



Safeguarding and Child Protection Policy

This document applies to all parts of The Pilgrims' School, including parents and pupils in the Early Years Foundation Stage

Responsibility of: Designated Safeguarding Lead
Reviewed: September 2025
Next Review Date: September 2026
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Background

At The Pilgrims' School, the protection and welfare of our pupils is of paramount importance.

The Pilgrims' School staff (including governors and Pilgrims' Committee, supply staff and volunteers) have a child-centred approach to safeguarding, always considering the child's best interests and recognising that safeguarding is everyone's responsibility. We understand the importance of receiving the right help at the right time in addressing risks and preventing escalation. We are committed to acting on, and referring, early signs of abuse and neglect and reassessing and challenging any inaction. Creating a culture of vigilance in and around the school, is crucial.

Pilgrims' School is a single sex, boarding and day school for children age 4-13 and this policy includes regard to EYFS, Ofsted, ISI (Independent Schools Inspectorate) NMS (National Minimum Standards). Although pupils at Pilgrims' fall between the ages of 4-13, this policy applies to all children to 18 whether attending school or not.

This policy applies to the Prep and Pre-Prep Departments, including the Early Years Foundation Stage. This policy is available to parents, both on the School's website and as a paper copy on request from the Head's PA. This policy is written in accordance with inter-agency procedures agreed with the **Hampshire Safeguarding Children** Partnership (HSCP) and has regard to the following guidance and advice:

['Keeping Children Safe in Education' \(July 2025 - Draft\) \(KCSIE\)](#)

['Working Together to Improve School Attendance' \(August 2024\)](#)

['Working together to Safeguard Children 2023 \(Updated December 2023\).](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\) - GOV.UK \(www.gov.uk\)](#)

['What to do if you're worried a child is being abused' \(2015\).](#)

['Revised Prevent Duty Guidance: for England and Wales' \(2015\).](#)

[The Revised Prevent Duty: Departmental advice for schools and childminders \(2015\).](#)

[The use of social media for online radicalisation \(2015\).](#)

[Disqualification under the Childcare Act 2006 \(2018\).](#)

[Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(2020\).](#)

[Information sharing: advice for practitioners providing safeguarding services to children, young people \(2018\).](#)

[Children missing education \(2016\).](#)

[Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from sexual exploitation \(2017\).](#)

[Multi-agency statutory guidance on female genital mutilation \(2016\).](#)

[Sexual Offences Act 2003 – Up skirting - Voyeurism Offences Act April 2019](#)

As a school, we review this policy at least annually in line with DfE, HSCP, HCC and any other relevant guidance.

- Last reviewed September 2025

This policy should be read in conjunction with the following related school Policies:

- Anti-Bullying policy
- Promoting positive behaviour, discipline, and exclusions policy
- IT acceptable use policy
- Pilgrims' Boarding House Electronic Device Policy
- Relationships Sex and Health Education policy (RSHE)
- Recruitment Policy
- Restraint policy
- SEND Policy
- Health and safety policy

- EYFS mobile device policy
- The Staff code of conduct

Policy Aims

Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children and, in so doing, ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the School.
- To demonstrate our commitment to safeguarding children.

Policy Statement

Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life and also beyond school. As a school, we are committed to safeguarding and promoting the welfare of all our pupils.

The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the School. As such, this overarching policy will link to other policies which will provide more information and greater detail.

Safeguarding means:

- protecting children from abuse and maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Principles and Values

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

Safeguarding measures are put in place to minimise harm to children. There may be occasions where gaps or deficiencies in our policies and processes will be highlighted. In these situations, a review will be carried out in order to identify learning and inform the policy, practice and culture of the school. As a boarding school, and a double-choir school, the School is acutely aware of its duty of care to safeguard children.

The Pilgrims' School as a listening school

All boys at The Pilgrims' School, regardless of their age, have a comprehensive support network around them. They have a significant number of people to whom they can turn at any time. These include the teaching staff, form tutors, coaches, prefects, house parents, nursing staff, and the DSLs (Designated Safeguarding Leads). All staff are committed to giving the children in our care the time and space that they need. Staff will listen to the pupil, take their worries seriously and share the information with the safeguarding lead.

In addition, we provide pupils with information about who they can talk to outside of school (for example, the Independent Person for Boarders), both within the community and with local or national organisations that can provide support or help.

Operation Encompass Safeguarding Statement

The Pilgrims' School is part of Operation Encompass. Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience domestic abuse.

Operation Encompass is in place in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

There is a legislative requirement for police forces to share information with educational settings through Operation Encompass.

Through Operation Encompass the police will share information with our school about ALL police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information will occur PRIOR to the start of the next school day. The notification will inform us about the context of the incident and will include the Voice of the Child.

The DSL, Craig Cuyler, undertook training on 25/01/2026.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

The School is aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.

The Designated Safeguarding Lead will report on Operation Encompass in the termly report to the Pilgrims' Committee. All information is anonymised for these reports.

When the Head, DSL or DDSLs leave the school and other staff are appointed, we shall ensure that all Operation Encompass log in details are shared with the new Head/Key Adults and that the new members of staff will undertake the Operation Encompass online training.

Local contacts

The Hampshire Children's Services procedures can be found at:

Children's Services Department

Hampshire County Council

Elizabeth II Court North

The Castle

Winchester

SO23 8UG

Email. Childrens.services@hants.gov.uk

Telephone: 0300 555 1384 (0830-1700 Monday to Thursday, 0830-1630 Friday)

Out of Hours: Professional line 0300 555 1381

MASH (Multi Agency Safeguarding Hub) can be contacted at the numbers above

Any links to local or national advice and guidance can be accessed via the safeguarding in education webpages: www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance

Links to online specific advice and guidance can be found at

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/onlinesafety>

Links to other pages from the local authority on safeguarding can be found at

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren>

The procedures of the Hampshire Safeguarding Children Partnership can be accessed at

<http://hipsprocedures.org.uk/page/contents>

LADO (Local Authority Designated Officer) deals with allegations against adults in a position of trust.

The Hampshire Independent School D.O. (Designated Officer) is contactable via:

Email: childprotection@hants.gov.uk

Phone: 01962 876364

The DfE dedicated non-emergency helpline for support and advice about extremism:

Phone: 020 7340 7264

Online: counter-extremism@education.gsi.gov.uk

If you're concerned about possible terrorist activity or risk of radicalisation and there is no immediate threat, you can refer the individual for support by contacting any one of the following:

Hampshire Adult Services on **0300 555 1386**

Hampshire Children's Services on phone 0300 **555 1384**

Hampshire Police on **101**

Anti-Terrorist Hotline on **0800 789 321**

Complete an online form if you wish to report [suspected terrorist activity](#).

Download and complete the [Prevent National referral form](#) if you are concerned that someone may be displaying extremist behaviour or ideology or radicalisation.

Teaching Regulation Agency (TRA)

Address: Teacher Misconduct, Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry. CV1 2WT

Tel: 0207 593 5393

Email: misconduct.teacher@education.gov.uk

NSPCC Whistleblowing Advice Line

Phone: 0800 028 0285

Email: help@nspcc.org.uk

Areas of Safeguarding

Keeping Children Safe in Education (2025) and the Ofsted inspection guidance (2024), have highlighted and separated several safeguarding areas: -

- Emerging or high-risk issues
- Those related to the pupils as an individual
- Other safeguarding issues affecting pupils
- Those related to the running of a school

Definitions

Within this document:

'Safeguarding' is defined in the Children Act 2004 as protecting from maltreatment; preventing impairment of health and development; ensuring that children grow up with the provision of safe and effective care; and work in a way that gives the best life chances and transition to adult hood. Our safeguarding practice applies to every child.

Staff applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes parent volunteers and Governors.

Child refers to all young people who have not yet reached their 18th birthday. Overall, this will apply to all pupils of our school; however, the policy will extend to visiting children and students from other establishments

Child in Need refers to a child who is not suffering from, or at risk of, serious harm but may need additional support either through health or educational provision e.g. Children and Adolescents Mental Health Services (CAMHS), Early Help or other local agencies.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, stepparents and foster carers.

DSL Designated Safeguarding Lead

DDSL Deputy Designated Safeguarding Lead

Key personnel



Craig Cuyler: Director o Wellbeing, DSL, Head of PSHEe

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John Reid: Head of Pastoral Care & Director of Studies

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Sarah Hall: Head of Pre-Prep & DDSL - Nominated EYFS Safeguarding Lead

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Steven Cliff: IT Manager & DDSL - for online safety only

Email: dsl@pilgrims-school.co.uk

scliff@pilgrims-school.co.uk

Phone: 01962 854189



Jules Flory: Safeguarding and Child Protection Member of The Pilgrims' Committee
Email: jflory@pilgrims-school.co.uk



The Chair of the Pilgrims' Committee is:
Mrs Alison Mayne (Fellow of Winchester College)
Email: Contact school office

The boarders also have access to an Independent Person who is Kate Grosscurth: 01962 835752

DSL and DDSL biannual training updates next due:

CXC: June 2026
JR: September 2026
BH: January 2026
SH: January 2026
TAB: April 2026
SC: April 2027
JF: January 2027

Pilgrims' Committee training update next due: January 2026

Responsibility of the Designated Safeguarding Lead

Safeguarding is everyone's responsibility, and anyone can make a referral to children's social care. The DSL will always support staff with their worries or concerns about the pupils in our care.

In addition, as required, the DSL is responsible for:

Managing referrals:

- Refer cases of suspected abuse to the local authority children's social care as required and support staff who make such referrals.

- Refer cases to the Channel programme where there is a radicalisation concern and give support to staff who make referrals.
- Refer cases where a person is dismissed or has left due to risk/harm to a child, to the Disclosure and Barring Service
- Refer cases where a crime may have been committed to the Police.
- Be aware of pupils who have a social worker (we recognise that this is an indicator that the child is more at risk than other pupils and take this into account)
- Help promote the educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school leadership staff.

Working with others:

- Inform the Headmaster of issues, especially ongoing enquiries, under section 47 of the Children Act 1989, and police investigations
- Liaise with the 'case manager' and the designated officer at the local authority, for child protection concerns, in cases which concern a staff member
- Liaise with staff especially pastoral support staff, school nurses, IT technicians and the Head of Learning Support, on matters of safety and safeguarding (including online and digital safety)
- Liaise with relevant agencies when deciding whether to make a referral (staff should refer to the levels of need document for advice on thresholds)
- Act as a source of support, advice and expertise for all staff.

Training:

- The DSL and DDSLs should undergo training to provide them with the knowledge and skills required to carry out the role. This will be updated every two years.
- The DSL should undertake Prevent Awareness training every two years.
- The DSL will refresh their knowledge and skills at regular intervals.
- The DSL should attend training courses and national conferences and reading Hampshire and NSPCC safeguarding bulletins regularly.
- Have membership of Safeguarding Pro (led by Andrew Hall)

The above responsibilities will enable the Designated Safeguarding Lead to:

- Understand the assessment process for providing early help and statutory intervention, including criteria for action and local authority children's social care referral arrangements.
- Have a working knowledge of how local authorities conduct child protection case and review conferences and be able to attend and contribute to these effectively
- Ensure all staff have access to, and understand, the School's child protection policy and procedures, especially new and part-time staff
- Be alert to the specific needs of children in need, particularly young carers and SEN pupils
- Keep detailed, accurate, secure written records of concerns and referrals
- Understand and support the school with regards to the requirements of the Prevent Duty and be able to provide advice and support to staff on protecting children at risk of radicalisation.
- Understand unique risks associated with online safety and be confident that they have the knowledge and up-to-date capability required to keep children safe whilst they are online at school
- Recognise further risks that children with SEN and disabilities (SEND) face online (e.g. from online bullying, grooming and radicalisation) and be confident in supporting SEND pupils to stay safe online
- The DSL has overall responsibility for online safety and liaises with the IT staff, Director of Finance & Resources and Head of Digital Learning to facilitate this.
- Obtain access to resources and attend relevant refresher training courses

- Encourage a school-wide culture of listening to children and taking account of their wishes and feelings in any measures the school may put in place to protect them.

