Child Protection and Safeguarding Policy and Procedures

Heath Mount School, Hertfordshire

Independent Day and Boarding School for Boys and Girls

November 2020

Contents

Appendix

Definitions

CAF	Common Assessment Framework: a process undertaken by practitioners who work with children, young people, parents and carers. It is used to identify needs, and to organise the right support and services to address those needs at an early stage.
CPSLO	Child Protection School Liaison Officer.
CSE	Child Sexual Exploitation.
Designated Officers	the Local Authority team (Hertfordshire) who: provide advice and guidance on how to deal with allegations against people who work with children; liaise with the Police and other agencies and monitor the progress of cases, ensuring they are dealt with as quickly, consistently and fairly as possible.
DBS	Disclosure and Barring Service.
DSL	Designated Safeguarding Lead. References to the DSL include the Deputy Designated Safeguarding Lead(s) where the DSL is unavailable.
DDSLs	Deputy Designated Safeguarding Lead. The school has eleven.
EYFS	Early Years Foundation Stage.
FGM	Female Genital Mutilation.
GDPR	General Data Protection Regulations
HSCP	Hertfordshire Safeguarding Children Partnership.
KCSIE	Keeping Children Safe in Education (September 2019) (Statutory Guidance).
LADO	Local Authority Designated Officer
Looked After Children	A Looked After Child (sometimes referred to as 'LAC') is a child accommodated by the local authority, a child who is the subject of an Interim Care Order, full Care Order or Emergency Protection Order, or a child who is remanded by a court into local authority accommodation or Youth Detention Accommodation. Additionally, where a child is placed for Adoption or the local authority is authorised to place a child for adoption, the child is a Looked After Child.
SMT	Senior Management Team
Staff	All those who work on behalf of the School, regardless of their employment status, including contractors, supply and agency staff, volunteers and Governors unless otherwise indicated.
The School	Heath Mount School Trust Limited
TRA	Teaching Regulatory Authority

Heath Mount School

Key School Contacts

Designated Safeguarding and Prevent Lead Jonny Spowart (Deputy Head Pastoral)	Email: spowartjo@heathmount.org Telephone number: 01920 830 230, ext. 275 Mobile number: 07957 265376
Deputy Designated Safeguarding Lead (Pre-Prep, including EYFS) Anna Taylor (Head of Pre-Prep)	Email: tayloran@heathmount.org Telephone: 01920 830 230, ext. 112 Mobile number: 07876 408318
Deputy Designated Safeguarding Lead Rebecca Thornton (Head of Wellbeing)	Email: thorntonre@heathmount.org Mobile number: 07894 858156
Deputy Designated Safeguarding Lead Victoria Steward (School Counsellor)	Email: stewardvi@heathmount.org Mobile number: 07947 506215
Head Chris Gillam	Email: gillamc@heathmount.org Telephone number: 01920 830 230 Mobile number: 07717 415371
Chair of Governors Juliette Hodson	Email: juleshodson@gmail.com Mobile number: 07967 030929
Nominated Safeguarding Governor and Nominated Prevent Governor Richard Dent	Email: richard.dent@zen.co.uk Mobile number: 07768 657109
Independent Listener Rev. Christopher Briggs	Email: cbriggs@shiplake.org.uk Telephone number: 0118 940 2455

Key External Contacts

Designated Officer(s) of the Local Authority:

- **Tony Purvis**
- **Andrea Garcia- Sangil**
- **Yvette Morello**

Telephone number:

01992 555420 (work on a duty system and can be contacted by the support office)

Hertfordshire Children's Social Care department

Hertfordshire County Council, Children's Services: Safeguarding and Specialist Services	0300 123 4043
Consultation Hub Schools and colleges can ring the Consultation Hub (for concerns that are not of immediate risk of harm),	01438 737511
Local Authority out of hours contact number	0300 123 4043
Kassiane Papageorgiou Team Manager: LADO & CPSLO Quality Assurance, Improvement and Practice	01992 588168 Kassiane.Papageorgiou@hertfordshire.gov.uk

The local police non-emergency contact number for FGM reporting is 101.

Contact details for the relevant Prevent partners are as follows:

Channel Police Practitioner	101. Ask for the 'Prevent' team. Referrals can be made to the Prevent team at: prevent@herts.pnn.police.uk
Hertfordshire (Eastern Region) Prevent Lead	DCI Matt Thompson
Channel Local Authority Chair	Guy Pratt
Non-emergency DfE advice	020 7340 7264 counter-extremism@education.gsi.gov.uk

The National Society for the Prevention of Cruelty to Children (**NSPCC**) whistleblowing helpline can be contacted on:

NSPCC
Weston House
42 Curtain Road
London
EC2A 3NH

Telephone: 0800 028 0285
Email: help@nspcc.org.uk

1   Policy statement

1.1   Every pupil should feel safe and protected from any form of abuse and neglect. Please see Appendix 2 for explanations of the types and possible signs of abuse. Some pupils may be in need of additional support even though they may not be at risk of harm. Heath Mount School ('the School') takes the mental and emotional wellbeing of its pupils seriously. All concerns outside Child Protection are dealt with through our pastoral system and should be raised with the pupil's form teacher in the first instance. It may be necessary for the School to complete a 'Common Assessment Framework' (CAF) form for a Child in Need in order to access local services. The School is committed to safeguarding and promoting the welfare of children and young people and requires everyone who comes into contact with children and their families to share this commitment and familiarise themselves with and comply at all times with this policy. The School has a duty to consider at all times the best interests of the pupil.

1.2   Keeping Children Safe in Education (2020) (**KCSIE**) defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

2   Regulatory Framework

2.1   In order to safeguard and promote the welfare of children, this policy has been prepared to meet the School's responsibilities under:

       2.1.1   Education (Independent School Standards) Regulations 2014;

       2.1.2   Statutory Framework for the Early Years Foundation Stage (DfE, 2020);

       2.1.3   Education and Skills Act 2008

       2.1.4   The Children Act 1989;

       2.1.5   The Children Act 2004;

       2.1.6   The Education Act 2002;

       2.1.7   The Sexual Offences Act 2003;

       2.1.8   Children Act 2006;

       2.1.9   Data Protection Act 2018 and General Data Protection Regulation (GDPR);

       2.1.10 Equality Act 2010;

       2.1.11 Charities Act 2011;

2.2 This policy further has regard to the following guidance and advice:

2.2.1 Keeping Children Safe in Education (2020) (KCSIE);

2.2.2 Working together to safeguard children (WTSC DfE, 2019);

2.2.3 Disqualification under the Childcare Act 2006 (DfE 2018);

2.2.4 Prevent duty guidance for England and Wales (HM Government 2019);

2.2.5 Channel Duty Guidance: protecting vulnerable people from being drawn into terrorism (HM Government 2019);

2.2.6 Multi-agency statutory guidance on FGM (HM Government 2020);

2.2.7 What to do if you're worried a child is being abused: advice for practitioners (HM Government 2015);

2.2.8 Information sharing: advice for practitioners providing safeguarding services (HM Government 2018);

2.2.9 Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS) (2016));

