



## **Safeguarding and Child Protection Policy**

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### **Introduction**

Wendover fully recognises its responsibilities for safeguarding children. Our students' welfare and safety are at the heart of our school's ethos and in everything we do. In this policy, a 'child' means all children and young people below 18 years of age. In accordance with relevant law and guidance, as set out below in the second section, this policy details our procedures for safeguarding and child protection. It is applicable to the whole school community.

Safeguarding and promoting the welfare of children is everyone's responsibility, whether they work or volunteer in the school. Everyone has a role to play in child protection and safeguarding. At Wendover, safeguarding practices apply to all of our students regardless of age, even beyond the age of 18 if the student is a vulnerable person.

All staff and volunteers will ensure that their approach and actions are child-centred. This means that they will consider, at all times, what is in the best interests of the child. Because of the day-to-day online contact with students, school staff and volunteers are well placed to observe signs of harm, abuse, neglect, Child on Child sexual violence and sexual harassment, victimisation and/or exploitation. As such, all staff in online contact with students and young people are advised to take any disclosures seriously and to be prepared to accept the unacceptable and to accurately record and pass on the details to the DSL.

Whilst many students and teachers may reside outside the UK and all teaching is online, this policy is based on UK legislation and will be used as a guide to appropriate actions to maintain

child protection and safeguarding standards regardless of the global location and online nature of teaching and learning.

The Principal of Wendover Online School is responsible for ensuring that this policy is effective on a day-to-day basis and will review at least annually the systems that are in place in relation to supporting the children and young people in our care as they grow and mature whilst attending our online school.

We are committed to providing a caring, positive, safe and stimulating environment that complements the educational provision the children in our care access whilst they are at school in the UK. Our ethos reflects the articles laid out in the [United Nations Convention on the Rights of the Child](#) (UNCRC) which underpin all aspects of the support we offer to the children in our care.

## 1. Policy aims

Wendover recognises that all learners are entitled to learn in a safe and secure environment, to that end, we are committed to providing an online environment where safeguarding is central. Through this policy, Wendover aims to achieve the following:

- Protect children from maltreatment.
- Prevent impairment of children's mental and physical health and/or development.
- Ensure children are growing up in circumstances consistent with the provision of safe and effective care.
- Undertake a safeguarding and child protection role so as to enable children to have optimum life chances, so they can enter adulthood successfully.

This policy outlines what staff should be aware of, and what to do, should a child, student, young person consciously or subconsciously disclose something that may indicate abuse of some kind. It is also linked to the expected Code of Practice for all staff.

As part of meeting a child's needs, Wendover:

- recognises that sharing information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect. 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. The Data Protection Act (DPA) 2018, the UKGDPR Jan 2021 and the EUGDPR (Where applicable to EU students) do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- recognises that, to facilitate the sharing of 'special category personal data,' the UKGDPR contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- will identify children who may benefit from the early help and early intervention (UK) process and make timely disclosures to the Local Safeguarding Partners (UK) to enable that process to begin. Working with safeguarding partners and other professionals to assist with these assessments and work flowing from these assessments.
- recognises that mental health issues can be an indicator of abuse and neglect and will share any such concerns appropriately.
- will identify students who may be suffering from significant harm and make child protection referrals.
- will identify students who need extra help and make appropriate referrals, including to early help service, to prevent concerns escalating.

As we work in a virtual environment, Wendover also understands the importance of contextual safeguarding, i.e., that incidents or behaviours can be associated with factors outside the school and can occur between children outside of school. All staff should be considering the context within which such incidents and behaviours occur. This is known as contextual safeguarding and simply means that assessments should consider whether wider environmental factors are present in a child's life that present a threat to their safety and/or welfare. For this reason, it is very important that staff recognise the nature of the safeguarding concern as they are not necessarily 'in situ' but may well be more aware of the home environment.

## 2. Legislation and guidance

This policy for Wendover Online School is derived from a variety of UK legislative provisions (whilst recognising that many of our students may reside outside the UK) and statutory guidance. In particular, it is based on good practice found in:

- [Keeping Children Safe in Education](#) (2023). Part 1 is to be read by all staff, Annex A by school leaders and those who work directly with children.
- [Working Together to Safeguard Children](#) (2023).
- Our safeguarding policy and procedures comply with all of this guidance and are updated annually.

The following legislation is also incorporated into this policy:

- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.
- Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by
- FGM are found in Statutory guidance on FGM.
- The Rehabilitation of Offenders Act 1974 outlines provisions for when people with criminal convictions can work with children.
- 'Regulated activity' in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.

- Schools' "PREVENT" duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory guidance on the Prevent duty.

Other statutory provisions relevant to child protection and safeguarding include:

- The Education Act 2002 (section 175/157).
- The Education (pupil information) (England) Regulations 2005.
- Prevent Duty Guidance for England and Wales – September 2015.
- The Sexual Offences Act, 2003, Home Office.
- Teaching on-line safety in schools, DfE, 2019.

A full list of the guidance this policy has referred to, and which staff can refer to for further information, can be found in Appendix 3: The Schools' Statutory Duty.

Young online learners under 8 years old

Wendover Online School's policy reflects the requirements of the UK Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children. It also reflects the provisions of the Statutory Framework for the Early Years Foundation Stage which deals with safeguarding and welfare in the childcare sector.

Related Policies

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the school policies and procedures referred to below:

- The Single Central Record of identity, qualification, and vetting checks for all staff and volunteers.
- The staff recruitment and selection processes, in line with the Children's Workforce Development Council procedures.
- Local Authority policies on dealing with allegations against members of staff.
- The guidelines for visitors.
- The Safer Working Practices guidelines for staff and volunteers.
- The E-safety and Information Technology Acceptable Use Policy.
- Staff Code of Conduct
- Data Protection Policy. (UKGDPR and where applicable to EU Students the EU GDPR)
- Online Safety Policy.
- The guidelines for using a computer and personal technology in school (students).
- The school's 'Ladder of Consequences' in relation to the acceptable use of ICT equipment by students.
- The Behaviour and Anti-bullying Policy.
- The Confidentiality Policy.
- The Health and Safety Policy.
- The Trips and Visits Policy.
- The Whistleblowing Policy.

- Managing Mental Health Policy

### 3. Implementation of Policy Aims

Wendover works to assure the child protection and safeguarding of our students by providing clear direction to all staff and other adults within this policy. This is achieved by:

- Creating and maintaining an online environment where all students feel secure, are encouraged to communicate, and are listened to.
- Making sure that all students know which adults at Wendover they can approach if they have any worries.
- Students are allocated a 121 tutor and attend shared tutorial lessons where they can speak to teachers using our face-to-face video platform.
- They are told to contact teachers or pastoral staff if they have concerns.
- Teaching students to keep themselves safe from all forms of abuse including: child sexual exploitation, female genital mutilation, forced marriage, extremism, radicalisation, and child on child abuse including sexual violence and sexual harassment.
- Appointing an independent Designated Safeguarding Lead (DSL) and senior members of staff from the school leadership team to the role of Deputy DSL.
- Providing effective, relevant and ongoing training and development for all staff. Teachers attend annual online safeguarding training delivered by the school.
- Swiftly and effectively addressing any concerns and ensuring robust, timely referrals are made to other agencies.
- Ensuring effective links with relevant agencies in all matters regarding safeguarding and child protection.
- Reviewing and supporting students who are subject to child protection plans and contributing to the implementation of the plan.
- Keeping meticulous, written records of concerns about students, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately.
- Ensuring the suitability of all staff through safe recruitment practice and maintaining an accurate and up to date Single Central Register (SCR).
- Making sure that all school staff and volunteers understand their responsibilities with regard to safeguarding and child protection in an online context.
- Ensuring that parents and carers also have an understanding of the responsibility placed on the school and its staff for safeguarding and child protection.
- Maintaining awareness of those students who are persistently absent or missing from school, notifying the local authority (UK) in line with 'Children Missing in Education' protocols (UK).
- Maintaining clear procedure in line with the latest guidance for reporting allegations against staff members. Furthermore, Wendover recognises that:
  - some students are at increased risk of abuse.