Raising Awareness:

Ensure the School's Safeguarding and Child Protection Policy is:

- known, understood and used appropriately
- reviewed at least annually and that procedures and implementation are updated and reviewed regularly, working with the Governing Body regarding this
- available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the School in this

Transfer of records and information:

- When children leave the School, the DSL must ensure their safeguarding file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained and kept on record.
- The DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving in order to help their new school support them appropriately.

Availability:

- During term time, the DSL or deputies should always be available, in person, (as far as possible) for anyone to discuss any safeguarding concerns. The DDSL (online safety) should only be contacted if it is specifically 'online safety' related.
- The DSL or a nominated DDSL will always be available for any out-of-hours or out-of-term activities.

Oversight of Safeguarding

The Pilgrims' Committee

In the Christmas Term, the Pilgrims' Committee – in the person of the nominated member for safeguarding - undertakes a review of the Safeguarding and Child Protection Policy, its procedures and the efficiency with which the duties have been discharged. All deficiencies or weaknesses in safeguarding at any time, are remedied without delay.

The Pilgrims' Committee will ensure, through the DSL, that the School contributes to inter-agency working, in line with [Working Together to Safeguard Children \(2023\)](#) by fostering a good relationship with local agencies and ensuring that there is effective implementation of all child protection related policies.

Arrangements for reviewing policies and procedures

- Policies are reviewed regularly, and the Safeguarding and Child Protection Policy is reviewed annually by the DSL and the Pilgrims' Committee.
- The DSL trains the Pilgrims' Committee in safeguarding, in accordance with guidelines from Hampshire CC and includes them in any email updates to staff. The DSL also reports in person to the Pilgrims' Committee on all things which are related to the role, giving appropriate statistics as necessary, on an annual basis at least. A record of the formal annual review of safeguarding is kept.
- The School draws upon the expertise of its staff, where possible, in shaping the School's safeguarding and child protection procedures or practice, to help minimise the risk of safeguarding situations occurring in future.

Promoting Awareness

For Pupils

Our curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of every pupil. All our staff play a vital role in this process, helping to ensure that our pupils relate well to one another and feel safe and comfortable in our school.

We expect all staff and volunteers, regardless of their role, to lead by example and actively promote age-appropriate awareness amongst pupils on issues relating to health, safety and well-being. All staff have an important role to play in insisting and enforcing that those pupils always adhere to the Behaviour and Anti-Bullying Policy. Boarding house staff have a particularly important role to play.

At Pilgrims', time is allocated in INSET, PSHEe, Tutor Time and Circle Time, for discussing what constitutes appropriate behaviour, safe use of the internet and mobile devices, cyber-bullying and why bullying and lack of respect for others is never right. Assemblies, chapel services and PSHEe lessons are used to promote mutual respect and understanding. Pupils have regular tutor time in which health and well-being issues are discussed and activities practised.

For Parents

Online safety evenings/Wellbeing Matters 'Live' sessions raise awareness and give advice to parents on pertinent issues. Information is regularly sent home via email. This information includes, for example, Child Sexual Exploitation, app management and Online Protection (CEOP) updates.

Mental Health evenings are also run regularly for parents with a visiting speaker, usually a child psychologist, addressing various issues around child mental health and well-being. Up-to-date information on social media sites, online gaming and internet safety can be found on the [National Online Safety website](#).

Early Years Provision

- All staff are made aware that mobile telephones and cameras, whether they belong to the School or are personal devices, are not allowed to be used in the EYFS without express permission of the Headmaster or Head of Pre-Prep (See the EYFS Mobile Devices Policy). Staff who breach this may be subject to disciplinary action.
- Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Headmaster or Head of Pre-Prep.
- The school will inform Ofsted of any significant event which is likely to question the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.
- The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).
- Written confirmation is obtained that appropriate child protection checks are applied to any staff employed by another organisation, who are working with the School's pupils, both on the School site or on another site.

Boarding

Children may be particularly vulnerable in residential settings, especially with regards to possible sexual relationships between children. The requirements are set out in the [National Minimum Standards for boarding schools \(publishing.service.gov.uk\)](#) The Pilgrims' School monitors its policies and procedures in order to comply with these standards. All staff are aware of the need to be vigilant in a residential setting and, as appropriate, we will work closely with Hampshire Social Services and, where relevant, any local authorities that have placed their children here. The School's induction process for boarders covers the need for privacy in boarding, and pupils are reminded often of this requirement. Boarding staff are aware of the requirement to conduct bed checks at night to ensure that each boarder is in their own bed and safe.

Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. Previously looked after children remain especially vulnerable and the school will ensure that all staff have the skills, knowledge and understanding to keep previously looked after children safe.

Alternative Provision

Were a child to be placed with an alternative provision provider, the School would make sure it was satisfied that the provider met the needs of the pupil and obtain written confirmation from the alternative provider that appropriate safeguarding checks had been undertaken.

Homestays

Where children take part in exchange visits (either in the UK or abroad), the School will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay. This will include obtaining a DBS Enhanced certificate with Barred List information.

A Child in Need

If a decision is made to refer a child to Children's Social Care, this will normally be in consultation with the parents, unless doing so would put the child at risk of further harm. Inter-agency assessment using Hampshire Children's Services processes will then be instigated, involving the Signs of Safety assessment process, the Common Assessment Framework (CAF) and/or the 'Team Around the Child' (TAC) approaches.

Part 1: Safeguarding Concerns - Spotting and Managing

What is Abuse?

Abuse can be:

Physical

Emotional

Neglect

Sexual

Exploitation

Abuse: a form of maltreatment of a child either by inflicting harm or by failing to act to prevent harm. Abuse can be inflicted by people known or unknown to them, in a family, institutional, or community setting. Abuse can be online or in person. Abuse can be inflicted by both adults and children. 'Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.'

Indicators of abuse and neglect

Type	Indicators
Physical Abuse: a form of abuse which causes physical harm to a child. Including via hitting, shaking, throwing, poisoning, burning/scalding, drowning, or suffocating. Physical harm can also be caused by a parent or	<ul style="list-style-type: none">• Bruises – commonly on the head but also on the ear, neck or soft areas e.g. the abdomen, back or buttocks. Particularly:<ul style="list-style-type: none">○ Clusters of bruises on the upper arm, outside of thigh or on the body.○ Bruises with dots of blood under the skin.

<p>carer fabricating the symptoms of, or deliberately inducing, illness in a child.</p>	<ul style="list-style-type: none"> ○ A bruised scalp and swollen eyes from hair being pulled violently. ○ Bruises in the shape of a hand or object ● Defensive wounds commonly found on the forearm, upper arm, back of leg, hands or feet. ● Burns or scalds – can be from hot liquids, hot objects, flames, chemicals or electricity. Particularly look for: <ul style="list-style-type: none"> ○ A clear edge to a burn or scald. ○ Burns in the shape of an implement, for example, a cigarette burn. ○ Multiple burns or scalds. ● Bite marks – usually oval or circular in shape. <ul style="list-style-type: none"> ○ Indentations or bruising from individual teeth. ● Fractures or broken bones – fractures to the hips or leg bones in babies. <ul style="list-style-type: none"> ○ Multiple fractures or breaks at different stages of healing. ● Scarring – effects of poisoning such as vomiting, drowsiness or seizures. ● Respiratory problems from drowning, suffocating or poisoning.
<p>Emotional Abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development.</p> <p>This may include, but is not limited to:</p> <ul style="list-style-type: none"> ● Conveying to a child they are worthless, unloved or inadequate ● Not giving the child opportunities to express their views ● Making fun of how they communicate ● Imposing developmentally inappropriate expectations ● Overprotection to the extent that the child is prevented from participating in normal social interaction ● Overhearing/seeing the ill-treatment of another ● Causing a child to feel frightened 	<p>Babies and pre-school children who are being emotionally abused or neglected may:</p> <ul style="list-style-type: none"> ● Be overly affectionate towards strangers or people they haven’t known for very long. ● Lack confidence or become wary or anxious, not appear to have a close relationship with the parent, e.g. when being taken to or collected from nursery etc. ● Be aggressive or nasty towards other children and animals. <p>Older children may:</p> <ul style="list-style-type: none"> ● Use language, act in a way or know about things that you wouldn’t expect them to know for their age. ● Struggle to control strong emotions or have extreme outbursts. ● Seem isolated from their parents. ● Lack social skills or have few, if any, friends.
<p>Neglect: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect can occur during pregnancy (e.g. via substance abuse) or after birth.</p> <p>This may include, but is not limited, failing to:</p>	<p>Physical symptoms:</p> <ul style="list-style-type: none"> ● Be smelly or dirty. ● Have unwashed clothes. ● Have inadequate clothing e.g. not have a winter coat. ● Seem hungry or turn up to school having had no breakfast and with no lunch money. ● Have frequent and untreated nappy rash in infants.

<ul style="list-style-type: none"> • Provide adequate food, clothing or shelter • Protecting a child from abuse or danger • Providing sufficient supervision • Providing access to medical care • Meet the child’s emotional needs <p>Children suffering from neglect may be living in an unsuitable home environment, being left alone for a long time or taking on the role of carer for other family members.</p>	<p>Health and Developmental Symptoms:</p> <ul style="list-style-type: none"> • Untreated injuries, medical and dental issues. • Repeated accidental injuries caused by lack of supervision. • Recurring illnesses or infections. • Poor muscle tone or prominent joints. • Skin sores, rashes, fleabites or ringworm. • Poor language, communication or social skills. • Not being given required medicines and vaccinations.
<p>Sexual Abuse: involves forcing or enticing a child or young person to take part in sexual activities whether or not the child is aware of what is happening. It can be perpetrated by adults and children of any gender. It can occur online and in-person.</p> <p>Sexual activity can involve:</p> <ul style="list-style-type: none"> • Penetrative contact (e.g. rape or oral sex) • Non-penetrative contact (e.g. masturbation, kissing or rubbing) • Viewing sexual images or acts • Encouraging sexual behaviour 	<p>Behavioural Symptoms:</p> <ul style="list-style-type: none"> • Stay away from, or avoid being alone with, certain people. • Be frightened and/or be reluctant of socialising with a person • Show sexual behaviour inappropriate for their age: <ul style="list-style-type: none"> ○ Become sexually active at a young age. ○ They might be promiscuous. ○ Use sexual language or know information that you wouldn’t expect them to know. <p>Physical Symptoms:</p> <ul style="list-style-type: none"> • Anal or vaginal soreness • An unusual discharge • Sexually transmitted infection (STI) • Pregnancy
<p>Exploitation:</p> <p>Exploitation may include:</p> <ul style="list-style-type: none"> • Child sexual exploitation, for example grooming and online exploitation or ‘sexploitation’. • Criminal exploitation and gangs, for example being invited to parties or gatherings for the purpose of being coerced into taking drugs by adults or other perpetrators, and then being forced into sexual activity that may be violent, humiliating and degrading. 	<p>Possible evidence of child sexual exploitation:</p> <ul style="list-style-type: none"> • A sudden change in family relationships or dynamics • Having a lot of money or things they cannot or will not explain • Physical signs of abuse, especially in their genital or anal area • Sudden change in physical appearance, including clothes and hygiene levels • Alcohol and/or drug misuse • Sexually transmitted infections <p>Signs of criminal exploitation and involvement with gangs:</p> <ul style="list-style-type: none"> • Frequent absence from school and poor academic performance • Going missing from home, staying out late or travelling for unexplained reasons • In a relationship or spending a lot of time with someone older than them • Being constantly angry, aggressive or violent • Being isolated or withdrawn • Having unexplained money and buying new things

	<ul style="list-style-type: none"> • Wearing clothes and accessories in gang colours, or getting tattoos • Using new slang words • Spending more time on social media, or being secretive about time spent online • Making more calls or sending more texts, possibly on a new phone or phones • Self-harming or feeling emotionally unwell • Committing petty crimes like shoplifting or vandalism.
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Further information can be found at: <http://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

What Should Staff Do?