2.2.10 The Education (Pupil Information) (England) Regulations 2005

2.2.11 Children Missing Education (DfE, 2016);

2.2.12 Child Sexual Exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from exploitation (DfE, 2017);

2.2.13 Sexual violence and sexual harassment between children in schools and colleges (DfE, 2018);

2.2.14 Searching, screening and confiscation: advice for schools (DfE, 2018);

2.2.15 Listening to and involving children and young people (DfE, January 2014);

2.2.16 Safeguarding children (government guidance and resources)

2.2.17 Strategy for dealing with safeguarding issues in charities (Charity Commission, 2017);

2.2.18 Regulatory alert to charities – safeguarding (Charity Commission, 2017);

2.2.19 How to respond to a serious incident in your charity (Charity Commission, updated 2019);

2.2.20 Relationships education, relationships and sex education and health education guidance (DfE July 2019);

2.3 The School is committed to safeguarding and promoting the welfare of each pupil in its care and expects everyone who works at the School to share this commitment. The School will:

2.3.1 follow the local inter-agency procedures of the Hertfordshire Safeguarding Children Board ('HSCP');

2.3.2 ensure that we practice safer recruitment in checking that suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children and young people;

2.3.3 maintain a Single Central Register (SCR) of appointments for all staff and a separate section within the SCR for all volunteers;

2.3.4 ensure that all teaching and support staff (collectively known as 'staff') who regularly come into contact with pupils receive child protection training, carried out by the Designated Safeguarding Lead ('DSL') or other appropriately qualified staff, on induction and regularly thereafter (see paragraph 8.7);

2.3.5 be alert to signs of abuse or possible abuse both in the School and outside and protect each pupil from any form of abuse, whether from an adult or another pupil;

2.3.6 deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with his / her agreed child protection plan;

2.3.7 design and operate procedures which promote this policy and which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;

2.3.8 be alert to the needs of children with physical and mental health conditions;

2.3.9 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

2.3.10 assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

2.3.11 identify children who may be vulnerable to radicalisation, and know what to do when they are identified; and

2.3.12 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in the local area.

3   **Application and accessibility**

   3.1   This Policy has been authorised by the Governors and is addressed to all members of staff and volunteers. It is a whole-school policy including the Early Years Foundation Stage (**EYFS**) provision and applies wherever staff, Governors and volunteers are working with pupils even where this is away from the School, for example an educational visit.

   3.2   This Policy is published on the School website and is available in hard copy on request. It can be made available in large print or other accessible format if required.

   3.3   This policy and all of the policies referred to in it are available to staff in the policies folder on the staff drive and on the staff room noticeboards in each section of the School.

4   **Related policies**

   4.1   The following policies, procedures and resource materials are also relevant to the School's safeguarding practices:

      4.1.1   staff code of conduct;

      4.1.2   staff acceptable use of ICT policy;

      4.1.3   staff social media policy;

      4.1.4   whistleblowing policy;

      4.1.5   safer recruitment policy;

      4.1.6   online safety policy;

      4.1.7   anti-bullying policy;

      4.1.8   safe and acceptable use of ICT policy for pupils;

      4.1.9   visitors and security policy;

      4.1.10 risk assessment policy for pupil welfare;

      4.1.11 missing pupil policy;

      4.1.12 learning support policy;

      4.1.13 equal opportunities policy;

      4.1.14 first aid policy);

      4.1.15 Standard Operating Procedures for the Medical Centre;

      4.1.16 behaviour and discipline policy;

      4.1.17 Relationships, Education and Relationships Sex Education policy;

4.1.18 procedures and updates for the governance of school safeguarding.

5   **Prevent policy**

5.1   The School will also follow guidance in relation to the specific safeguarding issues outlined in Appendix 2. This includes the Prevent Duty Guidance 2015, in the exercise of its functions, to have due regard to the need to prevent people from being drawn into terrorism.

6   **Designated Safeguarding Lead**

6.1   The School's Governing Body has appointed a Designated Safeguarding Lead (**DSL**). The DSL is a member of the School's Senior Management Team (SMT) with the necessary status and authority to take lead responsibility for safeguarding and child protection (including online safety).

6.2   The DSL shall be given the time, funding, training, resources and support to enable him / her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings - and / or to support other staff to do so - and to contribute to the assessment of children.

6.3   The name and contact details of the DSL are set out in the School contacts list at the front of this Policy. The main responsibilities of the DSL are set out in Appendix 1.

6.4   The DSL takes lead responsibility for all aspects of safeguarding throughout the School. The DSL will meet with the Nominated Safeguarding Governor at least on a termly basis. (See also section 7.5).

6.5   If the DSL is unavailable, the activities of the DSL will be carried out by a nominated DDSL, being one of the three Deputy Designated Safeguarding Leads, ('DDSLs') as appropriate. The DDSL's details are also set out in the School contacts list at the front of this Policy. In this Policy, reference to the DSL includes the DDSL where the DSL is unavailable.

6.6   The DSL and DDSLs for the Pre-Prep and Prep School may be contacted on their mobile telephones in relation to any safeguarding concerns out of school hours.

6.7   The DSL and the DDSLs have written job descriptions outlining the responsibilities and activities connected to their roles.

7   **Duty of staff, Governors and volunteers**

7.1   All staff, Governors and volunteers of the School are under a general legal duty to:

7.1.1   protect children from abuse;

7.1.2   be aware of the terms and procedures in this Policy and to follow them;

7.1.3 know how to access and implement the procedures in this Policy, independently if necessary;

7.1.4 keep a sufficient record of any concerns, discussions and decisions in accordance with this Policy; and

7.1.5 report any matters of concern in accordance with this Policy as soon as possible without investigating further.

7.2 Staff connected to the School's Early Years and Later Years provisions are under an on-going duty to inform the School if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Safer Recruitment Policy for further information about this duty and to their contract of employment in respect of their on-going duty to update the School.

7.3 The Governing Body:

7.3.1 ensures there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;

7.3.2 reviews the procedures for and the efficiency with which the child protection duties have been discharged;

7.3.3 ensures the School's safeguarding arrangements take into account the procedures and practice of the HSCP, including understanding and reflecting local protocols for assessment and the referral threshold document; and

7.3.4 ensures the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified and support to children subject to child protection plans.

7.3.5 approves amendments to child protection arrangements in the light of changing regulations or recommended best practice.

7.4 The Head will ensure that the policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.

7.5 The Governing Body has nominated one of its members to take leadership responsibility for the School's safeguarding arrangements. The Nominated Safeguarding Governor's contact details are set out in the School contacts list at page 4 of this policy. The Nominated Safeguarding Governor visits the DSL at least on a termly basis. The Safeguarding Governor's role includes oversight and discussion in the following areas:

7.5.1 the safeguarding audit and annual safeguarding checklist;

7.5.2 referrals to children's services (anonymised) in respect of the promotion of welfare and any themes emerging for future action;

7.5.3 any referrals to the DO in respect of staff/volunteers and actions taken;

7.5.4 any specific themes or issues emerging in the School such as FGM, e-safety, radicalisation racism/gender. This includes any steps taken with regard to these themes or issues;

7.5.5 logs of bullying, e-safety, behaviour and restraint to check any trends/links to child protection matters;

7.5.6 any connection between any complaints/concerns and any safeguarding & welfare matters;

7.5.7 any trends regarding complaints/concerns of a child protection or safeguarding nature.