- some students may not be ready, or know how to tell of abuse, or face additional barriers with respect to recognising or disclosing abuse.

Wendover is committed to recognising diversity and ensures anti-discriminatory practices. We ensure that all students have the same protection. We give special consideration to students who:

- have special educational needs and/or disabilities (SEND).
- are young carers.
- show signs of mental health problems.
- are missing education.
- may experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- are asylum seekers.
- have English as an additional language.
- are known to be living in difficult situations, e.g. where there are issues at home, such as: substance abuse/misuse or domestic violence or where a family member has mental health needs.
- are at risk due to either their own or a family member's mental health needs.
- are within the care system and are looked after or have been previously looked after or have a social worker.

#### 4. Responsibilities

Wendover recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents or carers online has a role to play in safeguarding children.

All staff working (including visiting staff) in Wendover Online School are required to:

- read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE), and review this guidance at least annually.
- be aware of our child protection and safeguarding policy and procedures, including referrals to statutory agencies.
- understand the role of the DSL and know how to deal with children missing from education.
- observe and comply with the Wendover Staff Code of Conduct.
- attend all relevant online training and development provided by the school and be aware of all their responsibilities in line with Keeping Children Safe in Education.
- know how to deal with a disclosure. If a student discloses to a member of staff that they are being abused, the staff member should follow the guidance set out in Appendix 1.
- report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead, or in their absence, the Deputy, in line with the Child Protection Procedures and legal duty for reporting FGM as set out in this policy.
- understand the school's management policy and procedure and know what to do in the event of an allegation made against someone working with children.
- be alert to the signs of harm and abuse, including issues that can manifest themselves due to child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff

should follow the Child Protection Procedures with regards to child-on-child abuse as outlined in this policy. Further information can be found in Appendix 1 and Appendix 2.

- know the Designated and Deputy Safeguarding Lead's name and contact details including telephone numbers and email.
- be aware of the early help process. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

The Senior Leadership Team will:

- assess the impact of this policy in keeping children safe.
- contribute any local, contextual information that may support children's safety and welfare.
- receive and consider regular reports from the Principal about the effectiveness of safeguarding and child protection at the school.
- keep abreast of training to ensure that staff have the skills, knowledge and understanding necessary to keep all children safe.
- review and annually approve the safeguarding policy, ensuring it complies with all law, regulation and good practice. They will also hold the Principal to account for its implementation.
- receive any allegations made against the Principal.

The Principal will:

- be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored.
- ensure that whilst the activities of the Designated Safeguarding Lead (DSL) can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the DSL.
- meet regularly with the DSL.
- ensure that the DSL has appropriate time, funding, training, and resources to fulfil all of their functions and ensure adequate cover in the event that the DSL isn't available.
- ensure that everyone connected to the school is aware of this policy including safeguarding and child protection procedures.
- attend advanced training with an accredited provider.
- ensure that all Wendover staff are vigilant to harm and abuse, are able to identify those students for whom there are child protection concerns, and can make appropriate referrals, including to early help services.
- ensure staff training includes the need to recognise lower level concerns which do not meet the safeguarding threshold but which need monitoring and reporting.
- be alert to the signs of harm and abuse and specific safeguarding issues including but not limited to: Child Sexual Exploitation (CSE); Child Criminal Exploitation including County Lines activity; serious violent crime including serious violent sexual offences; Child on Child abuse, FGM, and radicalisation. Child-on-child abuse can manifest itself in many ways but often in bullying (including cyber bullying) gender-based violence / sexual assaults and sexting. Staff should follow the Child Protection Procedures with regards to child-on-child abuse as outlined in this policy.
- appoint a designated teacher to promote the educational achievement and welfare of students who are looked after and to ensure that this person has appropriate training.
- communicate clearly to school councillors, visitors, parents, and students so everyone understands the school's safeguarding policy and procedures.

- appoint a DSL and Deputy DSL giving consideration to the range of responsibilities the DSL undertakes, e.g. the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences.
- ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff online areas and the website (along with this policy).
- report to the Governing Body regularly regarding the effectiveness of safeguarding and implementation of related policies.
- ensure safe recruitment practice is followed when recruiting for posts, and ensure appropriate action is taken when an allegation is made against a member of staff.
- ensure all appropriate checks are made in relation to all staff, volunteers, and visitors, including Section 128 checks for School Governors.
- ensure the school offers a safe environment via a robust health and safety policy and procedure to meet the statutory responsibilities for the safety of students and staff at the school.

The Designated Safeguarding Lead is responsible for:

- being available for all staff to discuss any safeguarding issues or concerns.
- ensuring all staff are aware of the DSL and Deputy DSL contact details.
- ensuring that all cases of suspected or actual problems associated with child protection or safeguarding concerns (including cases where the early help process may be appropriate) are referred to the appropriate agencies in line with procedures set out in this policy, keeping the Principal apprised.
- ensuring the school's safeguarding policy and practice is relevant and consistent with the most recent statutory guidance outlined in Appendix 3 and 4.
- being aware of the latest national and local guidance and requirements and keeping the Principal and staff informed as appropriate.
- attending accredited, enhanced training each year, as required to fulfil the role.
- ensuring that appropriate online training for staff (including periodic updates via e-bulletins, email, or as part of staff meetings) is organised according to the agreed programme with the Principal and renewed through ongoing professional development.
- ensuring families are fully aware of the school policies and procedures and kept informed and involved.
- ensuring that effective communication and liaison takes place between the school and the Local Authority or partner agencies, and any other relevant agencies, where there is a safeguarding concern in relation to a student.
- ensuring that all staff have an understanding of child abuse, neglect, and child-on-child abuse (including serious violence and serious sexual violence, Child Criminal Exploitation, FGM, and Prevent) and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities (SEND). Including the need to recognise lower-level concerns which do not meet the safeguarding threshold but which need monitoring and reporting.
- maintaining details of any looked after child's social worker and the name of the Virtual School Head (in the authority that looks after the child).
- dealing with allegations of abuse, including assessments for early help, in accordance with local and statutory procedures.
- supporting the staff member in liaising with other agencies and setting up an interagency assessment as appropriate if early help is appropriate.
- ensuring that adequate reporting and recording systems are in place.



- ensuring relevant records (and further information not contained in the child's child protection file) are passed on appropriately when students transfer to other schools, or are being educated at alternative provision or off-site education.
- being aware of children who are or who may be living in a private fostering arrangement. The Local Authority Private Fostering Officer is known to the school and ensures liaison to support the welfare and safety of the child.
- undertaking the Children and Safeguarding Board Executive (LSBC) annual safeguarding audit.
- referring suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police either in the UK or student's country of domicile in the case of being overseas), and support staff who make such referrals directly.
- contributing and helping other staff to contribute to early help assessments.
- meeting regularly with the Principal to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work. Other key staff will be invited as appropriate. Safeguarding matters arising will be discussed routinely at each staff and/or Senior Leadership Team (SLT) meeting.
- sending out a termly safeguarding bulletin to the whole school community, including parents.

## 5. Child Protection Procedures

### 5.1. Staff protocols

Staff at Wendover will follow the necessary child protection procedures if an incident occurs.