A. Immediate Danger

If staff (including Fellows, supply staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should immediately:

1. Speak to the DSL or, in their absence, a DDSL. The member of staff may make a referral direct to Children’s Social Care and/or the police themselves if they feel it appropriate and must immediately let the DSL know subsequently.
 - a. Parental consent is not needed for referrals to statutory agencies such as the Police and the MASH (Multi-Agency Safeguarding Hub). However, Pilgrims’ may wish to involve parents at the earliest opportunity unless doing so may place child at risk of harm.
2. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required.
3. Staff should challenge any inaction and follow this up with the DSL and Children’s Social Care.
4. All concerns, discussions and decisions made should be recorded on CPOMS

B. General Concerns

If any member of staff, or volunteer, has **any concerns** about any pupil or incident (as opposed to a child being in immediate danger) that touch upon safeguarding or child protection issues, they should log them on CPOMS within 24 hours, asking the DSL or DDSLs for advice if necessary. The safeguarding team will receive an email alerting them to the fact that a concern has been raised. Appropriate action and information sharing will then take place. Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of service provision.

It should be remembered that sometimes children will not feel ready or know how to tell someone they are being abused, exploited or neglected, or they may not recognise their experiences as harmful. Therefore, raising concerns early enables us to identify potential harm and implement early help where necessary.

Anyone can refer a child to Children’s Social Care if necessary. Fears regarding sharing information under the [Data Protection Act 2018](#) and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the DSL.

C. Early Help

There is a difference between having concerns about a child (for instance where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies) and a child being in immediate danger.

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help from a number of agencies, an early help inter-agency assessment should be arranged. Parental consent is required for this.

All staff should be aware that providing early help is more effective in promoting the welfare of children than reacting later. All staff should be aware of the early help process and understand their role which includes:

- Identifying emerging problems.
- Discussing early help requirements with the DSL.
- Sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. (This will always be with support from the DSL available.)

Staff should be aware that all boys may benefit from early help but that they should be particularly alert to the potential need for early help of a boy who:

- Has a Social Worker
- Is disabled and has specific educational needs.
- Has special educational needs (whether or not they have an EHCP (Educational Health Care Plan))
- Is a young carer.
- Is a privately fostered child.
- Has returned home to their family from care.
- Has family or community links with anti-social or criminal behaviour
Is in a challenging family circumstance e.g. substance abuse, adult mental health issues or domestic abuse.

A member of staff or volunteer who considers that a pupil may benefit from early help should, in the first instance, discuss this with the DSL. If early help is appropriate, the DSL should support the staff member by liaising with other agencies and setting up an inter-agency assessment as appropriate. The DSL should keep the case under constant review and consider referring the case to the Hampshire Children's Services if the child's situation does not improve. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

Responding to a Disclosure – the “6 R's Response”

If staff suspect, or hear, an allegation or complaint of abuse, or neglect, from a child or any third party, they must act immediately and follow the “6 R's” procedure below. Staff should not assume that someone else will take action and share information that might be critical in keeping children safe.

Receive → Reassure → React → Record → Refer → Reflect

Receive

- A) **Be available:** If a child wants to talk to you, never ask them to come back later; they may not be able to re-summon the will to do so.

- B) **Do not promise confidentiality:** Explain that you may have to pass the information on. Do not say, (until you are sure that the disclosure does not concern them) that you will need to tell the DSL. 'Some things are too important not to pass on,' can be a useful phrase. Use your professional judgement: you might ask the child if they mind if you make some rough, handwritten notes, but don't risk it if you think this may stop them disclosing. Any notes made within an hour of the conversation would be considered contemporaneous in a court of law
- C) **Listen to the child:** If you are shocked by what they tell you, try not to show it. Take what they say seriously. Children rarely lie about abuse (NSPCC statistics) and to be disbelieved adds to the traumatic nature of disclosing. Children may retract what they have said if they meet with revulsion or disbelief.

Reassure

- A) Stay calm and reassure the child that they have done the right thing in talking to you.
- B) **Be honest:** try not to say things like, "everything will be alright," when you aren't sure that they will be. Try to alleviate feelings of guilt by saying, "You are not to blame".
- C) **Acknowledge** how hard it must have been for the child to tell you.

React

- A) **Do not ask leading questions.** In fact, just let the child talk. If they stop, hesitate or need reassurance, an open 'and what happened...?' or 'is there anything else you would like to tell me?' will help. Even an acknowledging 'Mm-hm' can help them feel you are listening properly.
- B) **Never:** criticise, accuse or press the child. Never ask them to repeat the disclosure to another member of staff.
- C) **Explain** what you must do next and to whom you have to talk. Use your professional judgement at this point as to the degree of danger the child is in. Inform the DSL or a DDSL immediately.
- D) **Ask open-ended questions:** such as "Can you describe/explain to me...".

Record

- A) **Record onto CPOMS.** Ask for help from the DSL or a DDSL if needed.
- B) **Do not destroy original notes:** they may be required by a court.
- C) **What to record:** the date, time, place, any noticeable verbal or non-verbal behaviour and wherever possible use the words used by the child, indicating these as appropriate. Give details of what was said, by whom and in whose presence and then sign and date the document. Use the body outline on the disclosure form to indicate the position of any bruising.
- D) **Use the child's language:** If the child uses their own private sexual words, record the actual words used, rather than translating them into 'proper' words. Be objective in your recording: include statements and observable things rather than your interpretations or assumptions.
- E) **In sexual disclosures:** if possible, this should be managed with two members of staff present (one of them being the DSL or a DDSL).

Refer

- A) **Inform the DSL:** in the DSL's absence, a DDSL should be informed. In the highly unlikely event of no safeguarding lead being available, contact the local authority. Do this immediately.

Reflect

- A) **Checklist:** Use the 6Rs as a checklist

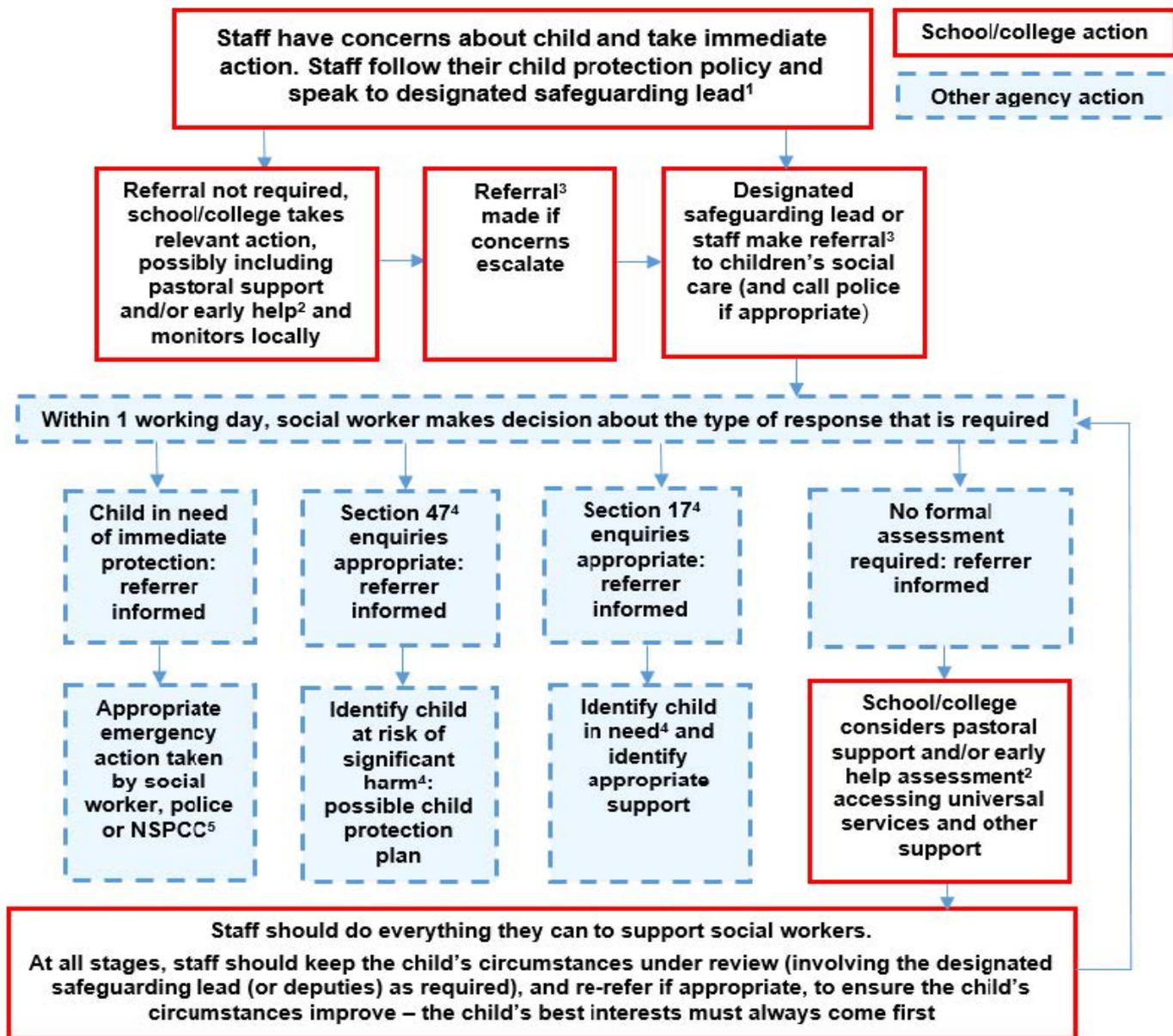
B) **Get support:** Receiving a disclosure can be upsetting. Without disclosing confidential information about the child, seek support either within the school or externally. The DSL can help you in this. Where there is a safeguarding concern, the school will ensure the pupil's wishes and feelings are taken into account when determining what action to take, and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence.

All concerns, discussions and decisions made, including the rationale for those decisions, must be recorded on CPOMS. These recordings should include instances where referrals were or were not made to another agency such as the Local Authority, Children's Services or the Prevent program. It should always be clear that action was taken by The School in each instance.

More information on best practices around managing disclosures of sexual abuse can be found here: <https://www.csacentre.org.uk/resources/key-messages/disclosures-csa/>

Referral Process Flow Diagram

This diagram illustrates what action should be taken, and who should take it, where there are concerns about a child.



Part 2 – High risk and emerging safeguarding issues

Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of our school. All staff, but especially the DSL and DDSLs should consider whether children are at risk of abuse or exploitation in situations outside their families. Risk and harm outside of the family can take a variety of different forms and children can be vulnerable to sexual exploitation, criminal exploitation, radicalisation and serious youth violence in addition to other risks.