7.6 During visits the Safeguarding Governor may also:

7.6.1 talk to members of staff to ensure they are aware of child protection procedures;

7.6.2 look at staff files to check attendance at child protection training;

7.6.3 audit files on the SCR (and give feedback to the Head and to the Governors, if there are any issues);

7.6.4 meet with the Compliance Officer;

7.7 The Safeguarding Governor uses a checklist to assist with covering as many of the above points as practicable during his discussions and visits. The outcome of the matters covered in each visit will be reported at the termly Governors' Education Committee meeting. This will supplement the reports from the DSL.

8 **Training**

8.1 The School provides regular guidance and training, both during induction and at regular intervals thereafter to ensure that staff understand what is expected of them by this policy.

8.2 The level and frequency of training will depend on the level and role of individual members of staff.

8.3 Any contractors working regularly in the School are provided with the School's safeguarding leaflet outlining: The Code of Conduct for visitors, their duty to pass on any concerns and the contact details of the DSL.

8.4 All training will be carried out in accordance with HSCP procedures and or guidance where possible.

8.5 The School maintains electronic records of all staff training.

8.6 **Induction:** The induction training for temporary staff and volunteers includes the provision of KCSIE 2020 Part 1 (including Annex A), this policy, the School's safeguarding contacts card and an induction meeting with the DSL. All other staff are provided with induction training that includes;

8.6.1 this Policy;

8.6.2 The identity, role and contact details of the DSL and DDSLs;

8.6.3 The School's approach to online safety;

8.6.4 The School's Behaviour and Discipline Policy for pupils;

8.6.5 the staff code of conduct including the whistleblowing policy, staff social media policy and the staff acceptable use of technology policy;

8.6.6 the safeguarding response to children who go missing from education;

8.6.7 child protection training in accordance with HSCP procedures;

8.6.8 a copy of Part 1 (including Annex A of KCSIE 2020); and

8.6.9 appropriate Prevent training.

8.7 **Child protection training**

8.7.1 All staff, including the Head, will receive a copy of this Policy and Part 1 (including Annex A) of KCSIE. They will be required to confirm that they have read and understand these. Each time Part 1 of KCSIE is updated by the Department for Education, staff will be updated via a combination of email updates, online and face-to-face / Inset training.

8.7.2 All staff should understand key information in Part 1 (including Annex A) of KCSIE 2020). The School will ensure understanding via discussion and also completion of online courses which include assessments of understanding.

8.7.3 The Head and all staff members will undertake appropriate child protection training which will be updated every 3 years and following consultation with the HSCP. Current HSCP advice is for training to take place every 3 years. In addition, all staff members will receive safeguarding and child protection updates via email, e-bulletins and staff meetings on a regular basis and at least annually.

8.7.4 Staff development training will include training on online safety and harmful sexual behaviours (including peer-on-peer sexual violence and harassment) and how to manage a report of peer-on-peer sexual violence and / or sexual harassment. Staff development training also

includes Prevent awareness training assessed as appropriate for them by the School. This is to equip staff to raise concerns appropriately by ensuring they have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas and know how to refer children for further help.

8.7.5 Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, Female Genital Mutilation (FGM), cyber bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

8.7.6 The Safeguarding Governor and the Chair of Governors will receive appropriate training to enable them to fulfil their safeguarding responsibilities.

8.7.7 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant skills and knowledge to safeguard children effectively, including email updates, online training programmes, staff meetings and professional development reviews.

8.8 **Designated Safeguarding Lead**

8.8.1 The DSL and DDSLs will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness, SEND and online safety training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL and DDSLs, see Appendix 1.

8.8.2 Prevent duty training will be consistent with Home Office Workshop to Raise Awareness of Prevent (WRAP) training or equivalent or as advised by HSCP.

8.9 **Teaching pupils about safeguarding**

8.9.1 The School teaches pupils about safeguarding through the curriculum and extra-curricular programme, PSHEE and RSE, assemblies, including guidance on adjusting behaviour to reduce risks, particularly online and fostering healthy relationships with others.

8.9.2 Pupils are introduced to wellbeing, emotional, physical and mental health in order to develop resilience and self-esteem in an age appropriate manner. Resilience is particularly important in safeguarding to mitigate the risk of being drawn into extremism.

8.9.3 Parents are offered advice via the School newsletters and are invited to talks on subjects such as 'Internet Safety'.

8.9.4 The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. This includes teaching pupils about the safe use of electronic equipment and the internet and the risk posed by adults or young people, who use the internet to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School has appropriate filters and monitoring systems in place (see the School's Online Safety Policy) and is mindful that this should not lead to unnecessary restrictions on learning.

9 Reporting obligations of staff in relation to safeguarding

9.1 All staff have a duty to:

9.1.1 report any concerns they may have about the safety and / or wellbeing of pupils;

9.1.2 report any concerns they may have about the safety and / or wellbeing of pupils or other persons associated with the School;

9.1.3 report any concerns about staff or anyone else associated with the School; and

9.1.4 follow up on any such reports about staff to ensure appropriate action has been taken.

10 Procedures if staff are concerned about a child

10.1 The child protection training provided to staff considers the types and signs of abuse and neglect staff must be aware of. The types of abuse and neglect and examples of specific safeguarding issues are set out in Appendix 2.

10.2 Staff should refer to the guidance in Appendix 3 in the event of receiving a disclosure from a child and for guidance about recording concerns.

10.3 Staff members working with children should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.

10.4 If staff are ever unsure, they must always speak to the DSL or one of the DDSLs if the DSL is unavailable, or directly to Children's Social Care or the Police in their absence for guidance.

10.5 There is no statutory definition of a concern, therefore, staff should interpret 'concern' broadly. It could be that a concern relates to the view that a child would benefit from extra support, an emerging problem or an unmet need. It may reflect a concern about a child's welfare and that a child may be

deemed to be 'in need' or at 'immediate risk of harm' as defined by the Children Act 1989.

10.6   If a concern involves an allegation against a member of staff, this must be recorded in accordance with the procedures at appendix 4.

11   Internal Support for Pupils

11.1   The School has a framework which provides for the identification, assessment, management and review of the risk to pupil welfare so that appropriate action can be taken to reduce identified risks (see: The School's Risk Assessment for Pupil Welfare Policy).

11.2   Form tutors provide support throughout the School during one to one conversations with pupils and during form time. They work with members of staff and parents to implement strategies and support plans as necessary.

11.3   Additional support is provided by the following pastoral staff: The Deputy Head (Pastoral); the Head of EYFS); the Head of Pre-Prep; the Heads of the Lower, Middle and Upper Schools; the Head of Wellbeing; the School Counsellor, the School medical team, the boarding house parents and the School's Independent Listener. This pastoral team are available to provide support to pupils with issues they may have.