They will be made aware that:

- where a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately (this will be in the country of domicile in the case of a student who is being taught overseas – see Appendix 5).
- anyone can make a referral.
- staff should not assume that somebody else will take action/share information that might be critical in keeping children safe.
- where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.
- the reporting of concerns relating to Female Genital Mutilation (FGM) is mandatory in the UK and should be regarded as the same elsewhere in the world.
- the DSL or Deputy DSL will always be available to discuss safeguarding concerns.
- when a member of staff at Wendover suspects that any student may have been subject to abuse, or a student has suggested that abuse has taken place either to themselves or another student, the allegation must be reported immediately to the Designated Safeguarding Lead (DSL) or the Deputy DSL if the DSL is off-site.

The DSL or Deputy DSL will:

- ensure the allegation is acted on within the school day.
- ensure that the Principal is informed of all allegations unless the allegation is against the Principal, in which case the Senior Leadership Team will be informed.

- deal with the allegation in accordance with the agreed procedures. In the case of a violent sexual assault or sexual harassment matter, Wendover will follow the latest procedures as set out in Keeping Children Safe in Education 2023, see Appendix 4.
- be best placed to carry out a risk assessment of the issue and determine the escalation and timescales for dealing with the allegation. It is best practice to ensure that all colleagues who are involved in the allegation are informed of the outcome, so there is closure or continual vigilance as necessary.

## **Allegations of Abuse**

Appendix 1 provides guidance and detail about:

- specific procedures about how to deal with a disclosure.

Appendix 2 provides information about:

- each child abuse category.
- potential signs / risk indicators of abuse.

### 5.2. Female Genital Mutilation (FGM)

The FGM Mandatory Reporting Duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires teaching staff to make a report to the police where, in the course of their professional duties, they either:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or they
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

### 5.3. Allegations Against Members of Staff

All allegations of abuse made against a member of staff (including supply teachers and volunteers) in relation to a student must be brought to the attention of the Principal and where appropriate the Designated Safeguarding Lead immediately. The Principal will act in a co-ordinating role.

In the event the Principal is the subject of the allegation, the DSL will report to the Senior Leadership Team immediately to establish (as outlined in KCSIE) 'the nature, content and context of the allegation' and agree the appropriate course of action. In some cases, allegations may be so serious that they will require immediate intervention by the police and/or children's social care services.

If the allegation against an online teacher or other member of staff (including supply teachers and volunteers) meets any of the following criteria, the Principal (or other lead person) must report it to the Local Authority Designated Officer (LADO) (UK) the same day:

- They have behaved in a way that has harmed a child, or may have harmed a child.
- They possibly committed a criminal offence against, or related to, a child.
- They have behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- They have behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

For other allegations, the Principal and DSL will decide if further enquiries are required prior to referral to the Local Authority Designated Officer. Where the Principal considers that a referral may be warranted under Child Protection Procedures and an allegation appears to meet the criteria, the Principal will inform the Local Authority's Designated Officer (UK) or the local police in the case of a student residing overseas. The Local Authority's Designated Officer (LADO) must be informed of all allegations that come to the school's attention that meet the criteria, so that s/he can consult the police and social care colleagues as appropriate. The Local Authority Designated Officer should also be informed of any allegations that are made directly to the police or to children's social care. All alleged physical injuries must be investigated by the appropriate external agencies.

Where online students are based in countries other than the UK, local procedures will be followed, the local police service will be a primary contact in the event of a safeguarding issue.

#### 5.4. Whistleblowing

Where a staff member at Wendover feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

*Refer to the Staff Grievance, Disciplinary, Capability and Whistleblowing Policy for further information.*

General guidance on whistleblowing can be found via: <https://www.gov.uk/whistleblowing>

The NSPCC's 'Report child abuse' dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school. Staff can call 0808 800 5000, which is available from 11:00-15:00, Monday to Friday, and/or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

#### 5.5. Training for staff

Wendover Online School ensures all staff complete safeguarding and child protection training as part of their induction. Given the specialised nature of teaching online, attention will be drawn to the ways that staff need to be aware of issues that may occur. The school also has a commitment to updating training for all staff each year, particularly in the light of online learning becoming a more prevalent method of delivery. Wendover will look for opportunities to maintain and update knowledge and advice regarding safeguarding and child protection when teaching online. If required, appropriate staff will be enabled to attend Local Authority and Inter-Agency Safeguarding Board Meetings (UK).

To achieve this:

- Time will be given to enable this commitment to be met.
- The Designated Safeguarding Lead (DSL) and Deputy DSL will receive relevant training bi-annually plus informal updates every year.
- All staff and volunteers new to the online school will be given appropriate safeguarding training as part of their induction programme to the school. Updates will feature regularly in all staff and SLT meetings, as appropriate.
- All school staff will undertake the training at least every two years as organised by the DSL.

- Newly recruited online staff will complete the online training as part of their induction and will receive school-specific training, including being made aware of local risk factors for extremism.
- The DSL will attend Local Authority and other training courses as necessary and other appropriate inter-agency training every year.
- The DSL will attend Prevent training (WRAP) as provided by the Home Office and Local Authority.
- The Principal will attend advanced training with a designated provider.
- The Senior Leadership Team and Pastoral Leaders will attend training with a designated provider.

#### 5.6. Suitability of staff and safe recruitment practices

Wendover recognises that safe recruitment practices are an essential part of creating a safe online environment for children and young people. Consequently, we will ensure that staff (including supply teachers and volunteers) working at the school are suitable to do so and therefore do not pose any kind of risk to our students. Appropriate members of SLT and other relevant staff are required to complete Safer Recruitment Training in order to ensure that one panel member on every selection panel is trained in ‘Safer Recruitment.’ Further details regarding Safer Recruitment are to be found in Wendover’s Safer Recruitment Policy.

### 6. Prevent duty – Safeguarding students who are vulnerable to extremism

#### 6.1. The school’s Prevent Strategy

Wendover follows the statutory guidance on the school’s responsibility to fulfil our Prevent Duty. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism. It is rare for children to become involved in terrorist activity. However, some students from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, the school takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

In line with both the fundamental British Values and the School Values, the following key principles underpin the community in which the school is based:

- Inclusion.
- Tolerance.
- Freedom of speech.
- The expression of beliefs and ideology.

Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

Free speech is subject to treating others with respect, understanding differences, equality, maintaining an awareness of human rights, community safety, and community cohesion. The Prevent statutory guidance requires school to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable.

Wendover is committed to working with the local authority (UK) and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of terrorism. The DSL will keep up to date with all local policies and procedures relating to Prevent. Staff must consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care.

## 6.2. Visiting speakers

As an online school, we value the contribution of our outside speakers. Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on the school teaching platform, will be supervised by a school employee. On attending the school, visiting speakers will be required to show an original current identification document that includes a photograph, such as a passport or photo card driving licence, copies of which will be maintained by Wendover. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

## 6.3. Reducing risks of extremism

The Principal and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk.

Actions will include consideration of:

- Relationship Education (for all primary pupils) and Relationship and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools); Wendover considers these subjects to be very important in a child's education and preparation for adulthood.
- SEND policy.
- Assembly content.