As a school, we will consider the various factors that can impact the life of any pupil about whom we have concerns. We will consider the level of influence that these factors have on their ability to be protected and remain free from harm, particularly around child exploitation or criminal activity.

What life is like for a child outside the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns. We should be ready to act in the interests of **protecting children from maltreatment, whether that is within or outside the home, including online.**

Preventing Radicalisation and Extremism

As part of the Counter Terrorism and Security Act 2015, schools have a duty to ‘prevent people being drawn into terrorism’. This has become known as the ‘Prevent Duty’.

The Prevent Duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks include, but are not limited to, political, environmental, animal rights, or faith-based extremism that may lead to a child becoming radicalised. All staff have received Prevent training in order that they can identify the signs of children being radicalised.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

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

- verbalising anti-Western or anti-British views
- advocating violence towards others
- talking as if from a script and in a way that would have previously seemed very unlikely for the child

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation and the grooming of children can occur through many different methods, such as social media or the internet, and at different settings.

As part of the preventative process, resilience to radicalisation will be built through the promotion of Fundamental British Values through the curriculum.

Any child who is considered vulnerable to radicalisation will be referred by the DSL to Hampshire Children's Social Care, where the concerns will be considered in the MASH process. If the police Prevent Officer considers the information to be indicating a level of risk a "channel panel" will be convened and the School will attend, usually in the person of the DSL, and support this process.

What is Pilgrims' doing?

Training: Radicalisation and the Prevent Agenda is discussed in staff training. Staff are made aware of Prevent and their duty to have due regard to the need to prevent people from being drawn into terrorism.

Teaching: All boys are taught, through regular PSHE lessons, about Fundamental British Values, which enables them to challenge extremist ideas.

Risk Assessment: A Prevent risk assessment has been carried out and the staff are aware that they have a duty to look out for those signs which may indicate that a child (or children) are being drawn into terrorism or other extreme ideologies. Any changes in behaviour, or specific background factors, are taken into account.

Recognising Pilgrims' Faith: As a Christian institution, the Pilgrims' School seeks to present the Christian message in an inclusive way and recognises the importance of introducing pupils to different beliefs and cultures. It will not invite speakers who do not advocate the mutual respect and tolerance of those with different faiths and beliefs.

The Pilgrims' School has a duty under Prevent legislation to ensure that all visiting speakers are suitable and appropriately supervised. Visiting speakers will include individuals giving talks on academic subjects, pastoral matters and career guidance, as well as preachers in the Cathedral.

- All visiting speakers must be assessed for their suitability by the member of staff organising the talk/visit. This assessment may be a personal recommendation or online references, but some basic background research must be undertaken, and talks vetted in advance.
- The DSL will keep a record of visiting speakers attending The Pilgrims' School.
- Staff organising talks should email the DSL at least one week in advance of the visit, using the message header 'VISITING SPEAKER'; detailing the name and credentials of the speaker; and outlining the topic and broad content of the talk.
- Visiting speakers must be always accompanied and a staff member must be present during talks.
- Speakers attending on a regular basis, or who will not be accompanied, will be subject to vetting checks as set out in the School's Recruitment, Selection and Disclosures Policy and Procedures.

What Should Staff Do?

- If staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism, they must report to the DSL immediately or call the numbers listed at the beginning of the policy. This will be reported to Channel Police Practitioner or to the MASH. The School will play a full and active part in any supportive interventions that may be necessary.

Gender based violence / Violence against women and girls

The government has a strategy looking at specific issues faced by women and girls. Within the context of this safeguarding policy the following sections are how we respond to violence against girls: female genital mutilation, forced marriage, honour-based violence and teenage relationship abuse all fall under this strategy.

For more information, visit: <https://www.gov.uk/government/policies/violence-against-women-and-girls>

Even though The Pilgrims' School is an all-boys' school, staff should remain vigilant regarding the possibility of violence against women and girls within our community, especially since there are regular interactions between mothers and female siblings of boys in our care.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

FGM is illegal in the UK.

On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. 'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the DSL and/or Headmaster will be informed and **the member of teaching staff must call the police** to report suspicion that FGM has happened.

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

At no time will staff examine children to confirm concerns.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other safeguarding concern.

While FGM has a specific definition, there are other abusive cultural practices which can be considered harmful to women and girls. Breast ironing is one of five UN defined 'forgotten crimes against women'. It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, and hammers to delay the appearance of puberty. This practice is considered to be abusive and should be referred to children's social care.

Forced Marriage

In the case of children: 'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, *psychological, financial, sexual and emotional pressure.*' In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. is under 18.

It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local Police safeguarding team or children's social care.

Policies and practices in this school reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to pupils who may be at risk of forced marriage, teachers and school leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as Police officers or social workers.

Characteristics that may indicate forced marriage

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school/college, including truancy;
- a drop in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;

- a history of siblings leaving education to marry early;
- poor performance, parental control of income and students being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

[an alternative and fuller summary about the risk and impact of forced marriage on pupils can be found in the [multi-agency guidance of the forced marriage unit](#) page 32 - 36]

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 the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour-based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family
- are exploring their sexuality or identity

Women and girls are the most common victims of honour-based abuse however, it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

All forms of honour-based abuse are abusive (regardless of the motivation) and should be handled and escalated as such. If staff believe that a pupil is at risk or has already suffered from honour-based abuse, they will report to the DSL who will follow the usual safeguarding referral process; however, if it is clear that a crime has been committed or the pupil is at immediate risk, the Police will be contacted in the first

instance. It is important that, if honour-based abuse is known or suspected, communities and family members are NOT spoken to prior to referral to the Police or social care as this could increase risk to the child.

Teenage Relationship Abuse

Relationship abuse can take place at any age and describes unacceptable behaviour between two people who are in a relationship.

Research has shown that teenagers do not always understand what may constitute abusive and controlling behaviours, e.g., checking someone's 'phone, telling them what to wear, who they can/can't see or speak to or coercing them to engage in activities they are not comfortable with. The government campaign "disrespect nobody" provides other examples of abusive behaviour within a relationship.

This lack of understanding can lead to these abusive behaviours feeling 'normal' and therefore left unchallenged, as they are not recognised as being abusive.

In response to these research findings, the School will provide education to help prevent teenagers from becoming victims and perpetrators of abusive relationships, by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within their relationships. This will form part of the School's curriculum content in respect of Relationship Education.

If the School has concerns about a child in respect of relationship abuse, it will report those concerns in line with procedures to the appropriate authorities as a safeguarding concern, a crime or both.

Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment (SVSH) can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Within our school all staff receive training about sexual violence and sexual harassment and what to do if they have a concern or receive a report. Any and all concerns should be reported to the DSL. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. This pattern of prevalence will not, however, be an obstacle to ALL concerns being treated seriously.

This school has a **zero-tolerance to any form of child-on-child abuse** including but not limited to SVSH. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter', 'having a laugh' or 'boys being boys'.

We will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos; sexual jokes, comments or taunting either in person or on social media; or online sexual harassment.

We will follow the "Sexual violence and sexual harassment between children in schools and colleges" advice provided by the DfE.

We will challenge all contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing bottoms, or genitals, or pulling down trousers and impose appropriate levels of disciplinary action, to be clear that these behaviours are not tolerated or acceptable. Support will be provided to victims of sexual violence and sexual harassment, and we will ensure that they are kept safe.

It is clear from the 2021 Ofsted review into SVSH in schools and colleges that the prevalence of abusive and unwanted behaviour is widespread. As such staff in the school will remain vigilant and intervene early to prevent low level behaviours from becoming abusive experiences. Pupils and staff will be directed to the Lucy Faithfull Foundation's "Shore Space" where confidential support regarding sexual thoughts or behaviours can be sought.

All staff will maintain the attitude that **"It could happen here"**.

It is important that all staff are aware of the differing stages of sexualised awareness and development and staff can refer to the [Sexual Behaviours Traffic Light Tool](#) for further guidance.

Upskirting

In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal.

Upskirting is defined as someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Although this seems unlikely in a school with no girls, it is conceivable (if incredibly unlikely) that an incident might occur with a boy in a dressing gown and/or with a towel around his waist. If staff become aware that

upskirting has occurred, this will be treated as a sexual offence and reported accordingly to the DSL and onwards to the police.

Behaviours that would be considered as sexual harassment which may be pre-cursors to upskirting, such as the use of reflective surfaces or mirrors to view underwear or genitals, will not be tolerated and the school will respond to these with appropriate disciplinary action and education.

Pupils who place themselves in positions that could allow them to view underwear, genitals or buttocks, will be moved on. Repeat offenders will be disciplined. These locations could include stairwells, under upper floor walkways, outside changing areas and toilets or sitting on the floor or laying down in corridors.

If technology that is designed for covert placement and could be used to take upskirting or indecent images is discovered in the School, it will be confiscated. If the technology is in location and potentially may have captured images, this will be reported to the police and left in situ so that appropriate forensic measures may be taken to gather evidence.

Any confiscated technology will be passed to the Headmaster to make a decision about what happens to the items. This will be carried out under the principles set out in the government guidance on [searching, screening and confiscation](#).

If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed.

Initiation/Hazing

Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

Hazing is seen in many different types of social groups, including gangs, sports teams and school groups. The initiation rites can range from relatively benign pranks, to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct. Hazing may include physical or psychological abuse. It may also include nudity or sexual assault.

The Trigger Trio

The term 'Trigger Trio' has replaced the previous phrase 'Toxic Trio' which was used to describe the issues of domestic abuse, mental ill-health and substance misuse which have been identified as common features of families where harm to adults and children has occurred.

The Trigger Trio are viewed as indicators of increased risk of harm to children and young people. In an analysis of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the triggers were present. These factors will have a contextual impact on the safeguarding of children and young people.

Domestic Abuse

The Domestic Abuse Act 2021 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 towards must be aged 16 or over and they must be “personally connected”.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. 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.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

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

- being withdrawn
- suddenly behaving differently
- anxiety
- being clingy
- depression
- aggression
- problems sleeping
- eating disorders
- bed wetting
- soiling clothes
- excessive risk taking
- missing school
- changes in eating habits
- obsessive behaviour
- experiencing nightmares
- taking drugs
- use of alcohol
- self-harm
- thoughts about suicide

These behaviours themselves do not indicate that a child is living with domestic abuse but should be considered as indicators that this may be the case.

If staff believe that a child is living with domestic abuse, this will be reported to the DSL for referral, to be considered by Children’s Social Care.

Parental Substance Misuse

Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them’.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

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

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

These behaviours themselves do not indicate that a child's parent is misusing substances but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to Children's Social Care to be considered.

Young Carers

As many as 1 in 12 children and young people provide care for another person. This could be a parent, a relative or a sibling and for different reasons such as disability, chronic illness, mental health needs, or adults who are misusing drugs or alcohol.

Pupils who provide care for another are Young Carers. These young people can miss out on opportunities, and the requirement to provide care can impact on school attendance or punctuality, limit time for homework, leisure activities and social time with friends.

We may refer a young carer to Children's Social Care for a carers assessment to be carried out. We will consider support that can be offered and make use of the resources and guidance from Save the Children in their young carers work.

Missing, Exploited and Trafficked Children (MET)

Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or are being exploited; or who are at risk of or are being trafficked. Given the close links between all these issues, there has been a considered response to view them as potentially linked, so that cross over of risk is not missed.

Children Missing from Education

Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns. There should also be enough professional curiosity to explore whether there are any **unexplained and/or persistent absences**, and an effort to **understand the causes of children missing education**.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the School's unexplained absence and children missing from education procedures.

The School will follow the Statutory Guidance set out in "Working Together to Improve School Attendance (2024)" and address repeated absenteeism proactively.