11.4   Children are regularly reminded that they can speak to any of those listed above or any trusted adult. Help and advice lists are displayed in each part of the School identifying who children can speak to as outlined above. These lists also include the contact details for Childline and the School's Independent listener. The lists are also included in the Children's planners (Years 3-8). In the boarding Houses, the list also includes the contact details for the Office of the Children's Commissioner.

11.5   Specific concerns are discussed at various staff meetings so that staff are aware of how to support a pupil, whether that be in the classroom, playground, specialist lessons, lunch etc.

12   What if the DSL is unavailable?

12.1   The DSL or the DDSL should always be available during school hours or when a school activity is taking place in order to discuss safeguarding concerns and may be contacted via the number given in the Key School Contacts section of this policy at page 4.

12.2   Staff availability cannot be guaranteed out of school hours or when a school activity is not taking place. At such times, urgent safeguarding matters should be referred direct to Children's Social Care with a copy to the DSL. During these times, non-urgent matters may be emailed to the DSL.

12.3   The School has three DDSLs to cover all areas of the School. It is therefore unlikely that a member of staff will be unable to reach either the DSL or one of the DDSLs. If such a situation does arise, staff must not delay taking

action. Staff should speak to their line manager or a member of the SMT and / or advice should be sought from Children's Social Care.

12.4 Where a child is suffering harm, or is likely to be suffering harm, a referral to Children's Social Care should be made immediately. Staff should be aware of the process for making referrals direct to Children's Social Care and / or the police in these circumstances. See paragraph 17 for how to make a referral.

12.5 Any action should be shared with the DSL or DDSL(s) as soon as possible.

13 **Early help**

13.1 The School understands that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

13.2 The School's safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:

13.2.1 is disabled and has specific additional needs;

13.2.2 has special education needs (whether or not they have a statutory Education, Health and Care Plan);

13.2.3 is a young carer;

13.2.4 is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups;

13.2.5 is frequently missing / goes missing from care or home;

13.2.6 is misusing drugs or alcohol themselves;

13.2.7 is at risk of modern slavery, trafficking or exploitation;

13.2.8 is in a family circumstance presenting challenges for the child such as substance abuse, adult mental health problems or domestic abuse;

13.2.9 is looked after or has returned home to their family from care;

13.2.10 is showing early signs of abuse and/ or neglect;

13.2.11 is at risk of being radicalised or exploited;

13.2.12 is a privately fostered child.

13.3   A member of staff or volunteer who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the HSCP referral threshold document and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

13.4   If early help is appropriate, the matter will be kept under review and consideration given to a referral to Children's Social Care if the pupil's situation does not appear to be improving.

14   Concerns about a pupil's welfare

14.1   If staff have **any concern** about a pupil's welfare, action should be taken immediately, including reporting to the DSL as soon as possible. See paragraph 18 and Appendix 4 for the procedures for dealing with allegations against staff and volunteers.

14.2   On being notified of a concern the DSL will consider the appropriate course of action in accordance with the HSCP referral threshold document. Such action may include:

14.2.1 supporting the pupil via the School's pastoral support processes, seeking advice from Children's Social Care when required;

14.2.2 an Early Help Assessment (see paragraph 13 above);

14.2.3 a referral to statutory services (see paragraph 18 below);

14.2.4 the views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

14.3   If it is decided that a referral is not required, the DSL will keep the matter under review and consideration will be given to a referral to Children's Social Care if the pupil's situation does not appear to be improving.

14.4   Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism or in instances of allegations against children (peer-on-peer abuse, see Appendix 2, paragraph 3.8).

14.5   In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL (or DDSL where appropriate) to agree a course of action where possible. However, any member of staff can make a referral to Children's Social Care. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

15   If a child is in immediate danger or at risk of harm

15.1   If a pupil is in **immediate** danger or is at risk of harm, a referral should be made to Children's Services; Safeguarding and Specialist Services (see page 6 for contact details) and / or the police immediately.

15.2 Anybody can make a referral in these circumstances. See paragraph 18 below for details on making a referral.

15.3 If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

16 Contextual safeguarding

16.1 Safeguarding incidents and / or behaviour which raises concern, can be associated with factors outside of school and / or can occur between children outside of school.

16.2 All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, including whether there are any issues present in a child's life that may be a threat to their safety and / or welfare.

16.3 Children's Social Care should be provided with all such information to enable any assessment process to take into account all available evidence and the context of any abuse.

17 Female Genital Mutilation (FGM)

17.1 Teachers must report to the police known cases of FGM in under 18s. See Appendix 2 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

18 Making a referral

18.1 **If a child is suffering, or is likely to suffer harm, a referral to Children's social care and / or the police immediately. The contact details for Children's Social Care are set out at page 5 of this policy.**

18.2 Staff will need to have access to certain information about the child and the nature of the safeguarding concern in order to make a referral. This will include:

18.2.1 personal details of the child;

18.2.2 detailed information regarding the concern;

18.2.3 family information, including any external factors which may impact the child's parents' or carers' capacity to parent.

18.3 If the referral is made by telephone, this should be followed up in writing. All reports of concern should be recorded and reported via a record of concern form (located in the staff rooms and the staff drive). The record of concern form should be completed in as much detail as possible, using the child's own words.

18.4 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the

referral) should contact Children's Social Care again. The flowchart at page 13 of KCSIE 2019 and the flowcharts set out at Chapter 1 of WTSC are helpful to illustrate the likely actions and decisions required.

18.5   If after a referral the pupil's situation does not appear to be improving, the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns are addressed and that the pupil's situation improves. The DSL may call the CPSLO Consultation Service for further advice (see page 6 for contact details).

18.6   Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.

18.7   Reporting allegations against pupils should be reported in the same way as outlined in paragraphs 18.1 – 18-6, above. For further information about peer-on-peer abuse, see Appendix 2, paragraph 3.8.

19   **Dealing with allegations against teachers, the Head, Governors, volunteers and other staff**

19.1   The School has procedures for dealing with allegations against staff, Governors and volunteers that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 4 and follow Part 4 of KCSIE.

19.2   The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

19.3   The local authority has a designated team of officers, involved in the management and oversight of allegations against people that work with children (DO's). The DO's will be informed immediately and in any event within one working day of all such allegations that come to the School's attention and appear to meet the criteria set out in paragraph 1 of Appendix 4.

19.4   Detailed guidance is given to staff, Governors and volunteers on the expectations of the School with regard to contact with pupils, parents, colleagues and any other person who comes into contact with the School. This is to ensure that the behaviour and actions of staff do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Handbook: staff code of conduct, which is available in the policies folder located in the Staff drive. It is also available in the staff rooms and is given to new staff during induction. It includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

19.5   Staff and volunteers should also feel able to follow the School's separate whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly safeguard the welfare of pupils and those concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see page 6 of this policy for the relevant contact details).

20   Missing Child Procedures

20.1   All staff are informed of and requested to familiarise themselves with the procedure to be used for searching for and if necessary, reporting, a pupil missing from School. The procedure includes the requirement to record any incident, the action taken and the reason given by the pupil for being missing. Please see the School's Missing Pupil Policy for further details.