Risk assessments will include:

- The use of school platforms by external agencies.
- Integration of students by gender and SEND.
- Anti-bullying policy.
- Other issues specific to the school's profile and community.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist/radical ideology. As with managing other safeguarding risks, all school staff will be vigilant to changes in students' behaviour which could indicate that they may be in need of help or protection. It is commonly recognised that children at risk of radicalisation may display changes in behaviour, show different signs or seek to hide their views. Staff are advised to use

their professional judgement in identifying students who might be at risk of radicalisation and always act proportionately and seek support if they are concerned. The school recognises that the Prevent duty does not ask teachers to carry out unnecessary intrusions into family life, but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

#### 6.4. Potential signs of radicalisation and extremism

There is no limit to the signs that you might notice – every student is different. However, regardless of the teaching and learning taking place online, some of the indicators staff should look out for include:

- Vulnerability: identity crisis, personal crisis, migration, unmet aspirations, and history of criminality.
- Access to extremist influences: friendship groups, internet activity, activities abroad i.e. military camps, and vocalised support of illegal or extremist/militant groups.
- Experiences and influences: social rejection, personal impact from civil unrest and widespread media coverage of international events, change in appearance and behaviour, family conflict over religious reviews, and verbal or written evidence of support for terrorist activities.
- Travel: pattern of regular extended travel, evidence of falsifying identity documents, and unexplained absences.
- Social factors: disadvantaged background, lack of empathy and/or affinity with others, severe learning difficulties or mental health, being a child of a foreign national or refugee, experience of trauma or sectarian conflict, and extremist views of a significant other.

It is always worth remembering that numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most children or young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation. For example, they may address mental health, relationship, or drug/alcohol issues.

#### 6.5. Response

Wendover will appoint a Prevent Single Point of Contact (SPOC) to be the lead within the school for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. This will be the DDSL.

#### 6.6. SPOC Responsibilities

##### 6.6.1. Raising Awareness

The Prevent Single Point of Contact (SPOC) role is to raise awareness in relation to all aspects of Prevent and the counterterror agenda generally. They also promote the necessity to safeguard vulnerable children and adults from being exploited and recruited into violent extremism, this is particularly important in an online environment where trust develops very quickly between students and staff. It is expected that the SPOC will ensure that staff are aware of the role and its responsibilities. SPOCs are also expected to provide advice and guidance to staff within their school. The Channel coordinators (UK) have a range of training packages

available to help raise awareness. The aim of training the trainers is to streamline the safeguarding agenda and give everyone the necessary knowledge.

#### 6.6.2. Receiving Referrals

It is expected that if a staff member within the online school identifies an individual vulnerable to radicalisation, they will contact the SPOC and/or DSL first to discuss the case internally. They should be asked to record their concerns and raise it, as they would with any other safeguarding concern, with the school and where relevant with the local authorities in students' domiciliary countries. If deemed suitable, the staff member will be asked to complete the Referral and Assessment Form (RAF). This should then be emailed to the Channel coordinator at: [channel.project@gmp.police.uk](mailto:channel.project@gmp.police.uk)

The Channel Officer will then carry out an extensive risk assessment that aims to identify known risks and additional vulnerabilities. At no point will the person be recorded on a criminal records system as a result of being involved in this process. The coordinator will then complete a case summary and return it to both the SPOC and the staff member. The SPOC should then arrange a multi-agency safeguarding meeting with the necessary professionals to support the vulnerable individual. Channel can assist this process by using our list of SPOCs from other agencies to help ensure the right people are brought to the multi-agency meeting.

In addition to the above, links with the local Channel lead can be made by the DSL and where necessary, individual cases will be referred to the local Channel panel for screening and assessment.

More information on Channel Programme:

<https://www.gov.uk/government/publications/channel-guidance>

#### 6.7. Training

Wendover will ensure that the DDSL and SPOC (if different) will complete a local Workshop to Raise Awareness of Prevent (WRAP) and that this training will be cascaded to staff as part of the annual CPD training programme. This will be the responsibility of the DDSL/SPOC.

7. Safeguarding students who are vulnerable to exploitation, child sexual exploitation, honour-based abuse (forced marriage and female genital mutilation), and at risk from or involved with violent crime and peer-on-peer abuse.

All staff at Wendover will be provided with an awareness of safeguarding issues that can put children at risk of harm, whilst lessons are online, it is still possible to encounter each of these instances as well as others. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) put children in danger.

#### 7.1. Children Missing From Education

All Wendover staff should be aware that children who go missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation, and can also be a sign of child criminal exploitation including involvement in county lines. It may also 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 risks and to prevent the risks of a child going missing in future. All staff should be aware of Wendover's unauthorised absence and children missing from education procedures, which are set out in section 9.

## 7.2. Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Even as an online school staff should make themselves aware of issues surrounding county lines.

How do you know if county lines drug dealing is happening in your area or to the students that you teach online? Some signs to look out for include:

- Information of an increase in visitors and cars to a house or flat.
- Information of new faces appearing at the house or flat.
- Information of new and regularly changing residents (e.g. different accents compared to local accent).
- Change in resident's mood and/or demeanour (e.g. secretive/ withdrawn/ aggressive/ emotional).
- Information of substance misuse and/or drug paraphernalia.
- Changes in the way young people you might know dress.
- Unexplained, sometimes unaffordable new things (e.g. clothes, jewellery, cars etc).
- Residents or young people you know going missing, potentially for long periods of time.
- Information of young people seen in different cars/taxis driven by unknown adults. Young people seeming unfamiliar with your community or where they are.
- Truancy, exclusion, and disengagement from school.
- An increase in anti-social behaviour in the school community.
- Unexplained injuries.

All staff should be aware of the associated risks and understand the measures in place to manage these.

All staff at Wendover will be made aware of the indicators that may signal children are at risk from, or are involved with, serious violent crime. Signs may include:

- Increased absence.
- Change in friendships.
- New relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm.
- Significant change in wellbeing.



- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Indicators of Child Criminal Exploitation (CCE) can include a child:

- appearing with unexplained gifts or new possessions.
- associating with other young people involved in exploitation.
- suffering from changes in emotional wellbeing.
- misusing drugs and alcohol.
- going missing for periods of time or regularly coming home late.
- regularly missing school or education.
- not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team (UK) and the police local to the student, if appropriate.

### 7.3. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs when 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:

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation. These signs may be evident in behaviour that Wendover staff witness online, in comments made by other students or in email trails that might be sent in error.

Signs include:

- Underage sexual activity.
- Inappropriate sexual or sexualised behaviour.
- Sexually risky behaviour, 'swapping' sex.
- Repeat sexually transmitted infections.
- In girls, repeat pregnancy, abortions, and miscarriage.
- Receiving unexplained gifts or gifts from unknown sources.
- Having multiple mobile phones and worrying about losing contact via mobile.
- Having unaffordable new things (clothes, a mobile phone, etc.) or expensive habits (alcohol, drugs, etc.).
- Changes in the way they dress.
- Going to hotels or other unusual locations to meet friends.
- Seen at known places of concern (e.g. brothels).

- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in/out of different cars driven by unknown adults.
- Having older boyfriends or girlfriends.
- Contact with known perpetrators.
- Involved in abusive relationships, intimidated, and fearful of certain people or situations.
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers.
- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with school, opting out of education altogether.
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, etc.).
- Mood swings, volatile behaviour, emotional distress.
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.

#### 7.4. Honour-based Abuse: Forced Marriage (FM)

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14-16 years old originating from Pakistan, India, and Bangladesh (approx. 60% of the cases) together with a percentage of cases of children originating from the Middle East and African countries.

As an online school, all staff at Wendover should be vigilant to the signs of honour-based abuse and forced marriage. A signal of FM is the removal of the students from school and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings.

Any member of staff at Wendover with any concerns should report this immediately to the DSL, who should raise the concern with the Local Police Safeguarding Unit by email or phone. Never attempt to intervene directly as a school or through a third party. Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.