The safeguarding team and staff should consider:

Missing lessons: Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the pupil remain on the school site or are they absent from the site?

- Is the pupil being exploited during this time?
- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other pupils routinely missing the same lessons and does this raise other risks or concerns such as SVSH between pupils, exploitation, gang behaviour or substance misuse?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

Single missing days: Is there a pattern in the day missed? Is it before or after the weekend suggesting the pupil is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing the School of the absence on the day? Are missing days reported back to parents to confirm their awareness?

- Is the pupil being sexually exploited during this day?
- Is the pupil avoiding abusive behaviour from peers or staff on this day?
- Do the parents appear to be aware and are they condoning the behaviour?
- Are the pupil's peers making comments or suggestions as to where the pupil is?
- Can the parent be contacted and made aware?

Continuous missing days: Has the School been able to make contact with the parent(s)? Is medical evidence being provided? Are siblings attending School (either our or local schools)?

- Did we have any concerns about radicalisation, , forced marriage, honour- based violence, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?
- Does the parent have any known medical needs? Is the pupil safe?

What is Pilgrims' doing?

- The School will view absence as both a safeguarding issue and an educational outcomes issue. The School monitors attendance regularly. The School may take steps that could result in legal action for attendance, or a referral to Children's Social Care, or both. Where reasonably possible, the School holds more than one contact number for each pupil to provide us with additional options to make contact with a responsible adult when a pupil missing education is also identified as a welfare and/or safeguarding concern.
- The School will take advice from the appropriate authority when a pupil fails to attend school regularly or has been absent, without the School's permission, for a period of 10 school days or more. This may be continuous or sporadic in nature.
- If a pupil goes missing from education, staff should also raise their concerns immediately with the DSL.

Children Missing from Home or Care

It is known that children who go missing are at risk of suffering significant harm, and there are specific risks around children running away and the risk of sexual exploitation.

The Hampshire Police Force, as the lead agency for investigating and finding missing children, will respond to children going missing based on on-going risk assessments in line with current guidance.

The police definition of 'missing' is: "Anyone whose whereabouts cannot be established will be considered as missing until located, and their well-being or otherwise confirmed."

Various categories of risk should be considered, and Hampshire Local Safeguarding Children's Partnership provides further guidance:

Local authorities have safeguarding duties in relation to children missing from home and should work with the police to risk assess and analyse data for patterns that indicate concerns and risks. The police will prioritise all incidents of missing children as medium or high risk. Where a child is recorded as being absent, the details will be recorded by the police, who will also agree review times and any on-going actions with person reporting.

A missing pupil incident would be prioritised as 'high risk' where:

- the risk posed is immediate and there are substantial grounds for believing that the pupil is in danger through their own vulnerability; or
- the pupil may have been the victim of a serious crime; or
- the risk posed is immediate and there are substantial grounds for believing that the public is in danger.

The high-risk category requires the immediate deployment of police resources.

Authorities need to be alert to the risk of sexual exploitation or involvement in drugs, gangs or criminal activity, trafficking and to be aware of local "hot spots", as well as concerns about any individuals with whom children might runaway.

Safeguarding procedures must be initiated in collaboration with Children's Social Care Services whenever there are concerns that a pupil who is missing may be suffering, or likely to suffer, significant harm.

Within any case of a pupil who is missing, both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Trigger Trio (domestic abuse, parental mental ill health and parental substance misuse)

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum-seeking children, there will be pressure to make contact with their trafficker.

We will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them or do so ourselves with urgency.

Child Sexual Exploitation (CSE)

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

Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

- Exploitation can be isolated (one-on-one) or organised group/criminal activity
- There can be a big age gap between victim and perpetrator, but it can also be child-on-child
- Boys can be targeted just as easily as girls – this is not gender specific
- Perpetrators can be women and not just men
- Exploitation can be between males and females or between the same genders

Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or school, children involved in crime, children with parents/carers who have mental health problems, learning difficulties/other issues, children who associate with other children involved in exploitation. However, it is important to recognise that any child can be targeted.

Indicators of child sexual exploitation may include:

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

- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

(Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.)

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

[Child sexual exploitation: Definition and a guide for practitioners \(DfE 2017\)](#)

CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

We educate all staff in the signs and indicators of sexual exploitation. Children who have been exploited will need additional support to help maintain them in education. We use the child exploitation risk assessment form (CERAF) and associated guidance from the Hampshire Safeguarding Children Partnership to identify pupils who are at risk; the DSL will share this information as appropriate with children's social care.

We recognise that we may have information or intelligence that could be used to both protect children and prevent risk. Any relevant information that we have will be shared on the community partnership information (CPI) form which can be downloaded from <https://www.safe4me.co.uk/portfolio/sharing-information/>

Action to be taken where there is an allegation about child-on-child abuse or sexual violence and/or harassment:

The safety and the well-being of the child being harmed is paramount and therefore the first priority is to ensure their safety – physical safety or emotional well-being – and minimise the possibility of further abuse. Police may be informed at the outset of any harmful sexual behaviours, such as grabbing bottoms or

genitalia, which are potentially criminal in nature. Rape, assault by penetration and sexual assaults will be passed to the police.

Careful consideration will be given to the appropriate response to any report of child-on-child sexual violence and/or sexual harassment. This will involve a risk and needs assessment and take into account the nature of the alleged incident (including whether a crime may have been committed), the ages of the children involved, any power imbalance between the children, whether the incident is a one-off or sustained pattern, the on-going risks present and other related issues and the wider context.

The risk and needs assessment should consider:

- The child being harmed
- The child harming others
- The other children (and, if appropriate staff) at the school

Risk Management Plans (Safety Plans) will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure anyone who has been harmed that they are being taken seriously and that they will be supported and kept safe.

This may necessitate separating the individuals being harmed and causing harm from any classes they share.

The individual who has disclosed harmful sexual behaviour will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor would the boy being harmed ever be made to feel ashamed for making a report.

Cases requiring special action within school and possible intervention by Children's Social

Care services

If the nature of the concern is serious but it is not felt that there is immediate danger to the physical or emotional well-being of the victim, then the School will initiate a more extensive series of interventions designed to safeguard those being harmed, deal effectively with those engaging with harmful behaviour and resolve conflict.

Such concerns are likely to be social bullying and exclusion. This is often a complex issue and can involve a number of pupils, and it can often be the case that children are, at various times, both engaged in and harmed by abusive behaviour themselves. The principles set out in the anti-bullying policy apply here but, in addition, there may be a need for:

- Closer and more regular monitoring
- The involvement of parents
- Special staff briefings to ensure that all staff are aware of the issues and what action is required
- The use of trusted adults and advisors for particular children or groups of children – both victims and those engaged in harmful behaviour
- The use of monitored peer mentoring
- The use of professional counsellors or behaviour management specialists to assist with strategies
- The application of internal exclusion, fixed term external exclusion (suspension) and permanent exclusion
- All actions taken must be recorded and dated. If serious issues persist and are not resolved and it is felt that there is a serious threat to the well-being or health of any individual or group of individuals,

then referral must be made to Children's Social Care services. Advice will always be sought from the MASH advisors.

- At The Pilgrims' School, we recognise that our response to boy-on-boy sexual violence and sexual harassment has to be as equally robust as it would be for sexual violence and sexual harassment between children of the opposite sex.

Child Criminal Exploitation (including "County Lines")

Child Criminal Exploitation (CCE) is defined as: 'where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 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 threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can occur through the use of technology'

Children under the age of criminal responsibility (10 years old), or young people who have increased vulnerability due to push-pull factors who are manipulated, coerced or forced into criminal activity, provide opportunity for criminals to distance themselves from crime.

It is important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

A current trend in criminal exploitation of children and young people is 'county lines', which 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". An order is placed on the number and typically a young person will deliver the drugs to the specified address and collect the money for the deal. These lines are owned and managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation, as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Indicators that a child may be criminally exploited include:

- Increase in **unexplained absence**
- Having unexplained amounts of money, **new high-cost items** and multiple mobile phones
- Increased social media and phone/text use, almost always secretly
- **Older males** in particular seen to be hanging around and driving
- Having injuries that are unexplained and being unwilling to have them looked at
- Increase in aggression, violence and fighting
- Carrying **weapons** – knives, baseball bats, hammers, acid
- Travel receipts that are unexplained
- **Significant missing** from education and disengaging from previous positive peer groups
- Association with other young people involved in exploitation
- Children who misuse drugs and alcohol
- Parent concerns and significant changes in behaviour that affect emotional wellbeing

We will treat any child who may be criminally exploited as a victim in the first instance and using the CERAF form and guidance in our referral to Children's Social Care. If a referral to the police is also required, as

crimes have been committed on the School premises, these will also be made. Children who have been exploited will need additional support to help maintain them in education.

If there is information or intelligence about child criminal exploitation, we will report this to the police via the community partnership information form. <https://www.safe4me.co.uk/portfolio/sharing-information/>

Serious Violence

Serious violence is becoming a factor for those who are involved in criminal exploitation. It can also be an indication of gang involvement and criminal activity.

All staff will be made aware of indicators, which may signal that pupils, or members of their families, are at risk from or involved with serious violent crime.

These indications can include but are not limited to: increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm; significant change in wellbeing; signs of assault; unexplained injuries; unexplained gifts and/or new possessions; possession of weapons.

Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Advice for staff can be found in in the Home Office's [Preventing youth violence and gang involvement](#).

We have a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions.

We will report concerns of serious violence to Police and social care.

If there is information or intelligence about potential serious violence, we will report this to the police via the community partnership information form: <https://www.safe4me.co.uk/portfolio/sharing-information/>

Trafficked Children and Modern Slavery

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.

Human trafficking is defined by the UNHCR (United Nations High Commissioner for Refugees) in respect of children as a process that is a combination of:

- Movement (including within the UK)
- Control, through harm / threat of harm or fraud
- For the purpose of exploitation

Any child transported for exploitative reasons is considered to be a trafficking victim.

There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

There are several indicators which suggest that a child may have been trafficked into the UK and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history of going missing and unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported.

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation/the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy / disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child or young person has no known links; and/or
- Possible inappropriate use of the internet and forming online relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked but should be considered as indicators that this may be the case.

When considering modern slavery, there is a perception that this is taking place overseas. The government estimates that tens of thousands of slaves are in the UK today.

Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods may have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

If staff believe that a child is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

Child Abduction

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. Further information is available at: www.actionagainstabduction.org

When we consider who is abducted and who abducts

- Nearly three-quarters of children abducted abroad by a parent are aged between 0 and 6 years-old
- Roughly equal numbers are boys and girls
- Two-thirds of children are from minority ethnic groups.
- 70% of abductors are mothers. The vast majority have primary care or joint primary care for the child abducted.
- Many abductions occur during school holidays when a child is not returned following a visit to the parent's home country (so-called 'wrongful retentions')

If we become aware of an abduction, we will follow the HIPS Hampshire, Isle of Wight, Portsmouth and Southampton procedure and contact the police and children's social care (if they are not already aware) If we are made aware of a potential risk of abduction, we will seek advice and support from the police and children's social care to confirm that they are aware and seek clarity on what actions we are able to take.

Returning home from care

When children are taken into care, consideration may be given in the future to those children being returned to the care of their parents, or one of their parents. Other children are placed in care on a voluntary basis by the parents and they are able to remove their voluntary consent.

While this is a positive experience for many children who have returned to their families, for some there are different challenges and stresses in this process.

As a school, if we are aware of one of our pupils who is looked after is returning to their home, we will consider what support we can offer and ensure as a minimum that the pupil has a person, that they trust, who they can talk to or share their concerns with.