21   Informing parents

21.1   Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the DO(s), Children's Services and / or the police before discussing details with parents. The School will manage the pupil(s) expectations about information sharing. The School will also keep them and their parents informed of developments where it is safe to do so. In all cases, the DSL will be guided by the HSCP referral threshold document.

21.2   In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent / guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

21.3   See also paragraph 3 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Head.

22   Additional Reporting

22.1   In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to other regulatory bodies or organisations, including but not limited to:

22.1.1 Health and Safety Executive

(a)   The School is legally required under RIDDOR to report all serious incidents to the Health and Safety Executive. Please see the school's health and safety policy and procedures.

22.1.2 Charity Commission

(a)   The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance 'how to report a serious incident in your charity (Charity Commission, September 2017).

(b)   Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils. This is likely to involve the following:

(i)   Pupils who have been, or are alleged to have been, abused or mistreated while under the care of the School or by someone connected with the School, for example, a Governor, staff member or volunteer;

(ii)   There has been an incident involving the abuse or mistreatment (alleged or actual) of someone and this is connected with the activities of the School;

(iii)   There has been a breach of the School's procedures or policies which has put pupils at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children.

(c)   The School will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy.

22.1.3 Disclosure and Barring Service (DBS)

(a)   A referral to the DBS will be made promptly if the criteria are met (see Appendix 4).

22.1.4 Teaching Regulation Agency

(a)   The School will consider whether a referral to the TRA should be made where a teacher has been dismissed, or would have been dismissed, if he / she had not resigned (see Appendix 4).

22.1.5 Insurers

(a)   The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers and, if so, the time-scale required by the relevant policies. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

(b)   In any event, care should be taken to ensure this is done before renewal so that the School complies with its duties

under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / policy and / or if it is unable to locate the relevant insurer and / or the extent of the report required, professional advice will be sought.

23   **Secure School Premises**

23.1   The School will take all practical steps to ensure that School premises are as secure as circumstances permit.

23.2   Visitors during normal hours are required to sign in at Reception (in the appropriate building) where they are issued with a visitor's badge which should be worn at all times whilst they are on school property. Visitors may be required to produce 'photo ID. Further details can be found in the Guidance on Security, Access, Control, Workplace Safety and Lone Working Policy and the Visiting Speaker's Policy, (available on request).

24   **Risky Areas**

24.1   All children are supervised when playing in the grounds, albeit this can be close or at a distance depending on the age of the pupils. There is a rota of staff to supervise outdoor play and there are areas of school buildings and grounds where children are either: not permitted unsupervised access or not permitted access to unlit areas during the hours of darkness. For further information about risky areas for pupils, including boarders, please refer to the Pupil Access to Risky Areas Policy.

25   **Boarding**

25.1   Children in residential settings can be more vulnerable to abuse and boarding staff should be alert to this and the potential for peer abuse. Our Boarding Houses have regard to the National Minimum Standards for Boarding Schools which include:

25.1.1 Briefing for senior pupils about what action to take should they receive an allegation of abuse or have a concern about any fellow boarder or member of staff;

25.1.2 A child protection briefing for prefects at their first meeting outlining the adults within and outside of school to whom they can turn, including details of how to contact the Independent Listener;

25.1.3 The Missing Pupil Policy and the procedures to be used when searching for a missing boarder;

25.1.4 The steps used to report concerns or allegations to the local authority team, or OFSTED via the whistle blowers' Hotline on 0300 123 3155 or via email at whistleblowing@ofsted.gov.uk

25.2   If an allegation of abuse is made against a member of boarding staff, the Head, DSL and the DO(s) will follow the steps outlined in Appendix 4 of this

Policy. Arrangements may be made for accommodation away from children until the investigation is complete and the results have been disclosed.

26 Safer Recruitment and Supervision of Staff

26.1 The School is committed to safer recruitment processes, including checking the suitability of staff employed by other organisations if they supervise the School's pupils on a site other than a school (see the School's Educational Visits Policy)Full details of the School's safer recruitment procedures for checking the suitability of staff is set out in the School's Recruitment, Selection and Disclosure Policy and Procedures.

26.2 The School maintains a Single Central Register of appointments for all staff.

26.3 Staff connected to the School's early years and later years provision are under an ongoing duty to inform the School if their circumstances change, meaning they would meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Recruitment, Selection and Disclosure Policy and Procedures for further information regarding this duty as well as their contract of employment in respect of their ongoing duty to update the School.

26.4 The School's protocols for ensuring that all visiting speakers are checked as suitable (whether invited by staff or pupils) and supervised is set out in the School's Visitors and Visiting Speakers Policy.

27 Use of mobile phones and cameras

27.1 The School's policy on the use of mobile phones and cameras in the School, including the EYFS setting, is as follows:

27.1.1 the School's safe and acceptable use of ICT for pupil's policy sets out the expectations on all pupils. In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises;

27.1.2 staff and volunteers should use mobile phones and cameras in accordance with the guidance set out in the staff code of conduct (staff acceptable use of ICT policy). Only school devices may be used to take photographs of pupils. Staff personal mobile phones should only be used in an emergency around pupils;

27.1.3 parents and family members may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

27.1.4 Visitors, including contractors, may bring mobile phones onto the premises but may not take photographs or videos under any circumstances. The only exception is where a commercial third party

is permitted to take photos or videos of pupils with the consent of a senior member of staff and with appropriate supervision.

28   **Record keeping**

28.1   All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

28.2   All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

28.3   Staff must record all concerns about a child on the School's pro forma record which is available in all staff rooms. Guidance on record keeping is set out in Appendix 3.

28.4   The DSL will open a child protection file following a report to him / her of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

28.5   The records created in accordance with this policy many contain personal data. The School has a Privacy Notice available via the School website which explains use of personal data for the benefit of pupils and parents. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's Data Protection and Information Security Policies.

29   **Information sharing and multi-agency work**

29.1   The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. When a child leaves the School, their Child Protection File (if one exists) is transferred securely to the new School.

29.2   The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety of pupils. The School understands that the GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

29.3   The School will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989.

29.4   Where allegations have been made against staff, the School will consult with the DO(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

29.5   The School will share information where it is appropriate to do so. However, they may be unable to do so, for example, because it would pose a risk of harm to others or because it has been prohibited by external agencies.

30   Monitoring and review

30.1   The DSL will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary and seeking contributions from staff. The DSL will update the SMT regularly on the operation of the School's safeguarding arrangements.

30.2   Any child protection incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Governing Body. Where an incident involves a member of staff, the DO(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses with regard to child protection arrangements at any time will be remedied without delay.

30.3   The full Governing Body will undertake an annual review of this Policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The DSL will work with the Nominated Safeguarding Governor, preparing a written report commissioned by the full Governing Body. The written report should address how the School ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.

30.4   The full Governing Body should also consider independent corroboration, such as inspection of records or feedback from external agencies including the DO(s). The full Governing Body will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval. Detailed minutes recording the review by the Governing Body will be made.

