THE BUCHAN SCHOOL

KING WILLIAM'S COLLEGE

King William's College & The Buchan School

Safeguarding and Child Protection Policy

Issue date: 10/18

Last Review Date (following updates to Keeping Children Safe in Education, September 2026): 08/26

Review by governing body: Autumn Term Governor's Meeting

Next Review: 09/27

Stuart Corrie (Deputy Head)

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1. KEY CONTACTS

1.1 The Deputy Head, being the individual from the SLT with responsibility for child protection matters at King William's College is Stuart Corrie. At The Buchan School, The Deputy Head has this responsibility.

1.2 The Designated Safeguarding Leads (DSL) are:

- Stuart Corrie (Deputy Head, KWC) 820400 or email stuart.corrie@kwc.im
    - Rosie Ellwood (Deputy Head of Buchan) 820481 or email rosie.ellwood@kwc.im

1.3 The Deputy Designated Safeguarding Leads to contact in their absence are:

- Susie Parry (Head of Boarding) 820400 or email susie.parry@kwc.im
- Melissa Hawley (Buchan Pre-Prep) 820481 or email Melissa.hawley@kwc.im
- Heads of Year are also trained to Level 3 DSL.

1.4 The Designated Governor for Safeguarding and Child Protection is:

- Elaine Higgins, email: elaine.higgins@kwc.im

1.5 The Designated Person responsible for the Central Register of Appointments is:

- Moira Mackie, Chief Operating Officer email: moira.mackie@kwc.im

1.6 **External Agencies**

Manx Care Children & Families Division
2nd Floor, Murray House, Mount Havelock
Douglas
IM1 2SF
01624 682363 or 01624 682369 Duty Social Worker: 01624 686179

Isle of Man Safeguarding Board
01624 686179 during office hours
01624 631212 out of office hours o r email safeguardingboard.co@gov.im

Disclosure & Barring Service referrals helpline: 01324 953795

Registration and Inspection Unit
1st Floor Belgravia House, 34-44 Circular Road
Douglas
IM1 1AE

01624 642422
Email: R&I@gov.im

Designated Officer (allegations regarding a person who works with children): 01624 686259
Safeguarding.Unit@gov.im

2. INTRODUCTION

2.1 King William's College ("the School", which for the purposes of this Policy includes the Buchan School), and its Governing Body is committed to safeguarding and promoting the welfare of children and young people and believes that all pupils, regardless of gender, age, special needs or disability, racial/cultural heritage, religious belief or sexual orientation have the right to be protected from all types of harm and abuse. Safeguarding and promoting the welfare of children is defined by KCSIE 2026 as:

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

The School expects all staff to share this commitment and this Safeguarding and Child Protection Policy forms a fundamental part of our approach to providing excellent pastoral care to *all* pupils, including young people who may be over the age of 18 years. Safeguarding is everyone's responsibility; everyone has a role to play and the best interests of the individual pupil are at the centre of the School's approach.

2.2 This Policy applies to all permanent and temporary employees of the School (including for this purpose agency staff and self-employed persons who have a contract to provide services to the School) ("Staff"), Governors, and volunteers at the School ("Volunteers"). This Policy applies whenever Staff, Governors, or Volunteers are working with pupils, including where this is away from the School, for example at another institution, on School visits and trips, and whilst attending sporting and cultural activities.

2.3 This Policy is published on the School website. A paper copy of this Policy is available to parents upon request to the Principal's Office. All staff receive a "Safeguarding Children Guidelines" card which details good practice.

2.4 The School recognises its duty to protect its pupils from harm, and to co-operate with other agencies in carrying out this duty and will take appropriate action, in cooperation with Manx Care Department of Health and Social Care Children and Families team and the Isle of Man Safeguarding Board when it suspects that pupils are subject to abuse.

2.5 The School sometimes provides activities outside the normal operation of the School (e.g. holiday clubs). The normal School Safeguarding arrangements will apply in these cases. Where the School or an area of the School is

let out to external organisations, the School will ensure that the activity provider has appropriate safeguarding arrangements are in place. If the School receives an allegation relating to an external provider, the established safeguarding protocols of the school will be followed.

2.6 Any allegation or suspicion of abuse arising from within or outside School and relating to or involving pupils, Staff, Governors or Volunteers will be taken seriously and will be referred to the appropriate external agency in accordance with the relevant procedures set out or referred to in the Key Documents (defined below).

2.7 The key documents referred to in this Policy (the "Key Documents") are:

- The Children and Young Persons Act 2001 [https://www.courts.im/media/1703/children-and-young-persons-act-2001.pdf]
- Education Act 2001
    - [https://www.legislation.gov.im/cms/images/LEGISLATION/PRINCIPAL/2001/2001-0033/2001-0033_7.pdf]
    - Education (miscellaneous provisions) Act 2009 [https://legislation.gov.im/cms/images/LEGISLATION/PRINCIPAL/2009/2009-0003/2009-0003_1.pdf]
- Working Together to Safeguard Children 2026 (WTSC) [https://assets.publishing.service.gov.uk/media/69fb1c28d0e316a40f269a5b/Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf]

- The Isle of Man Safeguarding Board (February 2024) [https://www.safeguardingboard.im/]
- Keeping Children Safe in Education (KCSIE), statutory guidance for schools and colleges, September
    - 2026. [https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_educati
    - on_from_1_September_2025.pdf]
- Disqualification under the Childcare Act 2006 (June 2016). [https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-
    - 2006/disqualification-under-the-childcare-act-2006]
- What to do if you are worried a child is being abused: advice for practitioners (March 2015) [https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf]
- Isle of Man Boarding Schools Minimum Standards (April 2017) [https://www.gov.im/media/810174/boarding-schools-minimum-standards-final.pdf]
- Isle of Man Child Day Care Centres Minimum Standards (April 2017) [https://www.gov.im/media/1345646/2017-child-day-care-centre-standards-v2.pdf]
- Education (Independent Schools Standards)(England) Regulations 2010, as amended 2013
- Teacher Misconduct – Disciplinary procedures for the teaching profession (May 2020) [https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/541048/Disciplinary
- -Procedures_-_updated_July_2016.pdf]
- Mental health and behavior in schools (November 2018) [https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf]
- Preventing and tackling bullying (July 2017) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6
- 23895/Preventing_and_tackling_bullying_advice.pdf]
- Promoting Children and Young People's Emotional Health and Wellbeing (March 2015) [https://assets.publishing.service.gov.uk/media/614cc965d3bf7f718518029c/Promoting_children_and_young_people_s_mental_health_and_wellbeing.pdf]
- DBS Referral Guidance (as may be amended from time to time) [https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs]
- NSPCC – When to Call the Police – Guidance for Schools [https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf]
- New Definition of Extremism (March 2024) [https://www.gov.uk/government/publications/new- definition-of-extremism-2024/new-definition-of-extremism-2024]
- The Use of Social Media for on-line radicalization (July 2015)
- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social
- _media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf
- Sexual violence and sexual harassment between children in schools and colleges (May 2018) [https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between- children-in-schools-and-colleges]
- Relationships Education, Relationships and Sex Education, and Health Education (2021) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/
- 1019542/Relationships_Education__Relationships_and_Sex_Education__RSE__and_Health_Educatio
- n.pdf]
- Lucy Faithfull Foundation "Shore Space": https://shorespace.org.uk/
- Preventing Child Sexual Exploitation (The Children's Society):
- https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation
- Child Sexual Assault Resources for Education Settings: https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns/

- Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024) [https://assets.publishing.service.gov.uk/media/65d62b02188d770011038855/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings__Web_accessible.pdf]
- Female Genital Mutilation (FGM) [https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/]
- Preventing youth violence and gang involvement (August 2013) [https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence]
- Criminal exploitation of children and vulnerable adults: county lines (September 2018) [https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable- adults-county-lines]
- Isle of Man Equality Act (2017) [https://www.gov.im/categories/working-in-the-isle-of- man/employment-rights/equality-act-2017/]
- Behaviour in Schools (October 2022) [https://www.gov.uk/government/publications/behaviour-in- schools--2]
- Safeguarding children with special educational needs and disabilities (SEND) (May 2022) [https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with- special-educational-needs-and-disabilities-send]
- Safeguarding d/Deaf and disabled children and young people (June 2024) [https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#risk-and-vulnerability-factors]
- Generative AI in Education (2025): https://www.gov.uk/government/publications/generative-ai- product-safety-expectations/generative-ai-product-safety-expectations

2.8 If a member of Staff, Volunteer or Governor becomes aware of suspected or alleged abuse or any other child protection concerns a report should always be made immediately to the Designated Safeguarding Lead [DSL] (or deputy). Other members of Staff, Volunteers or Governors should not investigate any suspicions or allegations themselves. The appropriate procedure to follow is set out in more detail in Section 4 of this Policy below.

2.9 Contact information for relevant authorities and for the DSL is contained in Section 13.

3. AIMS

3.1 In implementing this Policy the School aims to:

- create an environment in our School which is safe and secure for all pupils
- educate children about safeguarding through the curriculum and in PSHE lessons, helping children to adjust their behaviour to reduce risk and to build resilience, with particular attention to the safe use of electronic equipment and the internet. Relevant issues will be covered through Relationships Education and Relationships and Sex Education in PSHE lessons.
- set out procedures for ensuring that the School meets its responsibilities for safeguarding children from abuse
- protect each pupil from any form of abuse, whether from an adult or another pupil
- protect Staff against untrue or unfounded allegations of abuse
- support a pupil's development in ways that will foster security, confidence and independence
- raise awareness of both teaching and non-teaching Staff of the need for Child Protection and of their responsibilities in identifying and reporting possible cases of abuse
- provide a systematic means of monitoring pupils known or thought to be at risk
- emphasize the need for good levels of communication between all members of Staff
- develop a structured internal procedure to be followed by all members of the School community in cases of alleged or suspected abuse

- promote understanding and build relationships with relevant agencies in order to work together more efficiently.