#### 7.5. Honour-based Abuse: Female Genital Mutilation (FGM)

There is a specific legal duty on teachers regarding FGM. If, during the course of their work, a member of Wendover staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the police. All staff at Wendover will recognise this responsibility and must be vigilant.

The 'One Chance' rule

As with Forced Marriage, there is the 'One Chance' rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the school takes action without delay.

What is FGM?

Female genital mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

Why is it carried out?

It is often based on a belief that FGM:

- brings status/respect to the girl – social acceptance for marriage.
- preserves a girl's virginity.
- is part of being a woman/rite of passage.
- upholds family honour.
- cleanses and purifies the girl.
- gives a sense of belonging to the community.
- fulfils a religious requirement.
- perpetuates a custom/tradition.
- helps girls be clean/hygienic.
- is cosmetically desirable.
- is mistakenly believed to make childbirth easier.

FGM IS A CRIMINAL OFFENCE. There is no justification for this procedure.

All staff at Wendover will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM. All teachers have a mandatory responsibility to report FGM if they discover it (through disclosure not physical examination) to the police and informing the DSL immediately who will support (the Deputy DSL will take on this responsibility if the DSL is not available). As an online school, it is particularly important to be vigilant to conversations that staff may have with children where they may disclose information.

Circumstances and occurrences that may point to FGM happening include:

- The child talking about getting ready for a special ceremony.
- The child and their family taking a long trip abroad.
- The child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghanistan, Kurdistan, Indonesia, and Pakistan).
- Knowledge that the child's sibling has undergone FGM.
- The child talking about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities.
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.

- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinary tract infection.
- Disclosure.

#### 7.6. Child-on-child abuse

All staff at Wendover will be made aware that children can abuse other children (formerly referred to as peer-on-peer but now child-on-child to reflect possible age differences). Whilst this is most likely to include online abuse, it is important to remember that some of our students may know each other outside the school and may live close by. Instances of child-on-child abuse may include:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Up-skirting, which is a form of abuse that has been high on school and court agendas for a number of years and is a criminal offence in its own right under the Voyeurism (Offences) Act 2019. Up-skirting occurs when someone takes a picture under a person's clothing, with or without underwear, without them knowing or without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm. It is a common aspect of child-on-child abuse and can happen to any gender.
- Sexting (also known as youth produced sexual imagery).
- Initiation/hazing type violence and rituals.

#### Sexting

Your responsibilities when responding to an incident:

Should any staff member be made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), it must be reported to the DSL immediately.

You must not:

- View, download, or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves, or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL. This policy on sexting should also be shared with pupils so they are aware of the processes the school will follow in the event of an incident.

8. Procedure for students identified as being 'at risk' or vulnerable to exploitation, child sexual exploitation; honour-based abuse (forced marriage and female genital mutilation), children who are at risk from or involved with violent crime and child-on-child abuse

Where risk factors are present, as identified in online lessons or in other online email contacts, but there is no evidence of a particular risk, the DSL/SPOC at Wendover will advise staff on preventative work that can be done within the school to engage the student into mainstream activities and other external social groups. The DSL may well be the person who talks to the student's family where appropriate, sharing the school's concern about the student's vulnerability and how the family and school can work together to reduce the risk.

In this situation, depending on the level of concern and agreement with the parent and the student (as far as possible):

- The DSL/SPOC can decide to notify the Multi-Agency Safeguarding Hub (MASH) (UK) of the decision so that a strategic overview can be maintained, and any themes or common factors can be recognised, for overseas students local agencies will be contacted where known and/or the police service local to the student.
- The school will review the situation after taking appropriate action to address the concerns.
- The DSL/SPOC will also offer and seek advice about undertaking an early help assessment and/or making a referral to Social Services or involving the local Safeguarding partnership Children's Board. If the concerns about the student are significant and meet the additional needs/complex need criteria, s/he will be referred to the MASH (UK). This includes concerns about a student who is affected by the behaviour of a parent or other adult in their household. For overseas students, the advice of the police service local to the student will be sought.

## 9. Children Missing in Education

All students, regardless of their circumstances or background, are entitled to full-time education that is suitable to their age, ability, aptitude, and any special educational needs and disabilities. This stance is maintained in the delivery of our online school provision. We recognise that by its very nature online learning can move geographical location with the child, as a result it is hoped that regardless of location the student would be able to join the lessons successfully.

Wendover operates a strong attendance tracking system that is overseen by a member of the leadership team. When children are absent, teachers report back to management within minutes of the start of the lesson and parents/carers are contacted immediately. Where a child is persistently absent, meetings will be sought with parents and carers to identify strategies to meet the child's needs or to discuss alternative options.

Teachers record attendance electronically for every lesson and attendance figures are reviewed on a weekly basis. The tracking and use of effective attendance management strategies enables the school to ensure each day that every child is accounted for.

The school will only authorise leave of absence in exceptional circumstances. The Principal will determine the length of time that the child can be away from the school. In most cases absence can be avoided where there is access to the internet and the student has the relevant online access regardless of geographical location.

The school recognises that some children seeking leave of absence are vulnerable to risk of abuse, neglect, or travelling to conflict zones, or at risk of FGM or forced marriage. Attendance staff are trained to look out for these triggers and the school works in partnership with the Local Authority (UK) to ensure localised risks are particularly taken note of and shared with all staff. Staff who have pastoral responsibility undergo training on attendance and safeguarding issues on an annual basis. Where an issue is identified, staff should alert the DSL and Principal. The DSL will, as soon as a concern is established, alert the Local Authority (UK) or the local police in the case of a student being located overseas.

As a matter of course, student absence must be followed up on a daily basis – this must be a priority. Unless circumstances indicate that a student is at risk and immediate action is necessary, the Local Authority (UK) will be informed of every student who has a continuous period of unexplained absence of three days or more, as per UK guidance. As an online school with multiple communication channels to parents and carers, we would seek clarification of the reason for absence immediately if we had not heard from them in advance.

The admissions register at the school is kept up to date noting students who are removed from the school roll when they:

- have been taken out of school by their parents and are being educated outside the school system, e.g. home education.
- have ceased to attend Wendover Online School.
- have been certified by a medical doctor as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither s/he nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age.
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period.
- have been permanently excluded.

No student will be removed from the school roll until all safeguarding checks have been completed or the whereabouts of a student have been established.

## 10. Domestic Abuse

As an online school, we recognise that we see students in their domestic environment so it is critical that we are aware of the potential for abuse to occur here. Domestic violence and abuse refer to any 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. 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.

### Operation Encompass (UK)

This initiative helps police and schools work together to provide emotional and practical help to children who have been involved in domestic abuse. When the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) before the child or

children arrive at school the following day. This ensures that the school has up to date and relevant information about the child's circumstances and can enable support to be given to the child according to their needs. DSLs should endeavour to alert relevant pastoral support staff as soon as possible where this is appropriate.

More information can be found here: <https://www.operationencompass.org/>

Police forces not signed up to operation encompass will have their own arrangements in place. Notwithstanding, Wendover will provide support from pastoral tutors for students should we be informed that they find themselves in these circumstances and will do the utmost to link students with support networks in their local country should they be based overseas.

## 11. Online Safety

Wendover's Responsible Use Policy and Acceptable Use Agreements can be found on the school website or upon request. All staff will be made aware of their contents which are central to all teaching and learning activities in the school. These and related policies must be read alongside this document and in conjunction with the DfE guidance: Teaching online safety in schools, 2019 <https://www.gov.uk/government/publications/teaching-online-safety-in-schools> Children must be safeguarded from potentially harmful and inappropriate online material. As such, the school advises parents and carers to ensure appropriate filters and appropriate monitoring systems are in place and all Wendover staff are advised that they must check online teaching materials prior to sharing with students to make sure that content is suitable for sharing.