Ratified by the Full Board of Governors, 2nd December 2020

Date	2nd December 2020
Effective date of the policy	September 2020
Review date of the policy	September 2021

Appendix 1   Designated Safeguarding Lead (DSL)

1   The DSL is the first point of contact for parents, pupils, teaching staff, support staff, volunteers, external agencies and any other parties in all matters of child protection (except in the case of allegations against staff, volunteers or Governors, where the procedures in Appendix 4 should be followed). The DSL provides support, advice and expertise on all matters concerning safeguarding.

2   The contact details for the DSL for the School are set out at page 4.

3   The contact details for the DDSLs are set out at page 4.

4   **In accordance with Annex B of KCSIE, the main responsibilities of the DSL are:**

   4.1   **Managing referrals**

      4.1.1   The DSL is expected to:

         (a)   refer cases of suspected abuse to the local authority Children's Social Care as required;
         (b)   support staff who make referrals to the local authority Children's Social Care;
         (c)   refer cases to the Channel programme where there is a radicalisation concern as required;
         (d)   support staff who make referrals to the Channel programme;
         (e)   refer cases where a person is dismissed or has left due to risk / harm to a child to the DBS as required; and
         (f)   refer cases where a crime may have been committed to the Police as required.

   4.2   **Work with others**

      4.2.1   Act as a point of contact with the HSCP;

      4.2.2   Liaise with the Head to inform him of issues, especially on-going enquiries under section 47 of the Children Act 1989 and police investigations;

      4.2.3   As required, liaise with the Case Manager and the DO's at the local authority for child protection concerns (all cases which concern a staff member).

      4.2.4   Liaise with staff, in particular, those staff with a pastoral role, the Head of IT and the Head of Learning Support, on matters of safety and safeguarding (including online and digital safety) when deciding whether to make a referral by liaising with relevant agencies.

      4.2.5   Act as a source of support, advice and expertise for staff.

4.3 Raise awareness

4.3.1 Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and the Senior Management Team.

4.3.2 The DSL should ensure this Policy is known, understood and used appropriately.

4.3.3 Ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.

4.3.4 Ensure this Policy is available publicly.

4.3.5 Ensure that parents are aware that referrals about suspected abuse or neglect may be made to Children's Social Care and the School's role in this.

4.3.6 Maintain links with the HSCP to ensure staff are aware of training opportunities and the local policies on safeguarding arrangements.

4.4 Child protection file

4.4.1 Where children leave the School, ensure their child protection file is copied for any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.

4.4.2 Additionally, the DSL will consider if it is appropriate to share any information with the new school in advance of a child leaving.

4.4.3 Upon receipt of a child protection file, the DSL will ensure that key staff are aware as necessary, including the Head of Learning Support.

4.4.4 Child protection files will otherwise be retained and disposed of in accordance with the School's policies on data protection and the retention of records.

4.5 Prevent

4.5.1 In accordance with the Prevent Duty Guidance for England and Wales and Channel duty guidance: protecting vulnerable people from being drawn into terrorism (2019) the DSL has, in addition, the following responsibilities:

(a) acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;

(b) co-ordinating Prevent duty procedures in the School;

(c) liaising with local prevent co-ordinators, the police and local authorities and through existing multi-agency forums,

including referrals to the Channel Police Practitioner and / or the police where indicated;

(d) undergoing WRAP or other appropriate training;

(e) maintaining an on-going training programme for all school employees including induction training for all new employees and keeping records of staff training; and

(f) monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

4.6 **Training:**

4.6.1 The DSL and the DDSL(s) have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness, SEND and online safety training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

(a) understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;

(b) have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

(c) ensure each member of staff has access to and understands the School's Child Protection and Safeguarding Policy and procedures, especially new and part time staff;

(d) are alert to the specific needs of children in need, those with special educational needs and young carers;

(e) understand the relevant data protection requirements, in particular, the Data Protection Act 2018 and the GDPR;

(f) understands the importance of information sharing, both with the HSCP, other agencies, other agencies, organisations and professionals where necessary.

(g) are able to keep detailed, accurate, secure written records of concerns and referrals;

(h) understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

(i) obtain access to resources and attend any relevant or refresher training courses;

(j) understands the risk associated with online safety and are confident they have relevant, up-to-date knowledge to assist with keeping children safe whilst online at school.

(k) recognise the additional risks children with SEN and disabilities (SEND) face online, e.g.: from online bullying, grooming and radicalisation and are confident they are able to support SEND children to stay safe online.

(l) encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

(m) are able to take lead responsibility for pupils who are looked after children.

4.7 Looked after children

4.7.1 The DSL will take responsibility for pupils who are looked after.

4.7.2 The DDSL(s) will carry out this role where the DSL is unavailable.

4.8 Pupils who have a social worker

4.8.1 Be aware of pupils who have a social worker.

Heath Mount School

Appendix 2 **Types and signs of abuse and specific safeguarding issues**

1 Types of abuse

1.1 Part one of KCSIE 2020 defines the following types of abuse. However, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.

1.2 **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. Abuse can take place wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children. They may be abused by an adult or adults or another child or children.

1.3 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

1.4 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

1.5 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

1.6   **Neglect:** the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2   Signs of abuse

2.1   Possible signs of abuse include, but are not limited to:

2.1.1   the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference;

2.1.2   there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

2.1.3   the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;

2.1.4   the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

2.1.5   the pupil's development is delayed; the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;

2.1.6   the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;

2.1.7   the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers; and

2.1.8   inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

2.1.9   The HSCP can provide advice on the signs of abuse and the DfE advice What to do if you're worried a child is being abused (2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

3   **Specific safeguarding issues**

3.1   Statutory guidance acknowledges the following as specific safeguarding issues:

    3.1.1   bullying including cyber bullying;

    3.1.2   children missing education (see paragraph 3.3 below);

    3.1.3   children and the court system;

    3.1.4   children with family members in prison;

    3.1.5   children missing from home or care;

    3.1.6   child sexual exploitation (see section 3.4 below);

    3.1.8   child criminal exploitation: county lines;

    3.1.9   domestic abuse;

    3.1.10   homelessness;

    3.1.11   so called 'honour based' violence (see 3.6, below);

    3.1.11   drugs;

    3.1.12   fabricated or induced illness;

    3.1.13   faith abuse;

    3.1.14   Female Genital Mutilation (FGM) (see paragraph 3.6.2 below);

    3.1.15   forced marriage (see section 3.6.4 below);

    3.1.16   mental health (see paragraph 3.7 below);

    3.1.18   sexual violence and sexual harassment between children in schools and colleges (see paragraph 17 above).

    3.1.19   private fostering;

   ` 3.1.20   preventing radicalisation (see section 3.7 below);

    3.1.21   sexting (see paragraph 3.8 below);

    3.1.22   trafficking.

3.2   Further advice and links to guidance on these specific safeguarding issues can be found in Annex B of KCSIE 2020. Staff should be particularly aware of the safeguarding issues set out below.

3.3 **Children missing education policy**

3.3.1 A child going missing from School or education, is a potential indicator of a range of possible safeguarding issues. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. They should act to identify any risk of abuse or neglect, including sexual abuse or exploitation in accordance with this Policy.

3.3.2 Where reasonably possible, the School holds more than one emergency contact for each pupil in order to ascertain whether a child is missing.