3.2 Safeguarding covers much more than child protection and so this Policy will operate in conjunction with other related policies and procedures, covering areas such as Anti-Bullying, Behaviour Management, ICT Acceptable Use, E-safety and Missing Pupils.

4. RESPONSIBILITIES

General

Every member of Staff, Governor and Volunteer who assists the School is under a general duty to:

- protect children from abuse;
- prevent the impairment of children's mental and physical health or development.
- be aware of the School's Safeguarding and Child Protection procedures (including the reading of
- be aware of the school's Behaviour Management Policy (which includes the Anti-
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any relevant complaint, conversation or event; and
- always report any matters of concern to one of the DSLs, know the roles of the DSLs and the identity of the DSLs;
- be aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents, taking note of the Staff and
- undertake appropriate training including annual refresher training, including TES online EduCare training;
- take note of regular safeguarding updates from staff meetings and email updates;
- be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside these environments. Staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence;

- recognise that anybody can make a referral to Manx Care Children and Families/Safeguarding Board. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

4.1.2 Any child may benefit from early help, but all Staff, Governors and Volunteers should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- is a young carer;

- is pregnant and/or is a parent themselves;
- has exhibited early signs of abuse, violent and/or harmful behavious;
- is showing signs of being drawn into anti-social or criminal behavior, including gang involvement and association with organized crime groups or county lines;
- is frequently missing/goes missing from education, care or home;
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part time timetable, is at risk of being permanently excluded from school, colleges and in Alternative Provision or a Pupil Referral Unit;
- is at risk of exploitation, modern slavery, trafficking, including sexual and/or criminal exploitation;
- is at risk of being radicalized into terrorism;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- is at risk of so-called 'honour' or faith based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;

The Governing Body

4.2 The Governing Body is accountable for ensuring the School has effective policies and procedures in place which are in accordance with the Key Documents and for monitoring the School's compliance with the requirements of the Key Documents.

4.2 The Governing Body will designate a Governor (the "Designated Governor" for Safeguarding who will oversee the operation of this Policy and the related procedures and champion child protection issues). Contact details for the Designated Governor are set out in Section 1.4.

4.4 The Designated Governor (in liaison with the DSLs) will determine appropriate safeguarding and child protection training for the Governing Body at induction and ensure that this is carried out. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at the School are effective and support the delivery of a robust approach to safeguarding.

4.5 The Governing Body is responsible for undertaking an annual review of this Policy and the related procedures and of the efficiency with which the duties thereunder have been discharged.

4.6 The Governing Body will receive and consider a regular report from the Principal on safeguarding pupils in the School and will take steps to ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay.

4.7 The Governing Body will ensure that the School:

- has a Safeguarding and Child Protection Policy and procedures in place that are in accordance with the Key Documents, and that the Policy is made available to parents;
- has designated an appropriate senior member of the School's leadership team (the DSL), with appropriate status and authority, to take lead responsibility for dealing with child protection issues, providing advice and support to other Staff (including online safety and understanding the filtering and monitoring systems in place), liaising with the relevant external authorities and working with other agencies;
- follows the procedures laid down in the Policy and in the Key Documents for dealing with allegations of

abuse against members of Staff, Governors or Volunteers; and
- remedies any deficiencies or weaknesses in regard to child protection arrangements that are brought to its attention without delay.

4.8 The Governing Body should consider how children may be taught about Safeguarding, including online, through the curriculum and PSHE.

4.9 The Governing Body should also ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are at risk/looked after by a Local Authority. This includes ensuring that staff have the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers and information available to the DSLs.

4.10 The Governing Body should make themselves aware of and follow any new local arrangements that may come into force.

4.11 The Governing Body must be aware of their obligations under The Human Rights Act to:

- the right to freedom from inhuman and degrading treatment;
- the right to respect for private and family life;
- require that all of the rights and freedoms set out in the act are protected;
- protect the right to education.

4.12 The Governing Body must be aware of their obligations under The Equality Act (2020) to NOT discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation.

4.13 The Governing Body must be aware of their obligations under The Public Sector Equality Duty (PSED) to have due regard for the need to eliminate unlawful discrimination, harassment and victimization, to advance equality of opportunity and to foster good relations between those who share a relevant characteristic and those who do not.

4.14 The Governing Body, whilst considering their responsibility to safeguard and promote the welfare of children and young people, must endure that they are doing all they reasonably can to limit children's exposure to unacceptable risk. As part of this process, they must ensure that appropriate filters and monitoring systems are in place, ensuring that SLT and relevant staff have an awareness and understanding of the provisions in place, how to manage them and how to escalate concerns when necessary.

4.14 The Chairman of the Governing Body is responsible for liaising with the relevant external agencies, as appropriate, in the event of allegations of abuse being made against the Principal.

4.15 The Governing Body will ensure that appropriate information is shared with the relevant staff and that a proportionate approach is taken to the level of information shared with temporary staff, volunteers and contractors.

The Principal

4.16 The Principal will ensure that:

4.16.1 this Policy and related procedures are kept up-to-date, reviewed annually, are implemented and are known to and followed by Staff, Governors and Volunteers;

4.16.2 there are sufficient resources and time allocated to enable the Designated Persons to carry out their functions, including attending meetings with external agencies;

4.16.3 Staff and Volunteers feel able to raise any concern about poor or unsafe practices in accordance with the School's Whistleblowing Policy;

4.16.4 any relevant concerns relating to child protection issues are properly addressed;

4.16.5 Governors and parents are kept informed, as appropriate, of any child protection issues which arise (while having appropriate regard to the need for confidentiality and to handle such issues sensitively);

4.16.6 the School practices safer recruitment in checking the suitability of Staff, Governors and volunteers to work with children and seeks undertakings, as appropriate, from other organisations that they do likewise (see paragraph 6 and Appendix 5 below);

4.16.7 a report is made to the Isle of Man Safeguarding Board, the Department of Education and Children, and the Department of Social Care as soon as is reasonably practicable and in any event within one month - where the School ceases to use the services of any person, member of Staff or Volunteer because it is considered that the person is unsuitable to work with children – (or would have done so had that person not resigned, retired or ceased for another reason to carry out services for the School which bring him or her into contact with pupils). In such circumstances a review of this Policy will be undertaken and a report made to the Governing Body without delay;

4.16.8 all Staff and Volunteers are alert to signs of abuse and neglect (appropriate to their role) and all Staff and Volunteers know to whom they should report concerns or suspicions.

4.16.9 a report on Safeguarding is made annually to the Governing Body in accordance with paragraph 3.6 above.

The Designated Safeguarding Leads

4.17 The Designated Safeguarding Lead (and any deputies) are most likely to have a complete safeguarding picture. The DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) and is a member of the Senior Leadership Team. Deputies are trained to the same standard and whilst activities can be delegated to the deputies, the lead responsibility is not.

The DSL will:

4.17.1 ensure that this Policy and the related procedures are kept up-to-date, reviewed annually and are implemented and are known to and followed by Staff;

4.17.2 ensure that all Staff receive training in Safeguarding Children as part of their induction and receive updated safeguarding training annually;

4.17.3 ensure that all volunteers and temporary Staff who work with children are made aware of this Policy and the School's arrangements for child protection and that such volunteers and temporary staff confirm in writing that this has been done. The DSL is a source of support, advice and expertise for all staff;

4.17.4 ensure that all staff, including temporary staff and volunteers receive induction training which includes:

- The School's Safeguarding and Child Protection Policy
- Behaviour Management Policy

- The Staff Code of Conduct
- Missing Student Policy
- Acceptable Use of IT Policy
- E-safety Policy
- The identity and role of the Designated Persons (and their deputies)
- A copy of Part 1 KCSIE (September 2026)
- Whistleblowing Procedure

4.17.5 The training to staff and volunteers includes the following information:

- How to manage a report of child on child sexual violence and sexual harassment
- Awareness of the staff role in the early help process
- How to make a referral to Manx Care Children and Families
- What to do if a child tells them they are being abused, exploited or neglected
- Reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

4.17.6 inform the Principal, as a first priority, of any allegation or suspicion of abuse involving any pupils, member of Staff, Volunteer or any other person working in the School (in the absence of the Principal the allegation should be notified to the Chairman of the Governors); also inform the Principal of any ongoing enquiries under section 47 of the Children Act and police investigations, including the need for children to have an appropriate adult. For further advice, see: [https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible]

4.17.7 ensure information on individual cases is passed only to people who "need to know"; and support Staff involved in reporting child abuse;

4.17.8 keep appropriate secure, clear records on the wellbeing module of iSAMS;

4.17.9 maintain a confidential risk register for those pupils who are known to be at risk. Names will be entered if it is confirmed by the appropriate external authority that the child is actually at risk.

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

- Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

  4.17.10 ensure all relevant child protection records are sent to the receiving school or establishment when a pupil moves schools, ensuring secure transit, and confirmation of receipt should be obtained. This should be transferred separately from the main pupil file;

  4.17.11 liaise with other agencies and professionals – Multi-agency working; the School has a pivotal role in

multi-agency safeguarding arrangements. Practically, this involves the below:

- Refer cases of suspected abuse to the Manx Care Social Care Children & Families as required;
- Support staff who make referrals to Manx Care Social Care Children & Families;
- Refer cases to the Channel programme where there is a radicalization concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required
- Refer cases where a crime may have been committed to the police as required. Helpful guidance is given in the document: NSPCC - When to Call the Police
- As required, liaise with Manx Care Social Care Children & Families in cases which concern a staff member;
- Liaise with staff (especially the pastoral team, medical centre team, IT technicians and SENCO) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral.
- Where children leave the school, the DSL should ensure their children protection file is transferred to the new school or college as soon as possible. Confirmation of receipt should be obtained. This will either be sent via registered mail, or as a password protected email. Sometimes it is appropriate to share information in advance of a child leaving (to ensure that appropriate support is in place).