Online safety is included in our curriculum provision in PSHE and other subjects and ensures children are taught about safeguarding, including online, through teaching and learning opportunities. This may include covering relevant issues through a variety of lessons and learning opportunities. Although appropriate blocking is essential, it does not restrict our students' learning or lead to unreasonable restrictions as to what our students can be taught with regards to online teaching and safeguarding. This policy sets out specific measures that ensure students in the school work safely, including protection from terrorist or extremist material, peer abuse, and bullying via online platforms, including sexting.

## 12. Opportunities to teach safeguarding

Wendover will ensure that children are taught about safeguarding. This may include covering relevant topics through learning in general but is covered particularly in Relationships Education and Relationships and Sex Education. This will be delivered through, but not exclusively, PSHE lessons. The subject of Relationships and Sex Education has been mandatory since September 2020. Other learning opportunities will be found in tutorial sessions both 121 and shared as well as in all other taught lessons, as appropriate.

## 13. Looked after children

Where looked after children are in Wendover Online School, they will be allocated pastoral support as per our programme and staff will be informed of their circumstances to ensure that teaching and delivery of the curriculum is sensitive to their needs. All Wendover staff will have an awareness of issues around safeguarding looked after children. The leadership team will ensure that staff have the skills, knowledge, and understanding necessary to keep looked after children safe.

Staff will be aware of the legal status of a looked after child's care arrangements. In particular, they will ensure that appropriate staff have the information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the student's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL will have details of the student's social worker and the name of the virtual school head in the authority that looks after the student. The Principal will appoint a Designated Teacher/Tutor to promote the educational achievement of students who are looked after and to ensure that this person has appropriate training.

#### 14. Liaison with the Virtual School Head

Where applicable, contact with the Virtual School Head will be used appropriately with relevant documentation and progress provided. Virtual School Heads receive funding based on the latest published numbers of children looked after in the authority. The school's Designated Teacher for looked after children will work with the Virtual School Head to monitor the child's welfare and discuss how funding can be best used to support the progress of the child and meet the needs identified in the student's personal education plan.

#### 15. Students with a social worker

We recognise that children with social workers can need extra support. A child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- responding to unauthorised absence or missing education where there are known safeguarding risks.
- the provision of pastoral and/or academic support.

#### 16. Children who harm other children (child-on-child abuse)

Wendover recognises that children are capable of abusing other children, particularly when using technology. Examples of this may include when children are violent or cause danger towards other children which may not be face to face, it could well be online in nature. It can also be when children sexually abuse or sexually harass other children – please refer to Appendix 2.

Where a student's behaviour causes significant harm to other students, staff should follow the child protection procedures for the school. The DSL will refer the child in line with the local area safeguarding protocol for these children.

Staff at Wendover will respond to situations where there is child-on-child abuse, be this in person or online, with appropriate investigations and safeguarding procedures. Records will be kept of the incident and consideration of actions to resolve the situation. Perpetrators will be expected to respond positively to investigations and to understand why their behaviour has been unacceptable. Where appropriate; external agencies will be contacted. Where



necessary, the perpetrator will be asked to leave the institution. The victim will be supported by pastoral staff and means to accommodate their needs will be put into place to enable them to feel safe in their education.

## 17. Confidentiality and Record Keeping

Staff at Wendover have a professional responsibility to share relevant information about the protection of children with the DSL and potentially external investigating agencies, where possible, under the guidance of the DSL. If a student confides in a member of staff, either in person during a live video call lesson or in writing (email) and requests that the information is kept secret, it is important that the member of staff tells the student sensitively that s/he has a responsibility to refer the matter to the DSL. Accurate, signed, and dated written notes must be kept of all incidents or child protection concerns relating to individual students. If a teacher or any other staff have a child protection concern, they should inform the DSL or Deputy DSL as soon as possible. These will be kept on the student's child protection file.

Child protection records must be retained securely. Arrangement for child protection documents must comply with the schools Data Protection Policy together with data protection law and regulation applicable at the time. The DSL will ensure that all child protection records are held separately from other student records. Child protection files and documents will be stored securely, by encryption and/or password protecting electronic files or ensuring that paper records are in a locked cabinet with restricted access. Information from child protection files will only be shared with relevant staff when it is necessary to do so and in a manner that is consistent with data protection law.

If the school receives a request for direct access to, or copies of, school documentation held on a child protection file, the Principal and DSL will be informed and a decision taken on the appropriate way forward in accordance with the GDPR Policy.

In the event of a student who is being dealt with under the school's child protection procedures transferring to another school, the school will:

- Find out the name of the receiving school (and, where appropriate, the Local Authority).
- Contact the relevant member of staff at that school to discuss the transfer.
- Securely send all information relating to the student to the receiving school (and, where relevant, the Local Authority).
- Check with the receiving school that the student has actually arrived there on the expected day (and inform all relevant agencies of the transfer).

Any external individual or organisation contracted by the school to work with school students must report any child protection incidents or disclosures from students to the Principal or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the school, be required to work in accordance with the school's child protection and safeguarding policy. The school has in place data sharing agreements and complies with all relevant data sharing protocols.

## 18. Working with parents / individuals with parental responsibility

As an online school, Wendover recognises the importance of working, where appropriate, in partnership with parents and carers to ensure the welfare and safety of our students. We aim to maintain close contact with parents and carers and provide regular updates on student performance.

The school will therefore:

- make parents aware of the school's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on, where necessary, by making all policies available on the website and on request.
- work with parents to support the needs of their child.
- consider the safety of the student and, should a concern arise, the DSL has the responsibility to seek advice prior to contacting parents.
- aim to help parents understand that Wendover Online School has a responsibility for the welfare of all students, based both in the UK and offshore, and has a duty to refer cases to the Local Authority or local police in the interests of the student as appropriate.
- ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- provide advice and signpost parents and carers to other services where students need extra support.

## 19. Health and Safety

The Principal of Wendover Online School will ensure that there is a robust, up to date Health and Safety Policy and Procedure to meet the statutory responsibility for the safety of students and staff at the school. The Principal will identify and manage health and safety through the use of risk assessments, which are carried out:

- on an annual basis for the school learning spaces and environment in and outdoors.
- for all school trips and educational visits.
- for all work-based learning on work experience or volunteer placements.
- when a student returns following an exclusion due to risky or violent behaviour.
- when there are any changes to the premises or practices.
- following a serious accident in relation to staff and/or students.
- when there is a high-level risk associated with contact with parents.
- to maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage, including cyber-attack.

Visitors and contractors will be expected to:

- report to a pre-arranged Wendover member of staff on arrival.
- provide proof of identity.
- ensure their full name is visible in all face-to-face online lessons.
- receive suitable supervision by school staff when in lessons.
- be made aware of the arrangements for safeguarding and health and safety.
- comply with the relevant vetting checks specified through the school's recruitment process.

## 20. Equal Opportunities

Wendover Online School must take into account the Safer Recruitment and Equal Opportunities Policy and the Admissions Policy when discharging their duties under this policy.

## 21. Inspection Procedures

The Department for Education's inspections of online schools will be carried out under the [Online Education Accreditation Scheme \(OEAS\)](#). Ofsted inspectors, acting on behalf of the DfE, will always report on whether or not arrangements for safeguarding children and learners are effective.

Wendover Online School will apply for accreditation under the new scheme during the 2023-24 academic year.