3.3.3 The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

3.3.4 This will assist the local authority to:

(a) fulfil its duty to identify children of compulsory school age who are missing from education; and

(b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

3.3.5 The School shall inform the local authority of any pupil who:

(a) fails to attend School regularly; or

(b) has been absent without the School's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

3.3.6 School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this Policy if any absence of a pupil from the School gives rise to a concern about his / her welfare.

3.4 **Child sexual exploitation (CSE)**

3.4.1 Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen

online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

3.4.2 In line with the advice from the HSCP, if the School has a specific concern about child sexual exploitation they would contact Hertfordshire Children's Social Care department and also 'Operation Halo', telephone number 101.

3.4.3 Signs of potential CSE include:

a. going missing or regularly returning home late;

b. regularly missing school or opting out of education;

c. suffer from sexually transmitted diseases or become pregnant;

d. demonstrate changes in emotional wellbeing;

e. misuse drugs and alcohol;

f. appearing with unexplained gifts / possessions;

g. associating with other young people involved in exploitation;

h. older boyfriends / girlfriends.

3.4.4 **Reporting CSE:** in addition to the usual child protection concerns reporting, an extra form should be completed in cases of CSE in non-urgent cases. This is sent to the 'Halo' team at Hertfordshire Police on: hqsafeguarding@herts.pnn.police.uk

3.5 **Child Criminal Exploitation (county lines)**

3.5.1 Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks of gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse, county line exploitation:

(a) can affect any child or young person (male or female) under the age of 18 years;

(b) can affect any vulnerable adult over the age of 18 years;

(c) can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;

(d) can be perpetrated by individuals or groups, males or females, and young people or adults; and

(e) is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, and access to economic or other resources.

3.5.2 Signs of involvement with county lines or gangs are:

(a) regularly going missing from home / school and /or being found away from their local area;

(b) being found in possession of unexplained money, clothes or mobile phones;

(c) multiple mobile phones and / or excessive receipt of calls and / or texts;

(d) relationships with controlling, usually older individuals or groups;

(e) leaving home and / or care without explanation;

(f) unexplained injuries;

(g) carrying weapons;

(h) significant decline in school attendance and achievement;

(i) gang association or isolation from peers;

(j) significant changes in emotional wellbeing.

3.6 Honour-based abuse (HBA)

3.6.1 So-called 'honour-based' abuse encompasses crimes committed to protect or defend the honour of the family and / or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so called HBA are abuse (regardless of motivation) and should be handled and escalated as such. Staff should speak to the DSL if they have any doubts.

3.6.2 Serious violence

(a) All staff should be aware of indicators, which may signal that children are at risk from, or involved in violent crime. These may include:

  (i) Increased absence from school;

  (ii) Significant decline in performance;

  (iii) Signs of self-harm or a significant change in wellbeing;

  (iv) Signs of assault or unexplained injuries;

  (v) Unexplained gifts or new possessions.

(b) All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges can be found in the Home Office's: Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance.

3.6.3 Female Genital Mutilation (FGM)

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

(b) There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM (pages 59-61 focus on the role of schools).

(c) All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate.

(d) If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this

Policy. See the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information](#) for further details about the duty.

(e) Guidance published by the [Department for Health](#) also provides useful information and support for health professionals which will be taken into account by the School's medical staff.

3.6.4 Forced marriage

(a) Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

(b) Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the [Multi-agency guidelines: handling case of forced marriage](#).

(c) Staff should speak to the DSL if they have any concerns. Pages 32-36 of the [Multi-agency guidelines: handling case of forced marriage](#) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fco.gov.uk for advice and information.

3.7 Radicalisation and the Prevent duty

3.7.1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

3.7.2 The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

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3.7.3 The School has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas."

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism."

3.7.4 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

3.7.5 Channel duty guidance: protecting vulnerable people from being drawn into terrorism (2015) notes the following:

"36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race / hate crime, lack of self-esteem or identity and personal or political grievances.

51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups)
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group / cause / ideology.

52. Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others."

3.7.6   Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

3.7.7   The DfE's briefing note The use of social media for on-line radicalisation (2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

3.7.8   Advice and support about extremism (including the Channel Programme) is available from Hertfordshire Police (details at page 6 of this policy: key external contacts).

3.8   **Allegations against pupils - peer on peer abuse**

3.8.1   The conduct of pupils towards each other will, in most instances, be covered by the School's behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised. Examples of behaviour by a pupil which may raise safeguarding concerns may include:

(a)   violence, including gender based violence;

(b)   threatening or intimidating behaviour;

(c)   blackmail;

(d)   sexting also known as youth produced sexual imagery. (See the safe and acceptable use of ICT policy, anti-bullying policy and behaviour and discipline policy for the School's approach to sexting);

(e)   encouraging others to engage in inappropriate sexual behaviour;

(f)   any form of inappropriate behaviour by an older pupil towards a younger more vulnerable pupil;

(g)   bullying, including cyber-bullying;

(h)   Initiation / hazing type violence and rituals.

3.8.2   Harmful sexual behaviour is a term that includes sexual violence and sexual harassment. The School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Such behaviours may occur online or offline, may be physical or verbal, are never acceptable and may be criminal. All concerns of peer on peer abuse will be taken seriously and handled sensitively, appropriately, and promptly. The School will take into consideration the context within which any behaviours or incidents have occurred. For example, the School will take into account any wider environmental factors that may be a threat to their safety or welfare.

3.8.3   The School takes steps to minimise the risk of peer on peer abuse. The School has robust anti-bullying procedures in place (see the School's Anti-Bullying Policy) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and appropriate action taken to protect pupils identified as being at risk including risks arising from behaviour in boarding houses (see the School's Risk Assessment Policy for Pupil Welfare).

3.8.4   The School recognises the gendered nature of peer on peer abuse (i.e., that it is more likely that girls will be victims and boys will be perpetrators).

3.8.5   Abusive behaviour by pupils must be taken seriously. Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual harassment is not acceptable.

3.8.6   Allegations against pupils should be reported in accordance with the procedures set out in this Policy (see paragraphs 18). If sexual violence is alleged to have occurred, the DSL will take into account the local response of police and Children's Social Care. The views of the child / children will be taken into account but will not be determinative.

3.8.7   If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Children's Social Care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide

support to the pupil and to accommodate him / her if it is necessary to suspend him / her during the investigation.

3.8.8   The School will treat all children involved as being potentially at risk and ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse and the child who is allegedly responsible for it. Immediate consideration is given to how to best support and protect all children involved / impacted including support from external services as necessary.

3.9   **Mental Health**: incidences of depression, self- harm and eating disorders have all risen in recent years in the UK and are linked to poor mental health. The School is committed to promoting well-being and resilience as well as raising awareness of and eliminating the stigma attached to mental illness. The School recognises that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. The School has a Head of Wellbeing with responsibility for developing a school wide approach to health and well-being for the entire school community and also employs a qualified counsellor. The following websites provide useful advice for parents and pupils:

http://www.youngminds.org.uk/

http://www.mentalhealth.org.uk/

3.10   **Upskirting:**
3.10.1   Upskirting typically involves taking photos 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.
3.10.2   Upskirting is a criminal office and attempting to commit an act of upskirting may also amount to criminal office if there was a clear intention to commit the act, but it failed for some reason.
3.10.3   Any instance of upskirting will be treated by the school as a breach of discipline and also a matter to be dealt with under this policy;
3.10.4   Any images and devices which may have been used in connection with an incident of upskirting will be dealt with in a similar manner to sexting (see paragraph 3.11, below).