4.17.12 ensure that either they, the form tutor or other delegated member of Staff, attend relevant external meetings, provide reports as required and otherwise assist and cooperate fully with external authorities;

4.17.13 ensure that any pupil currently on the child protection register who is absent without explanation for two days is referred to their Social Worker;

4.17.14 provide the Safeguarding Committee termly meeting (chaired by the Governor responsible for Safeguarding) a report detailing any changes to the Policy and procedures; in consultation with the Head of Human Resources, a report of training undertaken by the Designated Persons, and by members of Staff; the number and type of incidents/cases, and the number of children currently on the child protection register (anonymised);

4.17.15 work with the IT Director, Heads of Year, and Head of PSHE on online safety, ensuring that relevant training is provided for all members of the School community as appropriate.

4.18 The DSLs and their Deputies must undertake the appropriate training in accordance with the Key Documents to include Isle of Man Safeguarding Board inter-agency child protection training in addition to basic child protection training. They will attend refresher training at least at two yearly intervals (including Prevent awareness training). The DSL must also attend the termly "Isle of Man Safeguarding in Education" meetings.

They must keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and statutory intervention, including Social Care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review and be able to attend and contribute to these effectively when required to do so;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to

support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

4.19 Contact details for the DSLs and their deputies are set out in section 1.

5. THE MANAGEMENT OF SAFEGUARDING

5.1 The individual from the Senior Leadership Team of the School who has overall responsibility for Child Protection matters is the Deputy Head. The Deputy Head will also be the Designated Safeguarding Lead as regards King William's College. Their name and contact details are set out in Section 1 – Key Contacts. For the Buchan School, The Deputy Head of Buchan is the Designated Safeguarding Lead.

5.2 The Designated Governor for Safeguarding and Child Protection will Chair the Safeguarding Committee which will meet at least every term to monitor the School's Safeguarding Policy.

5.3 The members of the Safeguarding Committee will be the The Designated Governor (Chair), Deputy Head, The Principal, the Deputy Designated Persons, the Chief Operating Officer and the HR Manager responsible for the Central Register of Appointments.

5.4 The Minutes of the termly Safeguarding Committee meetings will be emailed to the Designated Governor for Safeguarding and Child Protection and will be considered by the Finance and General Purposes Committee of the Governing Body at its termly meeting.

5.5 The purpose of the Safeguarding Committee is to monitor and review the safeguarding policy and procedures of the School. In particular, the following areas will be standing agenda items for the Committee:

5.5.1 The Child Protection Training Requirements of the Designated Persons pursuant to paragraph 3.13 of the policy.
5.5.2 The Child Protection Training Requirements of all staff pursuant to paragraph 3.12.2 of the policy.
5.5.3 Safeguarding induction for all new staff.
5.5.4 The pre-employment checks of new staff and volunteers and the proper compilation of the Central Register of employees pursuant to paragraph 7 and Appendix 5 of the policy.
5.5.5 The induction training of all new staff pursuant to paragraph 4.12.4 of this policy.
5.5.6 The confidential list of at risk/'looked after' children (if any) at the school pursuant to paragraph 3.12.8 of the policy.
5.5.7 The staff, skills, knowledge and understanding necessary to keep safe children who are at risk/'looked after' by a Local Authority (see paragraph 3.9 above)
5.5.8 How children at the school may be taught about safeguarding, including online, through the curriculum and PSHE. (see paragraph 3.8 above)
5.5.9 Any specific safeguarding/child protection issues which have warranted contact with external agencies.
5.5.10 Undertakings received from third parties regarding pre-employment checks (see paragraph 7.4 below).
5.5.11 Arrangements and monitoring as regards any employee awaiting a DBS check who is employed (or is acting as a volunteer) under supervision.

5.6 The Minutes of the Safeguarding Committee should be sufficiently detailed to demonstrate the depth of the review.

6. PROCEDURES

6.1 **Initial complaint**: A member of Staff, Volunteer or Governor suspecting or hearing a complaint of abuse must:

6.1.2 listen carefully to the pupil and keep an open mind;
6.1.3 not take a decision as to whether or not the abuse has taken place;
6.1.4 not ask leading questions, that is, a question which suggests its own answer;
6.1.5 reassure the pupil but not give a guarantee of absolute confidentiality;
6.1.6 explain that they need to pass the information to the appropriate Designated Person who will ensure that the correct action is taken;
6.1.7 keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the DSL as soon as possible.

6.2 **Preserving evidence**: All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be passed to and safeguarded and preserved by the DSL. Even if the evidence is "tidied" for presentation to another party, all original notes must also be submitted.

6.3 **Reporting**: All suspicions or complaints of abuse must be reported to the relevant DSL or Deputy DSL, or if the complaint involves the DSL, to the Principal. Details for reporting allegations against members of Staff are given in Appendix 2 below.
If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

6.4 Members of Staff must, as soon as reasonably practicable after making a report, complete the Form "Safeguarding Concern" and pass this to the DSL. Copies of this form are also held on the staff section of 'Firefly' and paper copies are available from the Deputy Head Pastoral.

6.5 **Action to be taken by the DSL:**

6.5.1 the DSL should discuss all relevant circumstances with the person who has received the initial complaint;
6.5.2 if concerns persist about the welfare of a pupil or pupils it is the duty of the DSL to refer allegations and suspected cases of abuse to Manx Care Social Care Children & Families as soon as possible and in any event within 48 hours and in accordance with the Isle of Man Safeguarding Board procedures.

An Action Flowchart is set out in Appendix 1.

6.6 If there is any doubt as to whether a referral should be made, the DSL will consult with the Isle of Man Safeguarding Board, or with Manx Care Social Care Children & Families Duty Social Worker on a no names basis without identifying the family. However, as soon as concern exists that a child is at risk of significant harm, a referral will be made without delay (and in any event within 24 hours). If the initial referral is made by telephone, the DSL will confirm the referral in writing within 48 hours using the "Safeguarding Board Referral Form to Children and Families", also known as a MARF (http://www.isleofmanscb.im/professionals.html). If no response or acknowledgment is received within 24 hours, the DSL will contact Social Services again.

6.7 The action to be taken once a referral has been made will consider:

6.7.1 the inter-agency procedures of the Isle of Man Safeguarding Board;

6.7.2 the nature and seriousness of the suspicion or complaint;

6.7.3 the wishes and feelings of the pupil who has made the complaint, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes;

6.7.4 the wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Person is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before deciding to disclose;

6.7.5 duties of confidentiality, so far as applicable.

6.8 **Allegations against Staff:** Any allegation of abuse made against a teacher or other member of Staff or volunteer will be taken seriously and will be dealt with fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. These procedures are set out in full in Appendix 2.

6.9 A report to the Principal or a Designated Person should be made if a teacher, volunteer or other member of Staff has:

6.9.1 behaved in a way that has harmed a child, or may have harmed a child;

6.9.2 possibly committed a criminal offence against or related to a child;

6.9.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

6.10 **Staff Code of Conduct/Behaviour Policy** is set out in the Staff and Community Code of Conduct. This is distributed to and read by all current and new employees. The Policy includes guidance for staff to minimize harm to pupils and allegations of harm to pupils.

6.11 **Online Safety** and the School's approach to it is set out in the E-Safety Policy. Reference should also be made to the Behaviour Management Policy and the Anti-Bullying Policy. There is information below on the sharing of inappropriate images Child on Child abuse.

6.12 Safeguarding Children – Staff Guidance: this guidance document sets out the duties and responsibilities of Staff in safeguarding matters. It is set out in Appendix 4 of this Policy and is published in the Staff Section of Firefly.

6.13 **Allegations against pupils**: Any allegation of abuse made against a pupil will be taken seriously and will be dealt with fairly, quickly and consistently. The School will take advice from Manx Care Social Care Children & Families Duty Social Worker or Isle of Man Safeguarding Board on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's Policy on behaviour, discipline and sanctions will be applied appropriately. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Social Services, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the School will take appropriate measures to support a pupil against whom an allegation has been made. This may involve providing alternative accommodation for the pupil during the investigation.

6.14 **Informing parents:** Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with Social Services, the Police and/or the Principal before contacting parents.

6.15 **Liaison with Other Agencies:** The School will work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance and written reports at case conferences, core groups and child protection review conferences. If early help is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to Isle of Man Social Care for assessment for statutory

services, if the child's situation does not appear to be improving or is getting worse.

6.16 **The Child Protection Register:** The School will notify Social Services if a decision is taken to exclude a pupil who is on the child protection register (whether fixed term or permanently)

6.17 **Case conferences and strategy/core group meetings:** In each such circumstance the School will assign the appropriate member of Staff to attend a Child Protection Case Conference. Where possible the member of Staff will be accompanied by the Designated Person but this may not always be possible. Staff should prepare a report presenting this to the Case Conference chair at the start of the meeting. The chair will gather all information and assess the risks. Staff will be asked for their view in respect of Child Protection registration. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

6.18 If a child's name is placed on the Child Protection Register a Core Group (as defined by the Isle of Man Safeguarding Board) will be convened. All Core Group members meet with sufficient frequency to facilitate working together and to monitor actions and outcomes as set out in the child protection plan. Attendance at these meetings will be given priority.

6.19 All concerns, discussions and decisions made, and the reasons for those decisions will be recorded on the confidential and secure Wellbeing module of iSAMS. These records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and notes of any actions taken, decisions reached and outcomes.

6.20 The DSL will be available to advise and support Staff involved in Child Protection Register issues.

7. CONFIDENTIALITY & INFORMATION SHARING

7.1 The School will keep all child protection records confidential and secure, allowing disclosure only to those who need the information to safeguard and promote the welfare of children. If a pupil moves to another school, the wellbeing file which includes child protection records will be shared with the new school. The School will co-operate with Social Services and the Police to ensure that all relevant information is shared for the purposes of child protection investigations.