## 22. Monitoring and Review of this Policy and Safeguarding Contacts

The Designated Safeguarding Lead (DSL) at Wendover will monitor the implementation of this policy and will report as required to the Principal and the Senior Leadership Team. It will be reviewed annually and will also include:

- reviews of Wendover's induction procedures for new staff.
- surveys and questionnaires to gather feedback from the children and young people in our school.
- parent surveys and questionnaires.
- scrutiny of a range of risk assessments.
- scrutiny of logs of safeguarding concerns.
- reviews of logs of bullying/cyberbullying/racist/behaviour incidents.
- reviews of parental concerns and parent questionnaires.

### **Policy review**

This policy is designed to set good practice standards. However, the school recognises that best practice develops over time and, as such, will update it regularly in light of experience and as a result of changes in legislation or its own internal organisation and policies. As with all Wendover policies, this policy will be reviewed according to our comprehensive policy review calendar.

Date of policy: September 2023

Date of review: September 2024

## Appendix 1: Staff Guidance

### Procedures in respect of Child Abuse

Link to safeguarding form

Child abuse exists where children have been physically or emotionally abused or severely neglected. Abuse of children is likely to be noticed by the school staff and Health Workers or Education Welfare Officers. It is essential, therefore, that all those whose work brings them into contact with children and their families know the signs of child abuse and are aware of the procedures that they must follow to safeguard the child. Part one of [Keeping Children Safe in Education 2023](#) should be referred to for a list of those children who may be in need of safeguarding support.

Wendover Online School has the role of recognising and responding to potential indicators of abuse and neglect. All other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies are therefore regarded as essential by the school.

In the event of an actual or suspected case of child abuse by adults, parents, teachers, or any other adult, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as soon as possible. The Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified and the appropriate agency is involved.

The Designated Safeguarding Lead (DSL) or Designated Safeguarding Officer (DSO) will attend any reviews called by the Local Authority and may call on appropriate members of staff for reports. It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed for investigation. Staff should not assume that somebody else will take action and must share information which might be critical in keeping children safe. Staff leading school off-site visits, particularly residential ones, should provide a list of the students taking part to the Designated Safeguarding Lead (DSL), to ensure that they are made aware of all essential information relating to the students in their care. A confidential register will be maintained of all those students known to be at risk. Names will be entered on the register if it is confirmed by the Local Authority that the child is actually at risk.

### **Guidance for all staff on dealing with disclosure / suspected abuse / neglect / sexual harassment, sexual assault, violence, honour-based abuse (forced marriage and female genital mutilation), children who are at risk from or involved with violent crime and child-on-child abuse**

#### 1. Dealing with disclosures of abuse

- Always listen carefully and quietly. Do not press for any evidence at all.
- Remain calm and reassuring. Do not dismiss the disclosure and do not show distress or concern.
- Do not refute the allegation.
- Show that you care through open and reassuring facial expressions and body language.
- Do not interrogate or ask leading questions (it could later undermine a case).
- Ensure you take a written verbatim account of the child's disclosure.
- Staff should be aware that written accounts could become part of a statutory assessment or criminal investigation.

- Where there is an online element, the key consideration is for staff not to view or forward illegal images of a child. Where viewing images is unavoidable, the following link provides advice on how to respond:  
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
2. At this point, staff should take the following steps:
- Explain to the student that the disclosure must be reported – emphasise your trust in them.
  - Do not promise to keep the allegation secret or that ‘everything will be alright.’
  - Reassure the student by telling them that they have done the right thing in telling you.
  - Do not offer physical reassurance.
  - Do not admonish in any way e.g. ‘I wish you had told me sooner.’
  - Inform the DSL initially verbally.
  - Under no circumstances discuss the matter with any other person. If the allegations prove to be untrue, any such discussion would be deemed defamatory. Information to staff is on a ‘need to know’ basis at the discretion of the DSL.
  - If the child agrees, and it is appropriate, take them with you to the DSL.
  - With the DSL, prepare a detailed report itemising:
    - a) The information revealed by the student. It should not contain any opinion whatsoever.
    - b) Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within the school.
    - c) Date and sign any written record of events and action taken and keep confidential and secure.
  - You must keep, in absolute confidence, a copy of the report, as will the DSL.
  - The DSL keeps child protection records centrally and securely and are not kept in the child’s file.
  - All staff are under a duty to report all suspicions of abuse to the DSL.
  - The DSL is responsible for passing on these concerns to Children’s Services.
  - Accurate records are essential in the event of further investigations.
3. If you see or hear something that is concerning:
- Don’t ignore it or assume that it is someone else’s responsibility to report it.
  - Upload all information to the school’s safeguarding systems using the safeguarding forms and seek advice immediately from your DSL.
  - Don’t feel silly – if it worries you, someone else needs to know.
  - If it is something related to safeguarding, but not a child whose safety is immediately at risk, inform the appropriate Pastoral Leader or safeguarding officer in person and follow up with a one-line email notifying the DSL that there is a safeguarding concern.
  - If it is related to a child being at risk, see the DSL or Deputy DSL immediately and definitely before the child goes home that day where possible.
  - All staff may raise concerns directly with Children’s Services if they feel an incident is not being dealt with appropriately or they are unable to locate relevant staff.
  - Concerns about adults in the school should be made directly to the Principal.

### **Child Protection Procedures – Points of action**

If anyone discovers or suspects child abuse/child-on-child sexual violence or sexual harassment, they must inform the DSL. The DSL will, in the appropriate manner and according to procedures, assess the situation.

The DSL will, if appropriate, take the following steps:

- Where there is a report of child-on-child sexual violence, the DSL will make an immediate risk and needs assessment in accordance with part five of [Keeping Children Safe in Education 2023](#) (guidance for this can be found in Appendix 4). Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.
- Where it is clear that a Child Protection Referral (significant harm) is needed, they will contact Social Services without delay.
- Where the DSL is not sure whether it is a Child Protection issue, or where the DSL needs to check the Child Protection register, they may seek advice from the MASH (Multi Agency Safeguarding Board).
- They will follow locally agreed protocols which can be found on the Local Authority Safeguarding Partners formerly and in some cases still the LASC Board website.

The DSL or a delegated child protection officer will attend a Child Protection Conference. We recognise the importance of multi-agency working and will ensure that staff are able to attend all relevant meetings, case conferences, core groups, and strategy meetings. We will provide relevant training and support for staff required to attend any meetings.

## **Appendix 2: Information on child abuse and categories of abuse**

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

### **1. Abuse**

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children (child-on-child abuse). In a situation where abuse is alleged to have been carried out by another peer, the child protection procedures outlined in this policy should be adhered to for both the victim and the alleged abuser. That is, it should be considered a child care and protection issue for both children.

All abusers must be held accountable for their behaviour and work must be done to ensure that abusers take responsibility for their behaviour and acknowledge that the behaviour is unacceptable. If there is any conflict of interest between the welfare of the alleged abuser and the victim, the victim's welfare is of paramount importance.

Abusive behaviour that is perpetrated by peers must be taken seriously. It is known that some adult abusers begin abusing during childhood and adolescence, that significant numbers will have suffered abuse themselves, and that the abuse is likely to become progressively more serious. Early referral and intervention are therefore essential in line with paragraph 2 of this policy.

### **2. Child-on-child abuse**

Child-on-child abuse can manifest itself in many ways. All staff should be aware that children can abuse other children (referred to as child-on-child to account for age differences between children. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- 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.
- Sexting (also known as youth produced sexual imagery).
- Initiation/hazing type violence and rituals.