Online Safety and Technology

Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. The advent of generative AI products presents many useful educational opportunities, and careful thought needs to be given to using this technology constructively, and in a manner that prepares children for the real world. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk (known as the 4C's):

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, misinformation, disinformation (which includes fake news), conspiracy theories, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying); and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

When it comes to the use of generative AI products, the School will endeavour to:

- effectively and reliably prevent access to harmful and inappropriate content by users;
- maintain robust activity logs, either by the Generative AI product itself or additional technology;
- be secured against malicious use or expose to harm;
- prioritise transparency and child safety in its design and be operated with accountability; and
- respect data protection and intellectual property laws.

Online Safety and Social Media

With the current speed of online change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting, nudes and semi-nudes
- 'sexploitation'
- digital footprint
- accessing and generating inappropriate content

What is Pilgrims' doing?

The School seeks to provide information and awareness to both pupils and their parents through:

- Acceptable use agreements for pupils, teachers, parents/carers and governors
- Curriculum activities involving raising awareness around staying safe online – these are covered specifically in IT and in PSHEe
- Information included in letters, newsletters, website
- Parents evenings / sessions
- High profile events / campaigns e.g., Safer Internet Day
- Building awareness around information that is held on relevant websites and or publications.

When managing disclosures, we refer to the following government guidance.

Cyberbullying

Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself.’

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile phones
- The use of mobile phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites or using apps, e.g. blogs, personal websites, social networking services
- Using e-mail or messaging services to message others
- Hijacking/cloning online accounts
- Making threatening, abusive, defamatory or humiliating remarks in online forums

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.

Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

What is Pilgrims’ doing?

Central to the School’s Anti-Bullying Policy is the principle that ***‘bullying is always unacceptable’*** and that *‘all pupils have a right not to be bullied’*.

The School also recognises that it must take note of bullying perpetrated outside school which has an impact within the School; therefore, once aware we will respond to any cyber-bullying carried out by pupils when they are away from the site.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. The School will pass on information to the police if it feels that it is appropriate or is required to do so.

Sexting, Youth Produced Sexual Imagery (YPSI), Nudes and Semi-Nudes

Sharing nudes and semi-nudes (youth produced sexual imagery) is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. It also includes underwear shots, sexual poses and explicit text messaging.

While this often takes place in a consensual relationship between two young people, the use of sexual images in revenge following a relationship breakdown is becoming more commonplace. This can also be used as a form of sexual exploitation and take place between strangers.

As the average age of first smartphone or camera-enabled tablet usage for a child is 6 years old, this is an issue that requires awareness raising across all ages.

What is Pilgrims' doing?

The School will use age-appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the School for advice.

- When an incident involving YPSI comes to the School's attention, the incident should be referred to the DSL as soon as possible. The DSL will then hold an initial review meeting with appropriate school staff. Where illegal images are involved, staff will avoid viewing them wherever possible and make sure they are not forwarded on. They should not be deleted until an assessment has been carried out, as the incident may require further investigating by the police. Further guidance is available from the UK Council for Internet safety: [UK Council for Internet Safety](#)
- There may be subsequent interviews with the pupil(s) involved (if appropriate) and parents will be informed at an early stage in the process, unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process, if there is concern a young person has been harmed, or is at risk of harm, a referral will be made to the MASH.
- The discovery of a YPSI or sexting incident may require the School's disciplinary process to commence. Each case will be looked at individually, as the School may decide to respond to the incident without involving the police.

Other Online Safety Issues

Online sexual abuse

As a school we will:

- **Report** to the Police, CEOP or any other relevant body any online sexual abuse or harmful content we are made aware of. This could include sending abusive, harassing and misogynistic messages; sharing nude and semi-nude images and videos; and coercing others to make and share sexual imagery. We will seek guidance from the NPCC '[when to call the Police](#)' document and the internet watch foundations '[report harmful content](#)' website
- **Educate** to raise awareness of what online sexual abuse is, how it can happen, how to limit the impact and what to do if you become aware of it.
- **Support** victims of online abuse within the school community

Gaming

Online gaming is an activity in which the majority of children and many adults get involved. The School will raise awareness:

- By talking to parents and carers about the games their children play and help them identify whether they are appropriate
- By supporting parents in identifying the most effective way to safeguard their children by using parental controls and child safety mode
- By talking to parents about setting boundaries and time limits when games are played
- By highlighting relevant resources such as the National Online Safety document

Online reputation

Grooming

Online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm, or intentionally cause harm to the child entirely online.

Additionally, to being targeted for sexual motivations, some young people are also groomed online for exploitation or radicalisation. While the drivers and objectives are different, the actual process is broadly similar to radicalisation, with the exploitation of a person's vulnerability usually being the critical factor. Those who are targeted are often offered something ideological, such as an eternal spiritual reward, or sometimes something physical, such as an economic incentive, that will make them 'feel better' about themselves or their situation.

Anyone can be at risk. Age, social standing and education do not necessarily matter as much as we previously thought, and we have seen all kinds of people become radicalised, from young men and women with learning difficulties to adults in well-respected professions. What is clear is that, the more vulnerable the person, the easier it is to influence their way of thinking.

Signs of grooming can include:

- isolating themselves from family and friends;
- becoming secretive and not wanting to talk or discuss their views;
- closing computers down when others are around;
- refusing to say who they are talking to; using technology such as anonymous browsing to hide their activity; and
- sudden changes in mood, such as becoming angry or disrespectful.

Of course, none of these behaviours necessarily mean someone is being radicalised and, when displayed, could be a symptom of bullying or other emotional issues.

Online Safety in the Curriculum

Teaching: Internet safety is an integral part of the school's IT curriculum and also embedded in PSHEe.

Programmes: The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate materials online (including AI generated material). These systems aim to reduce the risk of children being subjected to harmful online interactions with others and help manage online behaviour that can increase a child's likelihood of causing or experiencing harm. The School's filtering system is checked daily by the IT Manager and/or the wider safeguarding team and any inappropriate searches are investigated.

Further information can be found in the school's IT policies. This also includes the school's arrangements to ensure that children are safe from terrorist and extremist materials.

Building Awareness: The School will build awareness amongst pupils and parents about ensuring that a pupil:

- Only has friends online that they know in real life
- Is aware that if they communicate with somebody that they have met online, that relationship should stay online.

The School will support parents to:

- Recognise the signs of grooming
- Have regular conversations with their children about online activity and how to stay safe online

The School will raise awareness by:

- Running sessions for parents
- Including awareness of grooming as part of their curriculum
- Identifying with parents and children how they can be safeguarded against grooming.

Part 3 – Safeguarding issues relating to individual pupil needs

Homelessness

We recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The impact of losing a place of safety and security can affect a child's behaviour and attachments.

In line with the Homelessness Reduction Act 2017, this school will promote links into the Local Housing Authority for the parent or care giver in order to raise/progress concerns at the earliest opportunity.

We recognise that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Children and the Court System

We recognise that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a stressful experience and therefore the school will aim to support children through this process.

Along with pastoral support, the school will use age-appropriate materials published by HM Courts and Tribunals Services (2017) that explain to children what it means to be a witness, how to give evidence and the help they can access.

We recognise that making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. This school will support children going through this process.

Alongside pastoral support this school will use online materials published by The Ministry of Justice (2018) which offers children information & advice on the dispute resolution service.

These materials will also be offered to parents and carers if appropriate.

Children with family members in prison

Children who have a family member in prison are at greater risk of poor outcomes including poverty, stigma, isolation and poor mental health.

This school aims to:

- understand and respect the child's wishes. We will respect the child's wishes about sharing information. If other children become aware, the School will be vigilant to potential bullying or harassment
- keep as much contact as possible with the parent/caregiver.

We will maintain good links with the remaining caregiver in order to foresee and manage any developing problems. Following discussions, we will develop appropriate systems for keeping the imprisoned caregiver updates about their child's education.

- be sensitive in lessons. This school will consider the needs of any child with an imprisoned parent/caregiver during lesson planning.
- Provide extra support. We recognise that having a parent in prison can attach a real stigma to a child, particularly if the crime is known and serious. We will provide support and mentoring to help a child work through their feelings on the issue.

Alongside pastoral care, the School will use the resources provided by the National Information Centre on Children of Offender in order to support and mentor children in these circumstances.

Pupils with medical conditions

In School

There is a separate policy and procedure which should be read in conjunction with this (Administration of Medicine). We will ensure that sufficient staff are trained to support any pupil with a medical condition. Boarding Staff who administer medication are expected to complete the Administering Medication training.

All relevant staff will be made aware of the condition to support the pupil and be aware of medical needs and risks to them. An individual healthcare plan may be put in place to support the pupil and their medical needs. This is circulated and updated by the Lead Nurse as appropriate.

Out of School

There will be occasions when pupils are temporarily unable to attend our school on a full-time basis because of their medical needs. These pupils are likely to be:

- pupils suffering from long-term illnesses
- pupils with long-term post-operative or post-injury recovery periods
- pupils with long-term mental health problems (emotionally vulnerable).

Where it is clear that an absence will be for more than 15 continuous school days, the Education and Inclusion branch of Children's Services will be contacted to advise on the pupil's education.

Special Educational Needs and Disabilities (SEND)

Children who have special educational needs and/or disabilities can have additional vulnerabilities when recognising abuse and neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for a disproportionate impact on children with SEND, for example by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- Having fewer outside contacts than other children
- Receiving intimate care from a considerable number of carers, which may increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries
- Having an impaired capacity to resist or avoid abuse
- Having communication difficulties that may make it difficult to tell others what is happening
- Being inhibited about complaining for fear of losing services
- Being especially vulnerable to bullying and intimidation

- Being more vulnerable than other children to abuse by their peers.

What is Pilgrims' doing?

- Making it common practice to enable pupils with disabilities to make their wishes and feelings known in respect of their care and treatment
- Ensuring disabled pupils receive appropriate personal, health and social education (including sex and relationships education)
- Ensuring disabled pupils know how to raise concerns and give them access to a range of adults with whom they can communicate. This could mean using interpreters and facilitators who are skilled in using the pupil's preferred method of communication
- Recognising and utilising key sources of support including staff in schools, friends and family members where appropriate
- Developing the safe support services that families want, and a culture of openness and joint working with parents and carers on the part of services
- Ensuring that guidance on good practice is in place and being followed in relation to: intimate care; working with pupils of the opposite sex; managing behaviour that challenges families and services; issues around consent to treatment; anti-bullying and inclusion strategies; sexuality and safe sexual behaviour among young people; monitoring and challenging placement arrangements for young people living away from home.

Intimate and personal care

'Intimate Care' can be defined as care tasks of an intimate nature, associated with bodily functions, bodily products and personal hygiene, which demand direct or indirect contact with, or exposure of, the sexual parts of the body. The Intimate Care tasks specifically identified as relevant include:

- Dressing and undressing (underwear)
- Helping someone use the toilet
- Changing continence pads (faeces/urine)
- Bathing / showering
- Washing intimate parts of the body
- Changing sanitary wear
- Inserting suppositories
- Giving enemas
- Inserting and monitoring pessaries.

'Personal Care' involves touching another person, although the nature of this touching is more socially acceptable. These tasks do not invade conventional personal, private or social space to the same extent as Intimate Care. Those Personal Care tasks specifically identified as relevant here include:

- Skin care/applying external medication
- Feeding
- Administering oral medication
- Hair care
- Dressing and undressing (clothing)
- Washing non-intimate body parts
- Prompting to go to the toilet.