7.2 Child protection records will include:

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

8. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

8.1 The School will operate safe recruitment practices including ensuring appropriate Vetting Checks and reference checks are undertaken in accordance with the Key Documents in order to reduce the risk of children being abused by the School's Governors, Staff or Volunteers.

8.2 There is a separate Recuitment Policy and Appointment procedure available on the School Website.

8.3 The School will obtain undertakings that appropriate child protection checks and procedures apply to staff employed by third parties or other organisations which may have responsibility for pupils (for example, staff employed by outside activity providers) on or off the School site.

8.4 The School will ensure that appropriate checks are made of all people who serve as School Governors.

8.5 In relation to any UK citizen, the School may refer to the DBS for consideration any unsuitable employee or prospective employee in the light of information arising from the DBS process.

9. EARLY YEARS FOUNDATION STAGE (EYFS)

9.1 This Policy applies to the School's provision for the Early Years Foundation Stage ('EYFS'). The identity of and contact details for the Designated Safeguarding Lead/s with lead responsibility for safeguarding within this setting are set out at Section 12.

9.2 Use of mobile phones and cameras: everyone who works in Early Years will keep their personal mobile phones locked in staff lockers in the staff room. Only school cameras and school iPad/tablets are to be used in EYFS and these are not to be removed from school. These school devices are locked away overnight. All staff in the EYFS are required to adhere to the ICT Acceptable Use Agreement, and specifically to ensure that any images taken of pupils are appropriate and stored and managed safely.

9.3 Parents are made aware of the fact that photographs and video cannot be taken in an EYFS setting. Notices remind parents of this and a reminder of this fact is announced at any school event children involving Early Years.

9.4 Safeguarding training for staff in the EYFS will include guidance on identifying signs of possible abuse and neglect (such as significant changes in a pupil's behaviour, deterioration in wellbeing, physical indications, or comments which give cause for concern) and on how to respond in a timely and appropriate way to such signs or to inappropriate behaviour in other members of staff or any other person working with children (Statutory Framework for the EYFS (2014) Section 3.6).

9.5 Registration and Inspection (Social Services) will be informed 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) using the Statutory Notification of Events (within 24 hours of the event occurring). Registration and Inspection will also be informed of the action taken in respect of the allegations using the Statutory Notification of Events form: (https://www.gov.im/media/1379929/2023-notification-of-events-form-300623.pdf)

9.6 The Childcare (Disqualification) Regulations 2009 made under section 75 of the Childcare Act 2006 provides that a person who is disqualified under the 2009 Regulations may not provide relevant childcare provision or be directly concerned in the management of such provision. Regulation 9 of the 2009 Regulations also provides that a person may not be employed to provide early years child care if they live in the same household as someone who has been disqualified. Every member of staff who provides early years childcare at The Buchan School is asked to complete an annual Self Declaration Form. Further information can be found at http://www.safeguardinginschools.co.uk/disqualification-by-association-february-2015/

10. BOARDING

10.1 Within the boarding context, relationships may develop. The School forbids sexual acts between pupils. The School aims to keep such incidents confidential from other pupils, but will refer concerns to Isle of Man Safeguarding Board for advice and guidance.

10.2 Where there is a suspicion of abuse between pupils, the School recognises the importance of moving swiftly (notwithstanding its duty to refer concerns without delay to Social Services) and the protection of all parties involved. This may require separation and additional supervision. By promoting an open atmosphere of mutual trust within the boarding community; experienced boarding staff and supervision; access to people that can help, including the Independent Listener or Isle Listen, we hope to minimise the possibility of child on child abuse.

11. CHILD ON CHILD ABUSE

11.1 All Staff should recognise that children are capable of abusing each other and that this can manifest itself in many ways. This is most likely to include, but may not be limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers (including those in boarding); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which encourages, facilitates or threatens physical abuse); sexual violence, such as rape, assault by penetration and sexual assault (which may include online elements); sexual harassment, such as sexual comments, remarks, jokes and online harassment, which may be stand alone or part of a broader pattern of abuse; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (it is a criminal offence and anyone of any gender can be a victim); consensual and non-consensual sharing of nudes (also known as youth produced sexual imagery or sexting); and intiation/hazing type violence and rituals. It is important to note that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh", "boys being boys" or "part of growing up". Although it is more likely that girls will be victims and boys will be perpetrators, all child on child abuse is unacceptable and will be taken seriously. Victims will be reassured that they are supported and that they will be kept safe. A victim will never be given an impression that they are creating a problem by reporting an issue, nor will they ever be made to feel ashamed for making a report. Staff should be aware that evidence shows that girls, children with SEND and LGBTQ+ children are at greater risk. The School will take advice from Isle of Man Social Care on the investigation of allegations of child on child abuse and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse, all of whom are treated as being 'at risk'. The School will respond on a case-by-case basis and all pupils will be supported. Subject to the advice of Social Care and/or the police, parents will be informed as soon as possible. Staff must challenge behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. There is a zero tolerance approach to sexual violence and sexual harassment.

11.2 Following a report of child on child abuse (which includes sexual violence, sexual harassment, upskirting, rascism and inappropriate phobic behaviour, a core group of appropriate staff, usually the DSL (and/or deputy), Head of Year and Form Teacher will make an immediate risk and needs assessment considering:

- the victim;
- the alleged perpetrator;
- all other children (and if appropriate, staff);
- whether the pupils are boarding or day pupils.

The risk assessment will be recorded and kept under review. The DSL will consider the following:

- the wishes of the victim in terms of how they want to proceed;
- the nature of the alleged incident;
- the ages of the children involved;
- the development stages of the children involved;
- any power imbalance between the children;
- is the incident a one off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, or School staff;
- that sexual violence and harassment can take place within intimate personal relationships between children.
- the importance of understanding intra familial harms and any necessary support for siblings following

incidents

- ongoing risks to the victim, other children, and School staff
- contextual safeguarding issues
- if the pupils involved are boarding pupils, whether this can be managed in the boarding house or whether alternative arrangements need to made during investigation and beyond.

The DSL will engage with social care, the police and specialised services as required, acting in the best interests of the victim and supporting the alleged perpetrator. Management options are:

- The School manages the incident internally;
- Multi-agency early help is provided;
- Referral to Isle of Man Social Care;
- Reporting to the police (in addition to Social Care).

Parents will be contacted following an initial investigation so that the child can be fully supported, unless there is a good reason to believe that by doing so the young person will be placed at risk of harm. All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. Abuse that takes place outside school will be treated equally seriously. It will be explained that the law is in place to protect them rather than criminalise them.

11.3 The Designated Safeguarding Lead will be informed of any bullying incidents when there is a reasonable cause to suspect that a child is suffering or likely to suffer significant harm. A log of bullying concerns, investigations and outcomes is held by the Designated Safeguarding Lead.

11.4 The School has a widely publicised anti-bullying policy which is reviewed on a regular basis. The School also promotes positive behaviour on a daily basis, in addition to taking part in local and national initiatives (Anti-bullying week, Mental Health Awareness days for example).

11.5 If a child on child abuse report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if the person who made the allegation is in need of help. If a report is shown to be deliberately invented or malicious, the DSL and the Principal will consider if any disciplinary action is appropriate in line with the Behaviour Management Policy.

11.6 Support for all children is offered through Isle Listen, who primarily provide a level 1 listening service but have higher level services available for children of the School.

11.7 The following resources may be helpful:

- Child Exploitation and Online Protection command: CEOP is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors [https://www.ceop.police.uk/safety-centre/]
- The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies)
- Support from specialist sexual violence sector organisations such as Rape Crisis or The Survivors Trust [https://rapecrisis.org.uk/] or [https://www.thesurvivorstrust.org/find-support]
- The Anti-Bullying Alliance has developed guidance for schools about Sexual and sexist bullying. Online: Schools and colleges should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. [https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/sexual-and-sexist- bullying/investigating-and-responding-sexual]

Online concerns can be especially complicated and support is available from:

- The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and

college staff with regard to online safety issues

- Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF) [https://www.iwf.org.uk/]
- Childline/IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online [https://www.iwf.org.uk/our-technology/report-remove/]
- UKCIS Sharing nudes and semi-nudes advice: Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery). Please see footnote 8 for further information [https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people]
- Thinkuknow from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online [https://www.thinkuknow.co.uk/]
- LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders. [https://undressed.lgfl.net/].

12. SEND & LGBTQ+

12.1 Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

12.1.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

12.1.2 the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and communication barriers and difficulties overcoming these barriers.

12.2 A child or young person who may be LGBTQ+ is not in itself a risk factor for harm. However, children who are LGBTQ+ can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. It is recognized that these risks may be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. The School provides safe spaces where students can share their concerns through the Isle Listen Listening Service, the Medical Centre and the Wellbeing Café which is operated by a member of staff. LGBTQ+ inclusion is part of the statutory PSHE programme. There is a separate "Gender Questioning Children Policy".

12.3 The School is also aware that girls may also be more at risk but that the risk exists for all children.

13. CONSENSUAL AND NON-CONSENSUAL IMAGE SHARING

13.1 "Youth produced sexual imagery" is a phrase introduced to add clarity to the common terms "sexting", "sharing nudes", "sharing semi-nudes" or "dick pics" and involves the sharing of images between young people that they, or another young person, have created of themselves, or taken and created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as "deepfakes" or "deep nudes". Images can be shared online via social media, gaming platforms, chat apps, forums or offline services such as Apple's AirDrop. The motivations for taking and sharing images are not always

sexually or criminally motivated. Revealing Reality (2022) found that 20% of girls and 13% of boys aged between 15 and 18 had shared a nude picture or video. 60% of girls and 31% of boys had been asked to share a nude or semi-nude, 54% of girls and 30% of boys had received an inappropriate image.

13.2 When an incident involving youth produced sexual imagery is brought to the school's attention, the school will follow guidance contained within the document "Sharing nudes and semi nudes: advice for education settings working with children and young people" (UKCCIS, December 2020). This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to police using a Multi Agency Referral Form (MARF).