Please refer to the Department for Education advice:

<https://www.keepingchildrensafeineducation.co.uk/part-five-ch-sex-viol.html>

The Child Exploitation Online Protection Centre (CEOP) also provides further guidance on sexting at <https://www.ceop.police.uk/safety-centre/>

### **3. Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and persistent adverse effects on the child's development. It may involve conveying to children 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 opportunity 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 the child's developmental capability, as well as overprotection and limitation of exploring or 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 to frequently feel frightened or in danger, exploitation, or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

#### **4. Sexual abuse**

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 include 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**

Neglect is the persistent failure to meet a child's basic or physical and/or psychological needs, which is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. All staff and volunteers should be concerned about a child if he/she presents indicators of possible significant harm. Training will be provided to all staff on the 'signs of abuse.'

#### **6. Signs of Abuse in Children**

The following non-specific, broad signs may indicate something is wrong:

- Significant change in behaviour.
- Extreme anger or sadness.
- Aggressive and attention-seeking behaviour.
- Suspicious bruises with unsatisfactory explanations.
- Lack of self-esteem.
- Self-injury.
- Depression.
- Inappropriate sexual behaviour.
- Child Sexual Exploitation.

#### **7. Risk Indicators**



The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but they:

- Must be regarded as indicators of the possibility of significant harm.
- Justify the need for careful assessment and discussion with the Designated Safeguarding Lead.
- May require consultation with and/or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred. In an abusive relationship the child may:

- Appear frightened of the parent/carers.
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child, frequently complain about/to the child, and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misusing substances.
- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

## **8. Recognising Physical Abuse**

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parents/carers are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments.
- Reluctance to give information or mention previous injuries.

## **9. Bruising**

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Two simultaneous bruised eyes (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used e.g. belt marks, handprints, or a hairbrush.
- Bruising or tears around, or behind, the earlobe(s) indicating injury by pulling or twisting.
- Bruising around the face.
- Bruising on the arms, buttocks, and thighs may be an indicator of sexual abuse.

## **10. Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

### **11. Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine).
- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

### **12. Fractures**

Fractures may cause pain, swelling, and discolouration over a bone or joint. There are grounds for concern if:

- The history provided is vague, non-existent, or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain, or loss of movement.

### **13. Scars**

A large number of scars, scars of different sizes or ages, and scars on different parts of the body may suggest abuse.

### **14. Recognising Emotional Abuse**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also suggest the presence of other kinds of abuse. The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate, or not appropriate attachment.
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Scapegoating within the family, such as a parent blaming the child for something bad that happened to them (e.g. losing a job).
- Frozen watchfulness.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a “loner” – difficulty relating to others.
- The indicators of emotional abuse are often also associated with other forms of abuse.

### **15. Recognising Signs of Sexual Abuse**

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and a full account should be taken of the cultural sensitivities of any individual child/family. Recognition can be

difficult unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play, or conversation, inappropriate to the child's age.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including eating disorder), self-mutilation, and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area.
- Blood on underclothes.
- Pregnancy in a younger girl where the identity of the father is not disclosed.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen, and thighs, and sexually transmitted disease.

## **16. Sexual Abuse by Young People**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance, and exploitation.

This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality, and sexual abuse against adults, peers, or children. This may also include online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- Non-consensual sharing of sexual images and videos.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation
- Coercion and threats.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate sexual behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, or aggression together with secrecy, or where one participant relies on an unequal power base.

### **17. Assessment**

In order to more fully determine the nature of an incident and the presence of exploitation, the following factors should be given consideration:

- Equality – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies.
- Consent – consider whether an incident appeared consensual or non-consensual, keeping in mind that consent means willing agreement.

This requires consideration of all the following:

- Understanding that is based on age, maturity, development level, functioning, and experience.
- Knowledge of society's standards for what is being proposed – awareness of potential consequences and alternatives.
- Assumption that agreements or disagreements will be respected equally.
- Voluntary decision.
- Mental competence.
- Coercion – a young perpetrator who abuses may use techniques like bribing, manipulation, and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality, or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

### **18. Recognising Neglect**

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene, and medical care.
- A child seen to be listless, apathetic, and unresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child thrives away from home environment.
- Child frequently absent from school.
- Child left with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods.

### **Appendix 3: The School's Statutory Duty and Guidance Documents**

This policy sets out how Wendover Online School will meet its statutory duty to safeguard and promote the welfare of our students. It has been developed in accordance with the law and guidance found at <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2> that seeks to protect children.

Further guidance in relation to the safeguarding topics covered in this policy include:

- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges
- Working Together to Safeguard Children
- Multi-agency Statutory Guidance on Female Genital Mutilation
- Teaching Online Safety in Schools
- Information about mandatory reporting of female genital mutilation
- Protecting Children from Radicalisation: the Prevent duty
- Prevent Duty Guidance: England and Wales
- Inspecting safeguarding in maintained schools and academies
- Inspecting safeguarding in safeguarding in early years, education and skills settings
- Competence Still Matters: Safeguarding training for all employees and volunteers
- Preventing Youth Violence and Gang Involvement
- Safeguarding in Schools: Best Practice
- Criminal exploitation of children and vulnerable adults: county lines
- Sexual Offences Act
- The Children Act 1989 and 2004 and The Education Act 2002
- Mental Health and Behaviour in Schools: Departmental Advice
- Multi-agency statutory guidance on female genital mutilation
- Sexting in Schools, Aug 2016, UK Council for Internet Safety
- Learning together to be safe - a toolkit to help schools contribute to the prevention of violent extremism
- The Prevent Strategy: A Guide for Local Partners in England

If anyone wishes to seek further information or guidance, they can refer to the above documents. Please ensure you are reading the current iteration of a document.

#### **Appendix 4: Keeping Children Safe in Education 2023**

Please refer directly to Part five: Child-on-child sexual violence and sexual harassment of [Keeping Children Safe in Education 2023](#).

This part of the statutory guidance is about how schools and colleges should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and/or online. All staff working with children are advised to maintain an attitude of 'it could happen here', and this is especially important when considering child-on-child abuse.

## **Appendix 5: Child Protection and Safeguarding Contacts for students residing outside the UK**

The DSL and Principal of the school must be informed of issues which may have arisen, the usual school reporting procedures of completing an incident form must be carried out, all information must be a true representation of what is disclosed by the student without any inference. Staff must not promise to keep any information 'secret' and need to inform the student that they need to share the facts. Staff must follow all the UK recommended procedures relative to the range of abuse as indicated in the Wendover Online School Safeguarding and Child Protection Policy.

We recognise that it is vital that all members of staff at Wendover recognise how important it is to act swiftly, particularly when students are based outside the UK. In this case contact the British Embassy / Consulate Division and / or a reputable international school in the area in the relevant country for the relevant safeguarding contact details.

Where a teacher is based outside the UK and safeguarding and / or child protection issues are identified in their practice the same contacts should be referenced as well as the teaching council / authority based in their country of domicile.

## Appendix 6: Safeguarding form

This form is available as a:

- MS Form in the Staff Room Team.
- MS Word document that can be downloaded from the website or sent out by the Admin team.

<b>Safeguarding Form</b>	
Student's Name	
Lesson	
Date	
Name of Person Reporting	
Details of incident (facts only)	
Any actions that you have taken	



## Appendix 7: Safeguarding log

Incident number	Date	Student's Name	Year Group	Where has the concern been raised? e.g. Safeguarding form / conversation?	Name of person reporting and relationship to student	Incident / Concern summary	Action taken (including reasons for decisions) and Outcomes*  (NB – this section is only to be completed by DSL / DDSL)	Date Action taken	Follow up Action and Notes	Date of follow up meeting	Follow up Action by DSL / DDSL, if no follow-up required go to column M for Final Action	Final Action (Case closed / moved to low level concern / Signed off by DSL and DDSL (initials required) )Date