Personal Care encompasses those areas of physical and medical care that most people carry out for themselves but which some are unable to do because of disability or medical need. Children and young people may require help with eating, drinking, washing, dressing and toileting.

What is Pilgrims' doing?

Where Intimate Care is required, we will follow the following principles:

1. **Involve the pupil in the intimate care:** Try to encourage a pupil's independence as far as possible in his or her intimate care. Where a situation renders a pupil fully dependent, talk about what is going to be done and give choices where possible. Check your practice by asking the pupil or parent about any preferences while carrying out the intimate care.
2. **Treat every pupil with dignity and respect and ensure privacy appropriate to the pupil's age and situation:** Staff can administer intimate care alone however we will be aware of the potential safeguarding issues for the pupil and member of staff. Care should be taken to ensure adequate supervision primarily to safeguard the pupil but also to protect the staff member from potential risk.
3. **Be aware of your own limitations:** Only carry out activities you understand and with which you feel competent. If in doubt, ASK. Some procedures must only be carried out by members of staff who have been formally trained and assessed.
4. **Promote positive self-esteem and body image:** Confident, self-assured pupils who feel their body belongs to them are less vulnerable to sexual abuse. The approach you take to intimate care can convey lots of messages to a pupil about their body worth. Your attitude to a pupil's intimate care is important. Keeping in mind the pupil's age, routine care can be both efficient and relaxed.
5. **If you have any concerns, you must report them:** If you observe any unusual markings, discolouration or swelling, report it immediately to the designated practitioner for child protection. If a pupil is accidentally hurt during the intimate care or misunderstands or misinterprets something, reassure them, ensure their safety and report the incident immediately to the DSL. Report and record any unusual emotional or behavioural response by the pupil. A written record of concerns must be made available to parents and kept in the pupil's safeguarding record in CPOMS.
6. **Helping through communication:** There is careful communication with each pupil who needs help with intimate care in line with their preferred means of communication (verbal, symbolic, etc.) to discuss the pupil's needs and preferences. The pupil is aware of each procedure that is carried out and the reasons for it.
7. **Support to achieve the highest level of autonomy:** As a basic principle, pupils will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each pupil to do as much for themselves as they can. This may mean, for example, giving the pupil responsibility for washing themselves. Individual intimate care plans will be drawn up for particular pupils as appropriate to suit their circumstances. These plans include a full risk assessment to address issues such as moving and handling, personal safety of the child and the carer and health.

Perplexing presentations (PP) / Fabricated or induced illness (FII)

The Royal College of Paediatrics and Child Health have added the term "Perplexing presentations" to the guidance around FII.

Perplexing Presentations (PP) has been introduced to describe those situations where there are indicators of possible FII which have not caused or brought on any actual significant harm.

It is important to highlight any potential discrepancies between reports, presentations of the child and independent observations of the child. What is key to note are implausible descriptions and/or unexplained findings and/or parental behaviour.

There are three main ways that a parent/carer could fabricate or induce illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents
- induction of illness by a variety of means.

If we are concerned that a child may be suffering from fabricated or induced illness, we will follow the HIPS (Hampshire, Isle of Wight, Portsmouth and Southampton) protocol and inform children's social care.

Sexual Orientation, Identity and Gender Questioning Children

The NSPCC defines sexual orientation as being about who someone feels physically and emotionally attracted to. This can be romantic or emotional attraction, or both. LGBTQ+ stands for lesbian, gay, bisexual, transgender, queer or gender questioning (under review) and more. Although people often confuse them, it's important to remember that gender identity is different from sexuality.

It is natural for children to show curiosity about sex or the changes that happen during puberty. Many young people also feel unsure about their sexuality, identity or who they're attracted to, or find that this changes over time.

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. We endeavour to reduce the additional barriers faced by offering a safe space for them to speak to tutors, houseparents, the safeguarding team, Director of Wellbeing or any other adult at the School with whom they feel comfortable.

When supporting a gender questioning pupil, we shall take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have broader vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We shall also consider the broad range of individual needs, in partnership with parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We shall also include any clinical advice available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

Mental Health

Form tutors and class teachers see their pupils day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with their mental health and emotional wellbeing. All staff should also be aware that mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation.

The balance between the risk and protective factors is most likely to be disrupted when difficult events happen in pupils' lives. These include:

- **loss or separation** – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the pupil having to live elsewhere, being taken into care or adopted
- **life changes** – such as the birth of a sibling, moving house or changing schools or during transition from prep to senior school.
- **traumatic events** such as abuse, domestic abuse, bullying, violence, accidents, injuries or natural disaster.

When concerns are identified, staff will provide opportunities for the child to talk or receive support within the School environment. Parents will be informed of the concerns and a shared way to support the pupil will be discussed.

Where the needs require additional professional support, referrals will be made to the appropriate team or service with the appropriate agreement.

If staff have a mental health concern about a pupil that is also a safeguarding concern, they will take immediate action, raising the issue with the DSL or a DDSL.

Parental mental health

The term 'mental ill health' is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent's/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children, the impact of poor parental mental health can include:

- The parent's/carer's needs or illnesses taking precedence over the child's needs
- The child's physical and emotional needs being neglected
- The child acting as a young carer for a parent or a sibling
- The child having restricted social and recreational activities
- The child finding it difficult to concentrate, potentially having an impact on educational achievement
- The child missing school regularly as (s)he is being kept home as a companion for a parent/carer
- The child adopting paranoid or suspicious behaviour as they believe their parent's delusions
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child.

If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to Children's Social Care.

What is Pilgrims' doing?

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. At The Pilgrims' School, all referrals come to the Director of Wellbeing and from there the information is discussed, and support planned and instigated. Whilst staff are not trained to diagnose mental health conditions, some have a great deal of experience in this area. Many teaching staff at The Pilgrims' School are trained as Mental Health First Aiders (MHFA). The boy may benefit from seeing a school counsellor but mostly they are signposted to their GP, CAMHS or to a local private service.

Part 4 – Other safeguarding issues that may potentially have an impact on pupils

Bullying

The School has a separate anti-bullying policy. We maintain an attitude of zero tolerance to bullying and will treat each incident sensitively and proactively. This includes the wishes of the victim, working with the perpetrator and also with witnesses or bystanders.

There is no legal definition of bullying, but it is usually defined as repeated behaviour which is intended to hurt someone either emotionally or physically and is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability. Therefore, the School has a duty to educate all involved and the larger community while being aware of protected characteristics and the context within which bullying may occur. There is also the consideration of 'intention', 'repetition' and the level of the behaviour towards a victim.

In order to help clarify what constitutes bullying, the School recognises that there are instances where incidents occur that we would not class as bullying (bullying-type behaviour) as they are either isolated, or there has been a large enough gap between incidents.

In helping pupils understand behaviour we consider 4 different levels and ask is the incident:

1. Thoughtlessness
2. Unkindness
3. Meanness
4. Bullying

By working quickly and proactively, we would not expect to reach level 4, although repetition could in some cases mean that all the above could be classed as bullying.

Prejudice-based abuse

Prejudice-based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice-based on a person's real or perceived protected characteristics as defined by [Equality Act 2010](#):

- Age
- Disability
- Race
- Religion and belief
- Gender reassignment
- Marriage and Civil partnership
- Pregnancy and maternity
- Sex
- Sexual orientation

Although this sort of crime is collectively known as 'Hate Crime' the offender does not have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.

This can be evidenced by:

- threatened or actual physical assault
- derogatory name calling, insults, for example racist jokes or homophobic language
- hate graffiti (e.g. on school furniture, walls or books)
- provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations
- distributing literature that may be offensive in relation to a protected characteristic
- verbal abuse
- inciting hatred or bullying against pupils who share a protected characteristic
- prejudiced or hostile comments in the course of discussions within lessons
- teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background
- refusal to co-operate with others because of their protected characteristic, whether real or perceived
- expressions of prejudice calculated to offend or influence the behaviour of others
- attempts to recruit other pupils to organisations and groups that sanction violence, terrorism or hatred.

What is Pilgrims' doing?

We will respond by:

- clearly identifying prejudice-based incidents and hate crimes, and monitoring the frequency and nature of them within the school via CPOMS.
- taking preventative action to reduce the likelihood of such incidents occurring
- recognising the wider implications of such incidents for the school and local community
- providing regular reports of these incidents to the Governing Body
- ensuring that staff are familiar with formal procedures for recording and dealing with prejudice-based incidents and hate crimes
- dealing with perpetrators of prejudice-based abuse effectively
- supporting victims of prejudice-based incidents and hate crimes
- ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again

Faith Abuse

The number of known cases of child abuse linked to accusations of 'possession' or 'witchcraft' is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem.

Such abuse generally occurs when a carer views a child as being 'different', attributes this difference to the child being 'possessed' or involved in 'witchcraft' and attempts to exorcise him or her.

A child could be viewed as 'different' for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the carer and the child.

There are various social reasons that make a child more vulnerable to an accusation of 'possession' or 'witchcraft'. These include family stress and/or a change in the family structure. The attempt to 'exorcise' may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.

If the School becomes aware of a child who is being abused in this context, the DSL will follow the normal referral route to children's social care.

Gangs and Youth Violence

The majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels, there will almost certainly be a significant impact.

We have a duty and a responsibility to protect our pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While pupils generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education.

Early warning signs that children may be at risk of getting involved in gangs can be spotted at a younger age. Crucial preventive work can be done within school to prevent negative behaviour from escalating and becoming entrenched.

What is Pilgrims' doing?

We will:

- develop skills and knowledge to resolve conflict as part of the curriculum
- challenge aggressive behaviour in ways that minimise the chance of recurrence of such behaviour, thereafter managing any increasingly firmly with zero-tolerance
- understand risks for specific groups, including those that are gender-based, and target interventions
- safeguard, and specifically organise child protection, when needed
- make referrals to appropriate external agencies
- carefully manage individual transitions between educational establishments or alternative provision such as home learning.
- work with local partners to prevent anti-social behaviour or crime.

Private fostering (including International Boarders)

Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility, for 28 days or more. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt. The law requires that the carers and parents must notify the Children's Services Department of any private fostering arrangement.

If the School becomes aware that a pupil is being privately fostered, we will inform the Children's Services Department and inform both the parents and carers that we have done so.

The School will take active steps to safeguard boarding pupils requiring guardian arrangements during term-time. Parents must confirm the identity of the person(s) acting as guardians, and must enlist the services of a guardian agency to ensure that all safeguarding checks are in order. International boarders will also be inducted with special care through the induction procedures in the boarding houses, and staff will be attentive to their needs in terms of homesickness, regular contact with their families, and cultural integration. Pupils staying with guardians when not in school will be required to complete a Boarders' Welfare Questionnaire upon return to school to establish if they have any needs or concerns.

Parenting

All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren).

Some children have medical conditions and/or needs e.g. Tourette's Syndrome, some conditions associated with autism or ADHD that have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.

In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place.

What will Pilgrims' do?

We will support parents by signposting them to resources which may be helpful including, but not limited to:

- community-based parenting courses
- web-based parenting resources
- worker/home school link worker (where available)
- discussing the issue with the parent and supporting them in making their own plans of how to respond
- early help services

Part 5 –Safeguarding processes

Safer Recruitment

The School operates a separate safer recruitment process as part of its Recruitment Policy. On all recruitment panels there is at least one member who has undertaken safer recruitment training.

The recruitment process checks the identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references. The School will make use of the Department for Education's 'Check a Teacher's Record' service alongside the checks mentioned above.