13.2.1 **Never view, copy, print, share, store or save the imagery or ask a child to share or download. This is illegal.**

- If you have already viewed the imagery by accident (e.g. if a young person has showed it you before you could ask them not to), report this to the DSL and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the young person involved to disclose information about the imagery. Pass this on to the DSL.
- Do not share information about the incident with other members of staff, pupils or parents.
- Do not say anything to blame or shame any person involved.
- Do explain that the incident needs to be reported and reassure them that they will receive support from the DSL.

13.3 Any incidents should be reported to the Designated Safeguarding Lead.

13.4.1 An initial review meeting will be held with appropriate College staff, usually the following people: Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and the relevant Heads of Year. The agenda for this meeting will be:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children's social care at this stage
- In exceptional circumstances, it may be necessary to view the imagery in order to safeguard the young person at the discretion of the DSL – in most cases, imagery should not be viewed.
    - Only view when:
        - It is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved.
        - It is necessary to report it to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report.
        - Is unavoidable because a young person has presented it directly to a staff member or images have been found on the College network or device.
    - If necessary to view, ensure:
        - Never copy, print, share, store or save them.
        - That it is discussed with the Principal
        - That it is only viewed by a DSL
        - That viewing takes place with another member of staff in the room. This member of staff does not need to view the images.
        - That viewing takes place on College premises
        - That it is viewed by a member of staff of the same sex as the image
        - Record how and why the decision to view was made, including who was present.
        - That if a device is confiscated for the police, disconnect from WIFI and data and call the police. Store in a secure place until it can be collected by the police.
- What further information is required to decide on the best response
- Who has created the nude or semi nude? For example, is it an AI-generated imaged shared by another child or young person.

- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the young people involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual. If students from other establishments are involved, the DSLs of those establishments will be contacted so that arrangements to safeguard those students can be put into place promptly.
- Whether to contact parents or carers of the pupils involved. Parents will be contacted following an investigation into the truth of any allegations so that the child can be fully supported, unless there is a good reason to believe that by doing so the young person will be placed at risk of harm.

13.4.2 An immediate referral using the Multi Agency Referral Form will be made in the following circumstances:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13.
- There is a reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming
- If it is known that Social care are currently involved with a young person who is involved in an incident of youth sexual imagery.

If none of the above apply, the initial review meeting may decide to respond to the incident without involving the police or Social Care, though there will always be an option to escalate the situation if further information or concern comes to light.

Please note that consent is not required to share safeguarding information. Clear advice is given to say that although the GDPR and Data Protection Act place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure; they are not a barrier to sharing information, where the failure to do so would cause the safety or well-being of a child to be compromised.

13.4.3 If it is decided to respond to the incident without involving the police or social care, the students will be interviewed by either the DSL, Head of Year or other appropriate member of staff. The purpose of the conversation is to identify (without looking) what the image contains and whether anyone else has been involved, to establish who has seen or shared the image and how best to prevent further distribution.

13.4.4 If a student has shared an image consensually, such as when in a romantic relationship, or as a joke and there is no intended malice, it may be appropriate for the school to manage the incident directly. However, a student sharing someone else's imagery without consent or any incident involving malicious intent will generally be referred to Social Care and / or the police. The school will, should there be any doubt about whether to refer to other agencies will make a referral to Social Care and / or the police.

13.4.5 Once the facts have been established, a review meeting will be held with the Principal to assess the risks to help decide whether Social Care and / or the police should be involved at this stage. The Principal will see each student with their parents to discuss the involvement of the student in the allegation. King William's College considers "sexting" to be a serious breach of the College rules and internal responses to such actions range from Saturday Detention to Permanent Exclusion. The sharing of an inappropriate image will usually merit at least temporary exclusion (suspension) from College for two days.

13.5 In all cases, a report of the allegations, subsequent investigation, the response from the College and lessons

learned will be made available to the Isle of Man Police.

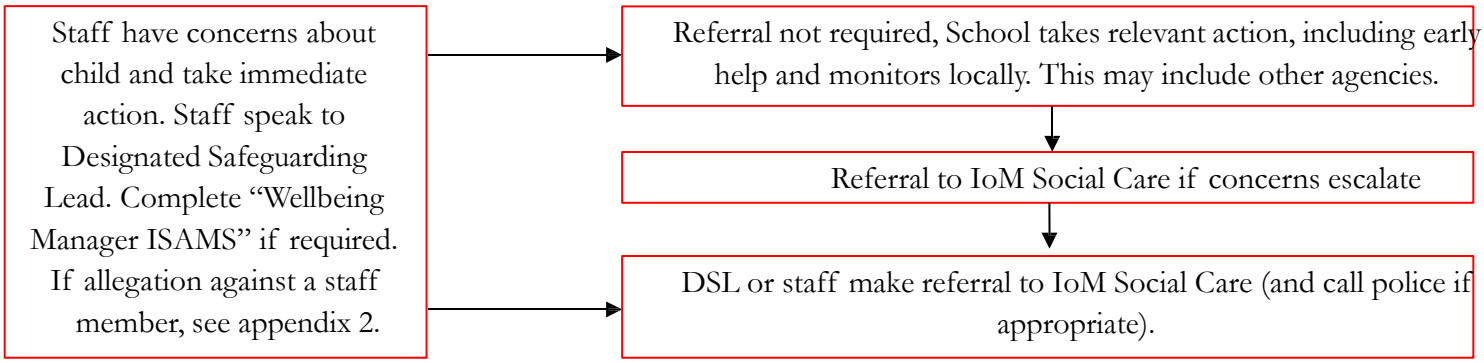
13.6 Education about Youth Produced Imagery will be provided via the PSHE programme, the tutorial programme, visiting speakers and informal conversations. The focus of this will be on factual information: what it is; how it is most likely to be encountered; the consequences of requesting, forwarding or providing such images, including when it is and is not abusive; issues of legality; the risk of damage to peoples' feelings and reputation. The education programme will consider communication, understanding healthy relationships, respecting consent, understanding rights and accepting responsibilities.

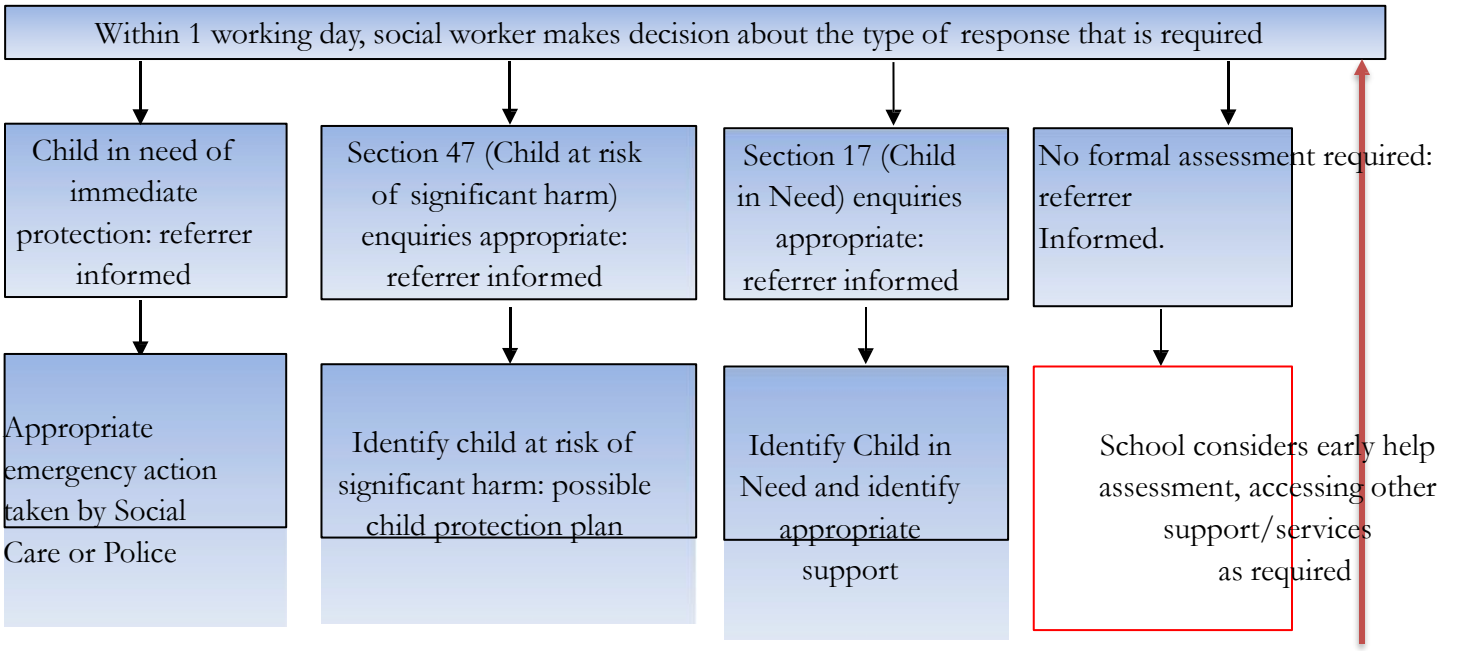
APPENDIX 1: Actions where there are concerns about a child

Anyone can make a referral and although parental consent is preferred, it must not be a barrier to raising a concern. Wherever possible, there should be a conversation with the Designated Safeguarding Lead or deputy who will help decide what to do next. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Isle of Man Duty Social Worker. Share any action with the DSL as soon as possible.

Options include:

- managing any support for the child internally via the School's own pastoral support processes;
- an early help assessment;
- a referral to Isle of Man Social Care (for example as the child might be in need, is in need or suffering or likely to suffer harm).





Anyone can make a referral direct to Isle of Man Manx Care Social Care Children and Families. Parental consent is normally required to make a referral, unless the child is at immediate risk.

