School) and the Student Liaison member of Staff for the Senior School is Mrs L Moses (Deputy Head).

Effective implementation of the safeguarding policy

Transparency

The School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the 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.

Raising awareness with pupils

The 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 online 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.

- 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, Wellbeing centre and all our boarding houses display advice on where pupils can seek help. These details are also visible throughout the school.

- 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. Equal treatment

The 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 pupil.

Looked After Children

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 Looked After Children (LAC) 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.

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.

The designated person for children looked after at the School are the DSLs.

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

The DSL 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 the legal status of a child looked after (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 DSL, 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.

Use of the School premises for non-school activities

Should the School hire or rent out school premises/facilities to organisations or individuals, the governors should ensure that appropriate measures are in place to ensure children's safety.

Where activities are under the supervision or management of School staff, their arrangements for Child Protection will apply. Should the activities or services be provided by another body the School must ensure that the provider has appropriate safeguarding and child protection policies and procedures in place. This is irrespective of whether children are on the school roll will attend these activities. The School and external provider will adhere to guidance provided at [Keeping children safe in out-of-school settings](#).

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.windermerschool.co.uk/school-policies/>

Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including educational outcomes.

The 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.

Appendix 1 – Contacting Cumbria Safeguarding Hub

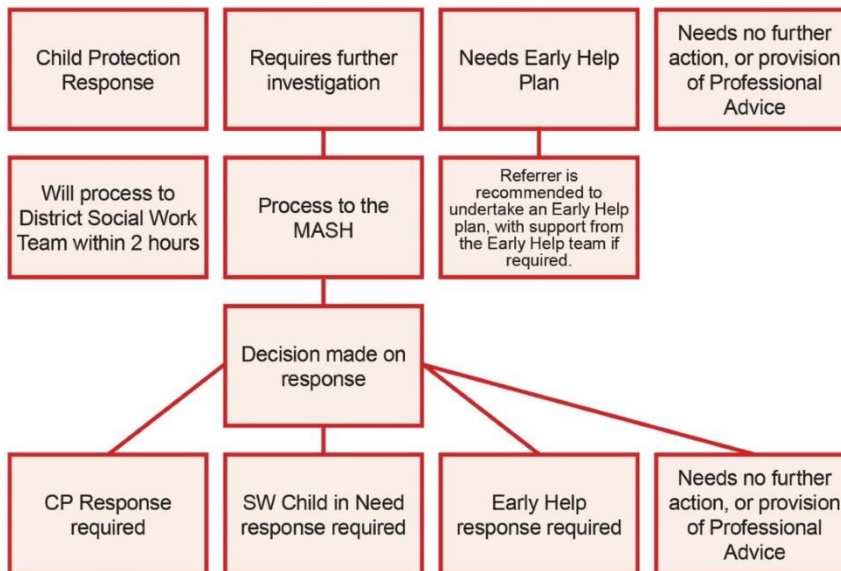
Contacting Cumbria Safeguarding Hub

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.

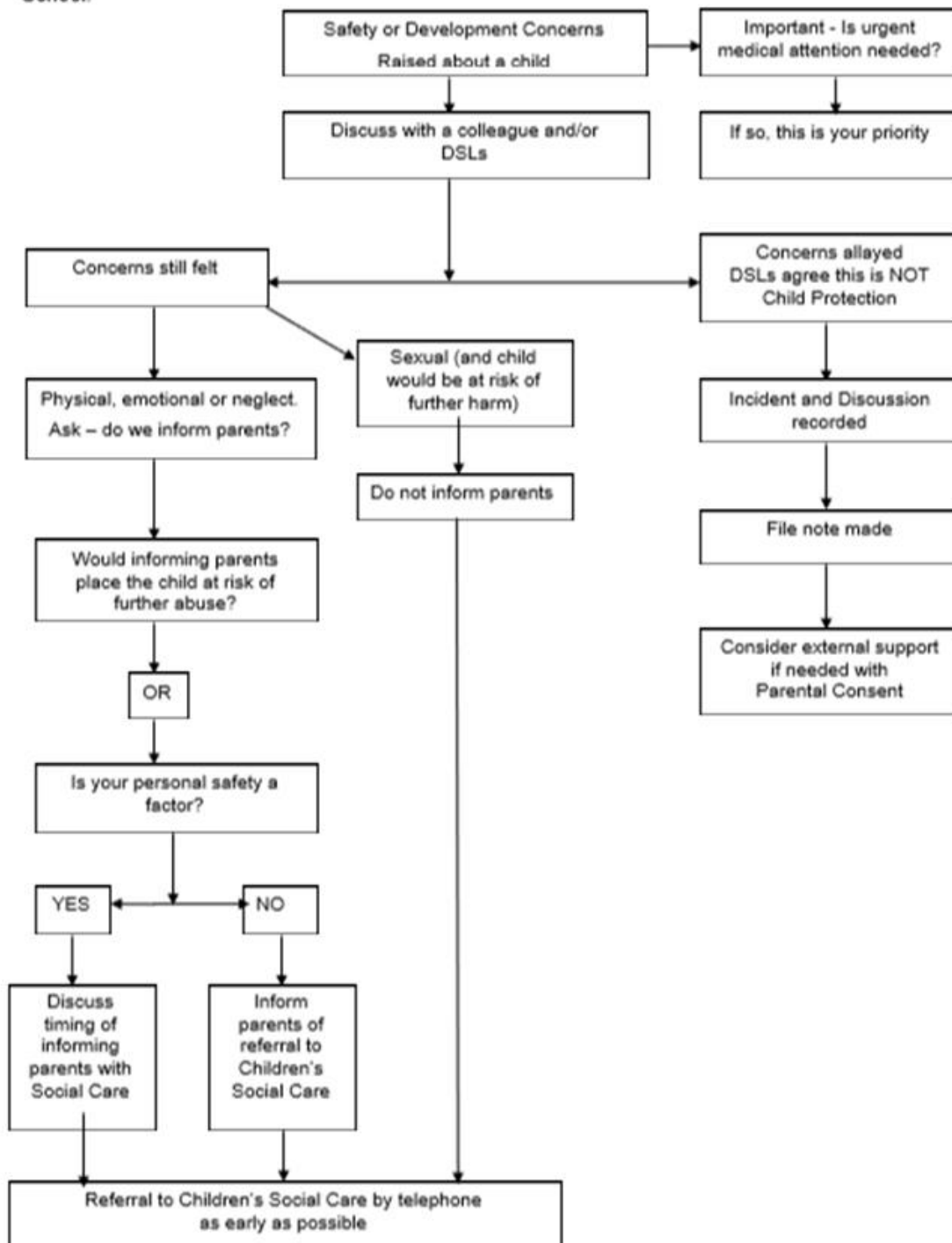
Unless your contact requires an immediate child protection response the Hub will ask you about the recent Early Help Plan and Team around the child meetings and will make a decision about the level of vulnerability. This will be either:



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.

Appendix 2 – Child Protection Process – Parental Involvement

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 every year in Safeguarding - Child Protection protocol. During the sessions staff are given guidance to ensure that their behaviour and actions do not place children or themselves at risk of harm or allegations of harm to a child.
 - Situations to be aware of are those when staff are alone with a child. Staff are advised to not be alone with a child 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 child are advised to ask them to sit in the back.
 - Staff are required not to email children on their personal accounts, engage in communication through social networking sites, or text children 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 for appropriate advice.
- Staff must note that they cannot ever promise confidentiality to a child who wants to tell them something.
- When a child discloses something, the staff member must inform them that they will have to report 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 children against another child, it must be reported immediately to the DSLs, and arrangements will be made to keep all the pupils 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.
- The 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 child) 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 03000 200 190

Appendix 4 – Useful Documentation and websites

[Keeping Children safe in Education](#)

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

[Working Together to Safeguard Children](#)

[Cumbria Safeguarding Children Partnership](#)

[NSPCC Help and Advice](#)

[London Grid for Learning](#) – advice for young people on how to deal with having been tricked into getting undressed online without frightening them.

[County Lines Toolkit for Professionals](#)

Appendix 5 – Child Protection and Exchanges

Windermere School – Exchanges and keeping our pupils safe

Following a meeting to review child protection across the School and the opportunities offered to our pupils 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, the School has sent Year 9 pupils 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 pupil to the lowest 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 pupil to partake in the exchange programme.

The Round Square organisation suggests the following questions are asked:

- Are the two families carefully matched?
- Is 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 pupil needed to be moved at short notice, has the school got contingency plans in place?
- Has travel been considered and have questions been asked about who will drive a pupil 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 pupils have access to a phone to either call or text at any time, if necessary?
- Have all exchange pupils 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 pupils will require a DBS check plus anyone over 16 staying in their household. The 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, the 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 pupils 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 pupils 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 pupil is on exchange.
- To DBS check families who are hosting exchange pupils.
- 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 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 Pupils

- 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/guardians 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 regard 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, 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 pupil.

Appendix 6 – Guardianship and keeping our pupils safe

Please see the Windermere School Guardianship Policy and Procedures documents.

Appendix 7 – DSL Responsibilities

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.

Working with Others

- Liaise with the Head to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes a requirement for children to have an appropriate adult.
- Liaise with the case manager and the designated officers at the local authority for child protection concerns in cases that 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.

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 Advanced Safeguard training, including inter-agency training, every two 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 Safeguarding and Child Protection.
- To keep detailed, accurate written records securely.
- Encourage a culture among all staff of listening to children and taking into account their wishes and feelings.
- 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.

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 pupils.
- Ensure that parents are aware that they should be aware of the contents of the Safeguarding - Child Protection Policy.
- Ensure children 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.

Record Keeping

- The School's paper records on safeguarding 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 Concerns.
- All relevant safeguarding documents can only be accessed by the DSLs, the Head, and the Governor with responsibility for Safeguarding. Records will be archived indefinitely, combining medical and safeguarding records.

Records should include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached and the outcome.

Manage and maintain the safeguarding files (longer term)

- When children leave the School, ensure their child protection file is copied in a secure form for any new school or college as soon as possible, and within five days for an in-year transfer, or within the first five days of the start of a new term, thus affording the new establishment to have a support system in place in a timely manner. These records will be sent 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 to 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.

Appendix 8 – Tracking document amendments

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 helpline	Version 20.4	April 2021	J Davies / S Brown
Reviewed and updated to version 21 in line with the KCSIE September 2021	Version	September 2021	J Davies / S Brown
Reviewed as version 21	Version 21.1	September 2021	A Chamberlain (Chair) and Governing body
Amended	Version 21.2	October 2021	S Brown
Reviewed	Version 21.2	November 2021	J Davies / S Brown
Amended to update Early Years DSL	Version 21.3	January 2022	J Davies
Reviewed and updated to version 22 in line with KSCIE September 2022	Version 22	September 2022	S Brown/J Davies
Amended in light of change of Governors	Version 22.1	March 2023	S Brown
Reviewed and updated to version 23 in line with KCSIE September 2023 and staff changes	Version 23	August 2023	S Brown
Updated to version 24 in line with KCSIE September 2024	Version 24	August 2024	S Brown
Updated to version 25 in line with KCSIE 2025	Version 25	August 2025	S Brown
Reviewed	Version 25.2	October 2025	F Thompson