3.11   **Sexting:**
3.11.1   'Sexting' means the taking and sending or posting of images or videos of a sexual or indecent nature, usually through mobile picture messages or webcams over the internet.

3.11.2   The sending of an indecent image can be illegal. A person under 16 is committing an offence if they send an indecent image of themselves and someone passing this on is also distributing an indecent image of a child. The School seeks to protect children from

sexting and the significant impact it can have. The School's obligations on sexting are contained in its safe and acceptable use of ICT policy for pupils which reflect the latest DfE guidance.

3.11.3   Staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

3.11.4   The DSL may, in exceptional circumstances, view images with the prior consent of the Head and only where:

(a)   this is the only way to determine whether to involve other agencies due to lack of information about its content;

(b)   it is necessary to report the image to a website or agency to have it taken down; or

(c)   a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

3.11.5   Where an image must be viewed:

(a)   viewing should take place on School premises wherever possible;

(b)   the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

(c)   a senior member of staff should be present to monitor and support the person viewing the image. This member of staff does not need to view the image;

(d)   full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time. The nature of the image and the reasons for viewing it;

(e)   Any member of staff who views an indecent image should be given appropriate support.

3.11.6   If any device needs to be confiscated (for example, in order to view the image or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

3.11.7   If any electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it

contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

3.11.8   If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this has been done. Members of staff should not search devices to delete images.

3.11.9   If images have been shared online and now cannot be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

3.11.10 Where a pupil receives unwanted images, the School should advise the pupil and his / her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

3.11.11 The UK Council for Child Internet Safety's Note 'Sexting in schools and colleges: responding to incidents and safeguarding young people' (2016) contains details of support agencies and provides further information for schools on how to respond to incidents of sexting.

3.11.12 The College of Policing has also produced a briefing note 'Police action in response to youth produced sexual imagery ('sexting')' (November 2016) which provides information on how police forces treat instances of sexting by young persons.

3.11.13 Advice for pupils is available at:

https://www.thinkuknow.co.uk/

https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/

3.8.14 Advice for parents is available at:

https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/

3.12   **Domestic Abuse**: The cross-government definition of domestic abuse is: '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 of family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial or emotional abuse.'

3.13   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 serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Helplines:

http://www.nationaldomesticviolencehelpline.org.uk/

Advice:

http://www.nhs.uk/Livewell/abuse/Pages/domestic-violence-help.aspx

https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/

4.   Special educational needs and disabilities

4.1   The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the Learning Support Policy and Accessibility and Equal Opportunities Policy for further details.

4.2   Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

4.2.1   assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;

4.2.2   pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and

4.2.3   there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

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Appendix 3 Guidance for staff and volunteers on suspecting or hearing a complaint of abuse or neglect

1   **Receiving a disclosure**

   1.1   A member of staff or volunteer suspecting or hearing a complaint of abuse or neglect:

      1.1.1   must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;

      1.1.2   must not ask leading questions, i.e. a question which suggests its own answer;

      1.1.3   must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken; and

      1.1.4   must keep a sufficient written record of the conversation. The record should include:

         (a)   the date and time;

         (b)   the place of the conversation and

         (c)   the essence of what was said and done by whom and in whose presence.

      It must be signed by the person making it, using names and not initials.

   1.2   All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, and computers, must be kept securely with the written record (see below) and passed on when reporting the matter in accordance with this Policy.

2   **Recording the concern**

   2.1   Staff must record all concerns about a child in writing.

   2.2   Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

      2.2.1   the child's details: name, date of birth, address and family details;

      2.2.2   date and time of the event / concern;

      2.2.3   the action taken and by whom;

      2.2.4   the name and position of the person making the record.

2.3   The School has a pro forma record which should be completed and passed on when reporting the matter in accordance with this Policy. This pro-forma is available in all staff rooms. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

Appendix 4   Dealing with allegations against teachers, the Head, Governors, volunteers and other staff

1   **The School's procedures**

1.1   The School's procedures for dealing with allegations made against staff will be used where the teacher, the Head, Governor, volunteer or other member of staff has:

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

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

1.1.3   behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children

1.1.4   1.1.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children.

1.2   Any allegations not meeting these criteria will be dealt with in accordance with the HSCP procedures. Advice from the DO will be sought in borderline cases.

1.3   All such allegations must be dealt with as a priority without delay. The DO(s) will be informed immediately and in any event within one working day of all allegations that come to the School's attention and appear to meet the criteria in paragraph 1.1 above.

1.4   Allegations against a teacher who is no longer teaching and historical allegations will be referred to the Police.

2   **Reporting an allegation**

2.1   The reporting requirements for allegations against a teacher, the Head, Governor, volunteer or other member of staff are set out below.

2.2   Where an allegation or complaint is made against any member of staff (other than the Head), the DSL or a volunteer, the matter should be reported immediately to the Head or in his absence, the Chair of Governors. The allegation will be discussed immediately with the DO(s) before further action is taken. Where appropriate, the Head will consult with the DSL.

2.3   Where an allegation or complaint is made against the Head, the matter should be reported immediately to the Chair of Governors or the Nominated Safeguarding Governor, without first notifying the Head. The allegation will be discussed immediately with the DO(s) before further action is taken. The Chair of Governors will consult the Nominated Safeguarding Governor, and vice versa.

2.4 Where an allegation is made against any Governor, the matter should be reported immediately to the Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the DO(s) before further action is taken. Where appropriate, the Chair of Governors will consult the Nominated Safeguarding Governor, and vice versa.

2.5 If it is not possible to report to the Head or Chair of Governors or Nominated Safeguarding Governor in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chair of Governors and the Nominated Safeguarding Governor.

2.6 The person taking action in accordance with the procedures in this Appendix is known as the "Case Manager".

3 **Disclosure of information**

3.1 The Case Manager will inform the accused person of the allegation as soon as possible after the DO(s) has been consulted.

3.2 The Parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

3.3 Where the DO(s) advises that a strategy discussion is needed, or the police or Children's Social Care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4 **Further action to be taken by the School**

4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part four of KCSIE and the School's employment procedures.

4.2 Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

5   **Ceasing to use staff**

5.1   If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the DBS will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay. The School may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not a regulated activity.

5.2   If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met.

5.3   Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made where a teacher has been dismissed, or would have been dismissed had he / she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

6   **Malicious allegations**

6.1   Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.

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

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

7   **Record keeping**

7.1   Details of allegations found to be malicious will be removed from personnel records.

7.2   For all other allegations, full details will be recorded on the confidential personnel file of the person accused.

7.3   An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

7.4   The School will retain all safeguarding records and relevant personnel records for so long as reasonably required.