Disqualification from working in childcare

Where staff work in, or are involved in, the management of the school's Early Years provision of care (pupils under 8 years), the School will ensure that checks are completed to determine whether those staff are disqualified under the [Childcare Act \(2006\)](#). This forms part of the School's safer recruitment practices.

The School records all checks of staff employed to work in, or manage, relevant childcare on the Single Central Register (SCR). Where a member of staff is found to be disqualified, or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are, or may be, disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope, in principle, to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the Local Authority Designated Officer when appropriate.

The SCR is maintained on a day-to-day basis by the HR Manager, with first-line managerial oversight by the Director of Finance & Resources. They will meet regularly to review the successful maintenance of the SCR. The Headmaster monitors and counter-signs the SCR once each half of term. The member of The Pilgrims' Committee with a focus on safeguarding will monitor and counter-sign the SCR once a term.

Staff Induction

The DSL (or a DDSL in the absence of the DSL) will provide all new staff with training to enable them to both fulfil their role and to understand the Safeguarding and Child Protection Policy, the Staff Behaviour and Code of Conduct Policy, and part one of Keeping Children Safe in Education and Annex A. If staff are new to management, they are required to read the whole of KCSIE including Annex A and B.

This induction may be covered within the annual training if this falls at the same time; otherwise, it will be carried out separately during the initial starting period.

Training of staff and volunteers

All staff have an annual safeguarding update in the September staff INSET. Any further updates are emailed out to staff throughout the year.

- A) **Induction training** – is given to **all** staff and volunteers who work in the School and is refreshed every 3 years.

- B) **Basic Awareness training** – is given to all teaching staff, matrons, medical staff, sports coaches, GAP students and secretaries who administer first aid in the prep and pre prep schools. This training is refreshed, in depth, every 3 years.
- C) **Designated Persons training** - for the DSLs is provided by Hampshire County Council and is refreshed every two years, at least.

All training is inter-agency training. All training is further supplemented in staff INSET.

All staff and volunteers sign a declaration when they have:

- Received training as detailed above
- Read the Staff Code of Conduct
- Read Part 1 of KCSIE (2025) and Annex A (if working directly with children)

And made themselves familiar with;

- Behaviour Policy
- Children Missing in Education Policy

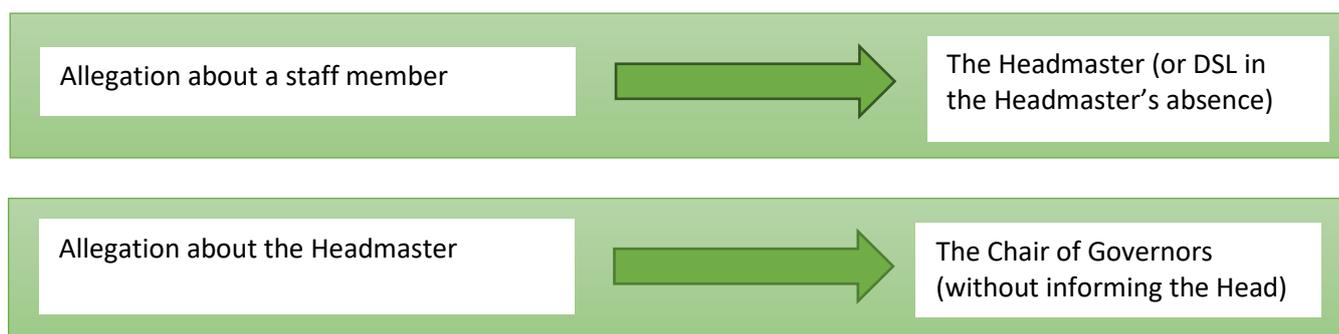
Whistleblowing

Whistleblowing is the term used when a worker passes on information concerning wrongdoing. In this guidance, we call that “making a disclosure” or “blowing the whistle”. The wrongdoing will typically (although not necessarily) be something they have witnessed at work. Whistleblowing law is located in the [Employment Rights Act 1996](#).

The Pilgrims’ School recognises that pupils cannot be expected to raise concerns in an environment where staff fail to do so. The School aims, therefore, to ensure that there is a culture of safety and raising concerns, and an attitude of ‘it could happen here’. No-one who reports a genuine concern, in good faith, needs to fear reprisals.

What Should Staff Do?

If you suspect abuse or wrongdoing towards a pupil by a member of staff you should follow the relevant diagram below:



Where a staff member feels unable to raise an issue with the Headmaster, or feels that their genuine concerns are not being addressed, other whistleblowing channels are now available, including:

- the NSPCC Whistleblowing Advice Line-Phone: 0800 028 0285
- or the LADO (see contact details at the start of this policy)

Any allegation will be thoroughly investigated. The LADO (Local Area Designated Officer) will be called, and if there is evidence of criminal activity the police will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation.

If staff members are concerned about the safeguarding practices within the School, they should follow the whistleblowing advice found in the Staff Code of Conduct. All concerns will be taken seriously by the Senior Leadership Team.

Where an allegation relates to a member of supply staff, the agency will be fully involved in the investigation and outcome. If an allegation is made concerning a contractor, their employer(s) will be notified so patterns of behaviour can be identified.

Allegations of abuse against teachers and other staff

The School's procedures for managing allegations against staff (including the DSL and Head) who are currently working in the School follows Department for Education statutory guidance and Hampshire Safeguarding arrangements, and apply when staff (including volunteers, supply staff and contractors) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil
- Possibly committed a criminal offence against or related to a pupil or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.
- Behaved, or may have behaved in a way that indicates they may not be suitable to work with children. This relates to transferable risk.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases will either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by Hampshire Social Care Services. In these cases, local arrangements should be followed to resolve cases without delay.

The Designated Leads will assess whether or not the member of staff, volunteer, or member of supply staff (if from an agency), has met any of the thresholds for the criteria above. When an allegation or disclosure of abuse has been made involving a member of staff the School communicates immediately with the LADO. Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police, and also to the LADO.

All allegations must be referred to the LADO for advice before any investigation takes place. In borderline cases, these discussions can be held informally and without naming the individual. In the case of serious harm, or if a crime has been committed, the police must be informed from the outset. The School must not undertake its own investigation of an allegation without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. All allegations should be investigated as a priority to avoid any delay.

Low Level Concerns

Low-level concerns: these are any concern (whether considered serious enough to be referred or not) that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, even if they do not meet the allegations threshold. At Pilgrims' we recognise the possibility that adults working in the School may harm children, including governors and members of The Pilgrims' Committee, volunteers, supply teachers and agency staff. Any concerns about the conduct of other

adults in the School should be taken to the Headmaster without delay; any concerns about the Headmaster should go to the Chair of the Pilgrims' Committee. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff are encouraged and should feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Examples of low-level concerns could include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child one-to-one in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Where a member of staff or the staff as a whole are found to be falling short of the bar of our safeguarding expectations, these incidents will be discussed as a staff openly (e.g in staff meetings) and individually where required.

What will Pilgrims' do?

1. All allegations which appear to constitute a low-level concern are to be reported straight away to the 'Headmaster, or to the DSL, who will then take on the role of Case Manager. If an allegation is reported to the DSL, the DSL will keep the Headmaster informed. Where the Headmaster or the DSL is absent, or where the Headmaster is the subject of the allegation or concern, reports should be made to the Chair of the Pilgrims' Committee. Where the Headmaster or the DSL is the subject of the allegation or concern, they must not be informed of the allegation prior to contact with the Chair of the Pilgrims' Committee and LADO.
2. The Case Manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action, including any involvement of the police. (Where the Case Manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the Case Manager may involve the police immediately). All discussions should be recorded in writing, and any communication with both the individual and the parents of the pupil(s) agreed. The Designated Officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria, or that are made directly to the Police and/or the MASH.
3. The Case Manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course of action, unless advised not to by the police or by Children's Social Care. The Case Manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The Case Manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The Case Manager will give due weight to the views of the LADO when making a decision about suspension. When the individual is suspended, the Case Manager will

ensure they know who their point of contact is in the school and shall provide them with their contact details.

5. Where a member of boarding staff is suspended pending an investigation, the Case Manager will consider whether arrangements for alternative accommodation, away from the School and children, should be made.
6. The Case Manager will ensure that parents are informed as soon as possible and kept informed about the progress of the case, subject to any advice from Social Care or the police.
7. The Case Manager will discuss with the LADO whether a referral to the Disclosure and Barring Service, or Teaching Regulation Agency, should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal, or resignation prior to dismissal, of a member of teaching staff specifically, the school must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
8. On conclusion of the case, the Case Manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices, to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Records of Allegations

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE (2025) and a copy will only be supplied to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry, in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Headmaster will consider whether any disciplinary action is appropriate against the pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible, even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Health and Safety

It is a requirement that all schools must have a Health and Safety Policy that details the organisation, roles and responsibilities and arrangements in place at the premise for the managing and promoting of Health and Safety in accordance with the Health and Safety at Work act 1974 and regulations made under the act.

Schools must assess all their hazards and record any significant findings along with what control measures are required. The plans should wherever possible take a common sense and proportionate approach with the aim to allow activities to continue rather than preventing them from taking place.

Site Security

We aim to provide a secure site but recognise that the site is only as secure as the people who use it. Therefore, all people on the site must adhere to the rules which govern it. These are:

- All gates are locked except at the start and end of the school day
- Doors are kept closed to prevent intrusion
- Visitors and volunteers enter at the Front Hall and must sign in
- Visitors and volunteers have their identity checked
- Children are only allowed home during the school day with adults/carers with parental responsibility or permission being given
- All children leaving or returning during the school day must sign out and in

Off site visits

A particular strand of health and safety is looking at risks when undertaking off-site visits. Some activities, especially those happening away from the School and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out. The School has an Educational Visits Co-ordinator (the Director of Studies) and liaises with the local authority's outdoor education adviser where applicable to help colleagues in school manage risks and support with off-site visits and provides training in the management of groups during off site visits, as well as First Aid in an outdoor context.

Physical Intervention (use of reasonable force)

Physical intervention is only to be used where it is felt that the pupil/s may cause harm to themselves or others. In these cases, the member of staff must report and record the incident as soon as reasonable to do so after the incident. Staff will be given support with regard to physical restraint. Staff need to familiarize themselves with the Restraint Policy (Appendix 4 of the Behaviour Policy).

Taking, using and storing images

We will seek consent from the parent/carer of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in school publications, printed media or on electronic publications.

We will not seek consent for photos where you would not be able to identify the individual.

We will seek consent for the period the pupil remains registered with us and, unless we have specific written permission, we will remove photographs after a pupil (or teacher) appearing in them leaves the School or if consent is withdrawn.

Photographs will only be taken on school-owned equipment and stored on the school network. No images of pupils will be taken or stored on privately owned equipment by staff members. **Staff are not permitted to record pupils on personal devices, including but not limited to via images, videos or voice notes.**

Transporting pupils

Staff may on occasions have to transport pupils to and from the School. Where possible, staff should not travel alone with a pupil; however, we recognise in certain situations and/or emergencies they may have to. In these situations, staff should notify the DSL and/or Headmaster as soon as possible.

Where a member of staff is also a parent, the transporting of children other than their own needs permission from the School and relevant parent/carer.

On occasions parents and volunteers support with the task of transporting children to visits and off-site activities arranged by the School; this is in addition to any informal arrangements made directly between parents for after-school clubs etc.

In managing these arrangements, the School will put in place measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars.

Community Safety Incidents

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, or gang-related activity.

As children get older and are granted more independence (for example, as they start walking to school on their own, or Year 8s are allowed into town at specified times), it is important they are given practical advice on how to keep themselves safe. 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.clevernevergoes.org