APPENDIX 2: SAFEGUARDING CONCERNS AND ALLEGATIONS AGAINST STAFF (INCLUDING THE DESIGNATED PERSON), VOLUNTEERS OR THE PRINCIPAL.

1. The School has procedures for dealing with allegations against Staff, Supply Staff and Volunteers who work with children that aims to strike a balance between the need to protect children from abuse and the need to protect Staff and Volunteers from false or unfounded allegations.

2. Following KCSIE guidance 2026, there are two levels of allegation or concern:
    - Allegations that may meet the harms threshold
    - Allegations/concerns that do not meet the harms threshold – "low-level concerns".

Allegations that may meet the harms threshold.

3. These procedures will be used where the member of Staff or volunteer has:

    - behaved in a way that has harmed a child, or may have harmed a child;
    - possibly committed a criminal offence against or related to a child; or
    - behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children. (The harm test is explained on the Disclosure and Barring service website https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs)
    - behaved or may have behaved in a way that indicates they may not be suitable to work with children (incidents that occur outside of School that did not involve children but could have an impact on their suitability to work with children – the question "could triggers put children at risk?" must be asked).

This Policy and the procedures set out within it are non-contractual and do not form part of the terms and conditions of employment of any member of Staff. This procedure relates to members of staff who are currently working in the School regardless of whether the School is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the police. Historical allegations of abuse will also be referred to the police. Where the school has information to indicate that the former staff member is working with children in another location this should also be reported to the LADO in that location and to the senior management of the school where that member of staff is currently working.

If an allegation is made against a member of staff or volunteer, the School's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

The following definitions are to be used when determining the outcome of allegation investigations:

a) Substantiated: there is sufficient evidence to prove the allegation;
b) Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
c) Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

d) Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

4. **Allegations against Staff:** Manx Care Social Care Children and Families will be informed of all allegations that come to the School's attention and appear to meet the criteria for referral. Where an allegation or complaint is made against the Designated Person or any other member of Staff or a volunteer, the matter should be reported immediately to the Principal. If the Principal is absent, the allegation should be passed to the Chairman of the Governing Body. Where appropriate, the Principal will consult with the Designated Person or Deputy Designated Person and all allegations will be discussed with Manx Care Social Care Children and Families before further action is taken. The nature, content and context of the allegation will be discussed with Social Services and a course of action will be agreed, including any involvement of the police.
5. **Allegations against Supply Staff/Contractor**: It is possible that the School may have to consider an allegation against a person not directly employed by them, where disciplinary procedures do not fully apply. Whilst the School may not be the employer, they must ensure that allegations are dealt with properly. In no circumstances should the School cease to use a Supply Teacher/Contractor due to safeguarding concerns without finding out the facts, liaising with the Duty Social Worker and submitting a MARF (Multi Agency Referral Form). The Principal must discuss with the contractor's agency whether it is appropriate to suspend the staff member of redeploy them to another part of the School whilst an investigation takes place. The nature, content and context of the allegation will be discussed with Manx Care Social Care Children and Families and a course of action will be agreed, including any involvement of the police. The contractor's agency HR representative will be invited to any strategy meetings.
6. **Allegations against the Principal or Chairman of the Governing Body:** Where an allegation or complaint is made against the Principal, the person receiving the allegation should immediately inform the Chairman of the Governing Body, or in his absence the Deputy Chairman, without first notifying the Principal. Similarly, if an allegation is made against the Chairman of the Governing Body, the allegation should be reported to the Principal. Again, any such allegations will be discussed with Manx Care Social Care Children and Families before further action is taken.
7. **Disclosure of Information:** The Principal will inform the accused person of the allegation if appropriate after Manx Care Social Care Children and Families have been consulted. The Parents or carers of the pupil/pupils involved will also be informed of the allegation as soon as possible if appropriate. Where Manx Care Social Care Children and Families advises that a strategy discussion is needed, or the police need to be involved, The Principal should not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed. The parents or carers should be kept informed of the progress of the case, including the outcome of any disciplinary process. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice. Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.
8. **Support:** A School has a duty of care towards its employees and as such, it will endeavour to ensure that appropriate support is provided for anyone facing an allegation. Individuals should be informed of concerns or allegations as soon as it is appropriate to do so and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed to keep him or her informed of the progress of the case. The individual will be advised to contact their trade union representative and a colleague for support. They will also be given access to the informal listening service operated by the School.
9. **Action to be taken against the accused:** Where an investigation by the police or the local authority children's social care services is not deemed by these parties to be necessary, Manx Care Social Care Children and Families

will discuss the steps to be taken with the Principal (or the Chairman of the Governing Body where the allegation is against the Principal). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further investigation to determine the appropriate action. If so, Social Services will discuss with the Principal how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of Staff, but in some instances, it may be appropriate to appoint an independent investigator as advised by the Isle of Man Safeguarding Board.

10. **Suspension:** Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- there is cause to suspect a pupil or other pupils at the School is or are at risk of significant harm; or
- the allegation warrants investigation by the police; or
- the allegation is so serious that it might be grounds for dismissal.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The School will give due weight to the views of Isle of Man Social Services when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment to a post that has no contact with students.

11. **Criminal Proceedings:** The School will consult with Manx Care Social Care Children and Families following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case.

12. **Return to Work:** If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this, for example, a phased return may be appropriate and/or the provision of a mentor to provide assistance in the short term. The School should also consider how to manage the contact with the pupil/pupils who made the allegation.

13. **Ceasing to use Staff:** If the School ceases to use the services of a member of Staff (or a governor or volunteer) because they are unsuitable to work with children, there will be a prompt and detailed report made to the and Families. The School must not agree to any provision in a Compromise Agreement which could or does restrict or remove its obligation to make such a report. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governing Body without delay. Professional misconduct by teaching staff will be referred to the TRA.

NB There is a legal duty to refer to the DBS anyone who has:

1. Engaged in 'relevant conduct':

Relevant conduct in relation to children is conduct which:

- Endangers a child or is likely to endanger a child
- If repeated against or in relation to a child, would endanger a child or would be likely to endanger them
- Involves sexual material relating to children (including possession of such material
- Involves sexually explicit images depicting violence against a person (including possession of such images), if it appears to DBS that the conduct is inappropriate
- Is of a sexual nature involving a child, if it appears to DBS that the conduct is inappropriate. A person's

conduct endangers a child if they:

- Harm a child,
- Cause a child to be harmed,
- Put a child at risk of harm
- Attempt to harm a child, or
- Incite another to harm a child.
- Satisfied the 'harm test' (i.e. no action or inaction occurred but the present risk that it could was significant), or
- Received a caution or conviction for a 'relevant offence' (a list of these offences is available on the DBS website, or call the helpline for advice).

2. Satisfied the harm test;

There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns which satisfy the harm test. To satisfy the harm test there needs to be credible evidence of a risk of harm to children. For a case to be considered as a risk of harm, there must be tangible evidence rather than a "feeling" that a person represents a risk to children. For example, a teacher who confides in their head teacher that they are sexually attracted to children (but who had not engaged in 'relevant conduct') would satisfy the harm test.

3. Received a caution or conviction for a relevant offence;

and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Referrals should be made as soon as possible after the resignation or removal of the individual. Failure to make a Referral to the DBS in such circumstances constitutes an offence.

14. **Resignation:** If a member of Staff (or a Governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the Disclosure and Barring Service in appropriate circumstances. A referral to the TRA will be considered in appropriate circumstances. The School must not agree to any provision in a Compromise agreement which could or does restrict or remove its obligation to make such a report.

15. **Timescales:** All allegations must be dealt with as a priority so as to avoid any delay. It is expected that most cases of allegations of abuse against Staff will be resolved within one month with exceptional cases being completed within 12 months. If a disciplinary hearing is required and can appropriately be held without further investigation or action on the part of Manx Care Social Care Children and Families or other external bodies, it should be held within 15 working days.
16. **Unfounded, false or malicious allegations:** Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's behaviour and discipline Policy.

    Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of Staff unreasonably.

    Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact Social Services and/or the police to determine whether any action might be appropriate.

    Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

17. **Record Keeping:** Details of all allegations found to be malicious will be removed from personnel records.

    A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal pension age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

    The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the School's safer recruitment procedures. In cases where allegations are found to be false, malicious or unsubstantiated, reference will not be made in employer references.

18. **Substantiated Allegations: i**n the event of a substantiated allegation against a member of staff, the School should work with Social Services to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

19. **Learning Lessons:** At the conclusion of a case in which an allegation is substantiated, Manx Care Social Care Children and Families should review the circumstances of the case with the School to determine whether there

are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. Manx Care Social Care Children and Families and the School should consider how future investigations of a similar nature could be carried out without suspending the individual.

Concerns that do not meet the harm threshold

20. Concerns may arise in several ways and from a number of sources (e.g. suspicion, complaint, disclosure made any member of the community, or as a result of vetting checks). Concerns will always be taken seriously and appropriate action will be taken to safeguard children. The aim is to encourage an open and transparent culture in which all concerns are dealt with appropriately and promptly, minimize risk of abuse, and ensure that professional boundaries are clearly understood.

21. A low level concern is when an adult working for the school may have behaved in a way that is:

- Inconsistent with the staff code of conduct
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- Does not meet the Isle of Man Manx Care Social Care Children and Families allegations threshold.

22. Such behaviour may be inadvertent or thoughtless, or perhaps look to be inappropriate without knowing the full context of the circumstance, or it may be intended to enable abuse. These concerns will be shared responsibly with the member of staff, recorded and dealt with appropriately. All staff should be familiar with the Staff Code of Conduct which describes acceptable and unacceptable behaviour.

23. Step 1 - Low level concerns should be shared with the DSL (who will then inform the Principal). If the concern is about the DSL, it should be shared directly with the Principal. Following the report of a concern, evidence will be gathered from the complainant.

- This may be a verbal account that will be recorded contemporaneously by the DSL. A written record is always taken as information is shared.
- Sound professional judgment should be used in determining what information is necessary to record for safeguarding purposes.
- Record should include brief context, concise details and relevant incidents
- Record will be signed, dated and timed.

This will help identify the behaviour and determine if any further action needs to be taken.

24. Staff are encouraged to self refer if, for example, they have found themselves in an uncomfortable situation which may be misinterpreted or may appear compromising to others, or, if on reflection they believe that they have behaved in such a way that they consider falls below the expected professional standards.

25. Step 2 - The DSL will review the information with the Principal and decide whether the behaviour is:

(i) Entirely consistent with the Staff Code of Conduct
(ii) Constitutes a low level concern
(iii) Is serious enough to consider a referral to Manx Care Social Care Children and Families
(iv) When considered with any other previous low level concerns about this individual, should be reclassified as an allegation and referred to Isle of Man Social Care

- Where the DSL is in any doubt, then they should seek advice from Manx Care Social Care Children and Families
- Speak to the individual about whom the concern is raised (unless Manx Care Social Care Children and Families or the Police have advised otherwise if within (iii) or (iv) above).
- The Principal is the ultimate decision maker in respect of low level concerns.

DSL must make records of:

- All internal conversations;
- All external conversations;
- Their determination;
- The rationale for their decision; and
- Any action taken.

26. Step 3 – The Next Steps

When the information shared meets the organisation's expectations and is compliant with Code of Conduct

- DSL to inform the individual concerned what was shared about their behaviour and give them an opportunity to respond;
- Speak to person who shared the low level concern, providing feedback about how and why the behaviour is consistent with the Code of Conduct and the law;
- Consider if a review of the Code of Conduct is necessary - is the Code not clear? Has the training been unsatisfactory?
- Consider training if the same individual reports similar low level concerns and it is found to be consistent with Code again.

When the information shared does not meet the organisation's expectations and is in breach of the Code of Conduct - a low level concern

- A sensitive and proportionate response is essential;
- Maintain confidence that concerns will be handled promptly and effectively, whilst protecting staff from potential false or malicious allegations;
- Any investigation is on a 'need to know' basis;
- Some concerns may not give rise to further action, others may be dealt with by management guidance and/or training;
- In many cases, a positive/supportive conversation with the individual will enable them to meet expectations moving forward.

If during these conversations the level of concern is raised, the DSL will always seek advice from the Principal and/or Manx Care Social Care Children and Families.

27. Records of all low level concerns will be kept on staff files. The record will include:

- Details of the concern
- The context in which the concern arose

- Action taken
- Name of the individual sharing their concerns (if the individual wishes to remain anonymous, this will be respected as far as reasonably possible).

If a pattern of behaviour becomes concerning, the School may consider using disciplinary procedures and/or a referral to Isle of Man Social Care.

28. Low level concerns will not be reported in references unless they relate to issues that would normally be included in a reference, for example, misconduct or poor performance. However, where a low level concern (or group of concerns) has met the threshold for referral to Isle of Man Social Care and found to be substantiated, it will be referred to in a reference.

29. Low level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

30. Low level concerns will always be reviewed to see what lessons can be learned.

APPENDIX 3: IDENTIFICATION AND RECOGNITION OF ABUSE, NEGLECT AND EXPLOITATION – STAFF GUIDANCE

The identification of child abuse is almost always arrived at through piecing together a variety of factors as in a jigsaw puzzle, rather than there being a definite sign, symptom or injury.

It is dangerous to assemble check lists of indicators of abuse in the belief that this will make identification simple and straightforward.

The key is always one of context. For example, the site and type of injury, the age and development stage of the child, how the parent(s) said the injury happened, what the child said and so on. However, if you suspect abuse has occurred you must always do something. Remember that children can be at risk of harm inside and outside of school, inside and outside of home, and online. You must speak to a Designated Safeguarding Lead if you have concerns.

There are some common areas, which may indicate the possibility of abuse. Remember though that they should never be taken on their own as absolute proof that abuse has occurred:

- Does their explanation tally with the injury sustained?
- Did they seek medical help within reasonable time scale?
- Is there a pattern of recurring injuries/problems with the child?
- What is the parents' general attitude towards the child?
- How do they react to you as a professional?

Diagnosing child abuse is not a simple process. We know that child abuse does occur, and we must be willing, indeed have a duty, to take action to protect children from abuse. An awareness of possible indicators of child abuse means that we are more likely to be able to recognize it and help the child.

Sometimes children may present with signs and symptoms of abuse. Other times there will not be obvious indicators. Please be aware that some children find it difficult to make a direct report: sometimes a friend may make a report or a conversation may be overheard by a member of staff.

Some injuries are highly suggestive of abuse:

- Hand-slap marks
- Grip marks, often visible if a child has been shaken and sometimes the only physical indicator of sexual abuse if a child has been forcibly held by the abuser
- Bruising in unusual positions, including the genital area
- Black eyes, often caused by direct blow, although they may occur from an accidental bang on the bridge of the nose or forehead
- Bite marks, often evidence of bruising, and teeth marks
- A torn fraenum (piece of skin which attaches inside upper lip to gum) may be the result of a direct blow or of an object, being forced into the mouth
- Multiple fractures or fractures of varying age
- Poisoning
- Injuries to the genital or rectal area, including unexplained soreness or bleeding, sexually transmitted diseases and pregnancy
- Poor physical care, including inadequate hygiene, inappropriate dress, constant hunger and lack of attention to medical need
- Unexplained failure to thrive

Similarly, children's behaviour may give clues that they are or have been abused. However, it should be remembered that children show signs of distress for other reasons too e.g. divorce of parents, death of a family member.

Again we have to be cautious and remember that child abuse is one possible explanation for observations of behavioural difficulties.

- A fear of adults generally or certain adults in particular
- Poor peer relationships with other children and an inability to make friends
- Aggression
- Social isolation and withdrawal
- Pseudo-maturity
- Frozen awareness (a combination of lack of expression and watchfulness)
- Detachment
- Sleep disturbance
- Running away
- Eating disorders
- Psychological problems
- Psychosomatic complaints (that is, illness caused by hidden fear or anxiety)
- Low attainment or a sudden drop in School performance
- Self destructive behaviour, including substance abuse and suicide

Contact with parents (unless they are suspected of abuse) is an important component of recognizing abuse – their attitudes, responses and explanations must be evaluated as part of the jigsaw of recognition.

Children have the right to be protected from abuse. This applies regardless of parental circumstances and any sympathy one feels for the parents concerned.

Types of Abuse

KCSIE identifies types of abuse and neglect as follows:

1. **Abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
2. **Physical abuse**: Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy, Munchausen's syndrome by proxy, now referred to as Fabricated Induced Illness (FII).
3. **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some

level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

4. **Sexual abuse**: involves forcing or enticing a child or young person to take part in Sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
5. **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues

1. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES website (www.tes.co.uk), MindEd website (www.minded.org.uk) and also on the NSPCC website www.nspcc.org.uk
2. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- Bullying including cyberbullying
- Children missing education
- Children missing from home or care
- child sexual exploitation (CSE) – see also below
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – see also below
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- Honour Based Abuse – HBA
- mental health
- private fostering
- preventing radicalisation
- sharing nudes and/or semi-nudes
- teenage relationship abuse
- trafficking

Child criminal exploitation and county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Children are targeted and recruited – they can easily become trapped by this kind of exploitation, with threats being made to families and loved ones if they attempt to leave the network. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, child criminal exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be a one off occurrence or a series of incidents over time;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Child criminal exploitation can include children being forced to work in a cannabis factory, being coerced into moving drugs or money across the country, forced to shoplift, or to threaten other young people.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of child sexual exploitation:

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

The experience of girls who are criminally exploited can be very different to that of boys, though it is important that girls are equally at risk. All children who are being criminally exploited may also be at a higher risk of sexual exploitation.
The County Lines Toolkit for Professionals has been written by The Children's Society, Victim Support and the National Police Chiefs' Council: https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

Children who are Absent from Education

A child being absent from education, particularly where it is unexplainable and/or persistent, is a potential indicator of abuse or neglect and can act as a vital warning sign of a range of safeguarding possibilities. It may also lead to them becoming a Child Missing Education. The safeguarding implications may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. 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. The school is aware of the increased risk with Children Missing in Education of Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). The school follows the Isle of Man procedures "Children Missing from Education", s9 parents have a responsibility to inform the school of

reasons for absence. If a pupil is withdrawn from the school, they must notify us immediately of the name of the new school at which the pupil is registered and the date on which they are due to start. Should any pupil leave school without parents giving us these details the school has a duty to inform the Isle of Man Safeguarding Board. All pupils will be placed and removed from admission and attendance registers as required by law. We will collect, where possible, more than one emergency contact number for each pupil. We will inform the local authority of any pupil who fails to attend for a sustained period.

Child Sexual Exploitation

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.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can be a one-off occurrence or a series of incidents over time;
- can take place in person or via technology, or a combination of both (for example being involved in the production of sexual images, being forced to look at sexual images, or being encouraged to act in sexually inappropriate ways;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of child sexual exploitation:

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

Domestic Abuse

Domestic violence and abuse is: any single incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical;

sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. When there has been a case of domestic abuse involving the family of a student at the School, the Isle of Man police will contact the DSL at King William's College before the child arrives at school so that appropriate support can be provided.

Female Genital Mutilation (So Called Honour Based Abuse – HBA)

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff must activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police.

Forced Marriage (So Called Honour Based Abuse – HBA)

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional or psychological. A lack of full or free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties for example). Breast ironing also known as "breast flattening" is the process where young girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage. Staff must activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police. [https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible]

Homelessness

Being homeless or being at risk of becoming homeless present a real risk to a child's welfare. In all case, the Isle of Man Safeguarding Board procedures will be followed and a referral will be made to Isle of Man Social Care.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, raising a wellbeing concern and speaking to the designated safeguarding lead or a deputy.

Following the report of a potential Mental Health concern, the DSL will consult with relevant staff and the Medical Centre. If appropriate, there will also be consultation with parents. Following a consultation, a referral may be made to Isle Listen or CAMHS if appropriate.

Missing Children (Children Missing Education – CME)

Should a child go missing or be unaccounted for, the Missing Student Policy will come into effect.

A child missing education is a potential indicator of abuse. The School will liaise with the Local Authority (Isle of Man Safeguarding Board and Isle of Man Social Services) for children that go missing from education for 10 or more school days without permission or on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in the future.

Serious Violence

All staff and volunteers should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals and groups, a significant decline in performance, signs of self harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possession could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. Further advice is available in the UK Home Office reports "Preventing youth violence and gang involvement" and "Criminal exploitation of children and young adults" listed in Section 1.6, Key Documents.

Sexual Violence and Sexual Harassment

Sexual Violence and sexual harassment can occur between children of any age, both inside or outside of the School. It can happen online and can be between single children or groups of children. There is a zero tolerance approach to sexual violence and sexual harassment. All reports of sexual violence of sexual harassment will be taken seriously and dealt with sensitively.

Sexual violence refers to sexual offences under the Sexual Offences and Obscene Act (2020): Rape, Assault by Penetration, Sexual Assault and Causing someone to engage in sexual activity without consent. A child under the age of 13 can never consent to sexual activity. The age of consent is 16. Sexual intercourse without consent is rape.

Sexual harassment is unwanted conduct of a sexual nature and includes:

- sexual comments – telling sexual stories, making lewd comments or making inappropriate comments about appearance.
- Sexual jokes or taunting
- Physical behaviour – deliberately brushing against someone for example
- Displaying images of a sexual nature
- Upskirting
- Online sexual harassment.

When considering harmful sexual behaviour, also consider if there is any imbalance of power in respect of age and maturity, particularly if there is more than two year's difference. Also, bear in mind that a younger person could be the abuser. Advice will always be taken from the Duty Social Worker.

Preventing Radicalisation

Extremism goes beyond terrorism and is defined in the UK Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including democracy, rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Calls for the death of members of the armed forces is also classed as extremism. Extremists often target the vulnerable – including the young – by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often

combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.
As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Prevent

From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ("the Prevent guidance"). Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools (but also cover childcare).
The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements consider the policies and procedures of Local Safeguarding Boards.
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

Channel

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

APPENDIX 4: SAFEGUARDING CHILDREN: STAFF GUIDANCE

This guidance is intended to supplement the School Safeguarding and Child Protection Policy which all staff must adhere to. It provides detailed guidance on how to behave and what to do if a pupil discloses information to you that may be of a safeguarding nature. This guidance also contains guidance intended to raise awareness on how to protect yourself so that your behavior or actions do not place pupils or yourself at risk of harm or of allegations of harm.

Responding to a pupil disclosing information to a member of Staff

The Deputy Head (KWC)and the Deputy Head (Buchan) are the Designated Safeguarding Leads (DSL). In liaison with the they will co-ordinate action within School.

The School's role is to **identify** abuse, not to investigate. The DSLs should be guided by Social Services. If any form

of abuse is suspected, you are under a duty to report it to the DSL in the School.

Receive

- listen to the pupil and take what they say seriously
- allow the pace of the conversation to be dictated by the pupil
- ask neutral questions which encourage the pupil to talk such as "can you tell me what happened?"
- accept what the pupil says and do not ask for further detail
- note carefully any clearly visible external signs of possible injury or neglect
- if you are shocked by what the pupil tells you, try not to show it
- get advice from the Designated Person if you are not sure what to do

Reassure

- If a pupil says that they want to discuss something privately with you, be alert to the fact that something of a sensitive nature may follow. If the pupil asks for confidential advice or asks "if you can keep a secret" you should make it clear there may be a limit to what secrets can be kept. If you become aware that a disclosure is about to be made that would have to be passed on, stop the pupil and inform the pupil that you may have to pass on the information. On no account should you promise confidentiality which may have to be broken. Say to the pupil "some things are so important I might have to tell them to someone else". Staff must tell the pupil sensitively that they have a responsibility to tell the named Designated Person so that the child can be helped to stay safe and feel better
- In every case, the staff/volunteer should consider whether the pupil is able to provide consent for the information to be shared and if so, seek to obtain that consent. If the pupil does not consent, the staff/volunteer should explain that they need to share the information with the Designated Person and reassure them that the information will *only be disclosed* to other people who *need to know*
- The School recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm
- If a pupil has approached you, don't immediately refer them to the DSL (they have selected you to speak to in the first place). You must at least arrange a carefully-handled changeover of contact point, which the pupil is comfortable with. Always discuss the changeover with the pupil. The pupil should feel supported in this process. The aim is for us to act as responsibly and caringly as possible at all times
- If a disclosure of abuse is made remain calm and explain that the information must be passed on
- Offer encouragement and support that the pupil has done the right thing in reporting the problem
- Be honest

- Empathise with the pupil
- Try to alleviate any feelings of guilt the pupil may show
- Acknowledge how hard it must have been for the pupil to tell you
- Reassure the pupil that they have done the right thing, explain whom you will have to tell (the Designated Person) and why

React

- Explain what you have to do next, and to whom you have to talk
- Inform the DSL

How not to react

Do NOT

- offer confidentiality
- burden the pupil with guilt by asking questions such as "why didn't you tell me before?"
- interrogate the pupil for full details. Cases of abuse may need further investigation. It is better for the pupil if they do not have to repeat details unnecessarily.
- suggest alternative explanations for their worries - listen to the pupil's account
- give your interpretations or assumptions
- criticise the alleged perpetrator
- ask the pupil to repeat everything to another member of staff
- ask any potentially leading questions such as those that start with the words: how, what, when, where and why as this could later be interpreted as putting ideas into the pupil's mind. Limit any questioning to the minimum necessary for clarification. Never attempt to cross – examine or press for evidence.
- undress the child or examine clothed parts of the child's body in an attempt to determine the nature of any such injuries/neglect
- make promises you cannot keep such as "I'll stay with you all the time" or "It will be alright now"

Record

- make brief notes at the time or immediately afterwards which record the date, time, place and context of the disclosure or concern, and what has actually been said, not assumption or interpretation. Notes must be signed and dated
- clearly distinguish between fact, observation, allegation and opinion
- note the non-verbal behaviour and the key words in the language used by the pupil (do not translate into "proper terms")
- complete a Wellbeing Manager concern on iSAMS, keep your original notes and pass them to the DSL. This will give a written record of any allegations made, including the date, time and place where such allegation was made and the identity of the person making it and of the observations made by the pupil, and other relevant circumstances
- provide a labeled diagram to indicate position of any bruising
- appreciate that your records may be used in criminal proceedings or disciplinary investigations.
- do not destroy your original notes, in case a court requires them
- there are no data protection concerns regarding this information, as it is a child protection issue
- the information should be stored by the DSL, away from the pupil's file (as parents have no right to see this information), but there should be a cross reference made in their file
- similarly, any unproven allegations against staff should be kept as a matter of record, but not in the staff member's personnel file; the information should be kept elsewhere confidentially by the School

- some disclosures will require no further action, however, there may be incidents that will need to be reported to external agencies.
- It is important to remember that you are not expected to be a therapist. However, if a pupil has chosen to speak with you, you have already helped and it is important that procedures are followed.
- If you do not wish to speak with the pupil personally, notify the DSL immediately
- act with the utmost discretion. An allegation mistakenly made, whether or not for frivolous or malicious reasons, can have very serious consequences for the person against whom the accusations have been made. Equally, a genuine complaint swept aside can be damaging to the child

Support

- Continue to support the pupil, provide time and a safe space throughout the investigation, and afterwards
- Get some support yourself, **without disclosing confidential information about the pupil**. Receiving a disclosure can be an emotionally challenging experience and can also be traumatic, so find someone to talk to or a quiet place to regroup
- The School will provide continuing support to a pupil who has disclosed abuse through promoting a caring and safe environment within the School and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the School will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised

Staff who have been involved will be provided with support, if needed.

Reporting to the Designated Safeguarding Lead

Any concerns about pupils must be discussed with the DSL as soon as possible and at latest by the end of the School day.

Where the disclosure relates to actual abuse or the suspicion of abuse, the DSL will report the disclosure to Manx Care Social Care Children and Families within 24 hours.

- **Suspicion of abuse** If you have any suspicion of abuse please document evidence and notify the DSL immediately.
- **Be Aware** that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated, or being threatened. This could be due to vulnerability, disability, sexual orientation or language barriers. This should not prevent staff from having a conversation with the DSL if they have concerns about a child.
- **Further Action** Once the matter has been reported, the DSL will coordinate the procedure for dealing with suspected abuse. The DSL will liaise with the Principal in deciding further action, with Manx Care Social Care Children and Families being contacted as necessary. Please note that consent from the parents is generally required to make a referral to Social Care. Only if the child is in immediate danger is consent to make a referral not required.

APPENDIX 5: Linked Policies:

This policy should be read in conjunction with the following School policies. These can be found on the College website or are available on request from the Principal's Office:

AI Policy
Attendance and Registration Policy
Behaviour Management Policy (including Alcohol, Tobacco and Drugs Policy, Anti-bullying policy, Restraint Policy, Search and Confiscation Policy) Complaints Procedure
Complaints Procedure for Students
Data Protection Policy or Pupils, Parents and Staff
Employee Handbook
Equal Opportunities Policy
E-Safety Policy (including Acceptable Use Policies for pupils and staff, Social Media Policy) Gender Questioning Children Policy
Induction of New Staff in Safeguarding Children
Missing Student Policy
Mobile Phone Policy
Recruitment Policy and Appointments Procedure
Staff and Community Code of Conduct
Supervision of Ancillary, Contract and 'Unchecked' Staff Policy
Whistleblowing Policy