



Heath Mount School

Child Protection and Safeguarding Policy and Procedures

Heath Mount School, Hertfordshire

**Independent Day and Boarding School for Boys
and Girls**

September 2024



Heath Mount School

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Definitions

Appropriate Adult	Is a parent, guardian, or social worker, or if no person matching this is available, any responsible person over 18. An appropriate adult must be present when a juvenile (under 18) or vulnerable person is detained or questioned by the police.
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
Children's Social Care	
Care	Includes, depending on the context, the team based in the local authority where the school is located and, where appropriate, the team based in the local authority where the child is resident.
CSE	Child Sexual Exploitation
DO	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) (DDSLs) where the DSL is unavailable
DDSLs	Deputy Designated Safeguarding Lead. The school has two.
EYFS	Early Years Foundation Stage
FGM	Female Genital Mutilation
GDPR	General Data Protection Regulations
HSB	Harmful Sexual Behaviour. This is a reference to the DfE's definition of problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards themselves or others or abusive towards another child, young person or adult.
HSCP	Hertfordshire Safeguarding Children Partnership
KCSIE	Keeping Children Safe in Education (September 2024) (Statutory Guidance)



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LADO	Local Authority Designated Officer. The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaising with the three safeguarding partners
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
SVSH	Sexual violence and sexual harassment
TRA	Teaching Regulatory Authority
Working Days	Means Monday – Friday when the School is open during term time. The term dates are published on the School's website. If referrals to an outside agency are required outside of term time, references to working days are the days on which the relevant external agency is working.



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Key School Contacts

Designated Safeguarding and Prevent Lead Lauren Ditchfield (Deputy Head Pastoral)	Email: ditchfieldla@heathmount.org Telephone number: 01920 830 230, ext. [] Mobile number: 07824312624
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 Victoria Steward (School Counsellor)	Email: stewardvi@heathmount.org Mobile number: 07947 506215
Headmaster 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 Juliette Hodson	Email: juleshodson@gmail.com Mobile number: 07967 030929
Independent Listener Rev. Richard Dent	Telephone number: 07768657109



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Key External Contacts

Designated Officer(s) of the Local Authority:

- Paula Lewis
- Andrea Garcia- Sangil
- Yvette Morello

Telephone number:

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

Email: LADO.referral@hertfordshire.gov.uk

Hertfordshire Children's Social Care department:

Hertfordshire County Council, 0300 123 4043
Children's Services:
Safeguarding and Specialist
Services

Consultation Hub 01438 737511

Schools and colleges can ring the
Consultation Hub (for concerns
that are not of immediate risk of
harm),

Local Authority out of hours 0300 123 4043
contact number

Paula Hayden 07811 822057 (tbc)
paula.hayden@hertfordshire.gov.uk

Team Manager: LADO & CPSLO
Quality Assurance, Improvement
and Practice



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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

NSPCC Whistleblowing helpline: The National Society for the Prevention of Cruelty to Children (**NSPCC**)

NSPCC
Weston House
42 Curtain Road
London
EC2A 3NH

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

NSPCC support Line for potential victims of sexual harassment and abuse in educational settings

Telephone: 0800 136 663

<https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>

UK Safer Internet Centre

Telephone: 0344 381 4772 (Monday – Friday 10.00am – 4.00pm)

Email: helpline@saferinternet.org.uk

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

Reporting serious wrongdoing to the Charity Commission

For further guidance see: <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>



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1 Policy statement

- 1.1 Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Every pupil should feel safe and protected from any form of abuse, neglect and exploitation within a whole school culture of safety, protection, and equality. All staff should understand the indicators of abuse and specific safeguarding issues so that they can identify them and report any concerns about pupils. Appendix 2 sets out the forms of abuse, neglect and exploitation and specific safeguarding risks. 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.
- 1.2 This policy is part of the School's whole school approach to promoting child safeguarding and wellbeing, which aims to ensure that the best interests of pupils is at the heart of all decisions, processes, and policies.
- 1.3 Keeping Children Safe in Education (2024) (KCSIE) defines safeguarding and promoting the welfare of children as protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- 1.4 This policy is necessarily detailed. Nevertheless, it is important that the School's safeguarding policy and procedures are transparent, clear, and easy to understand for staff, pupils, parents, and carers. Safeguarding procedures are regularly promoted and are easily accessible for children to confidently report any form of abuse, neglect or exploitation, knowing their concerns will be treated seriously. The School welcomes feedback on how it can improve its safeguarding procedures.

2 Aims

- 2.1 The aims of this policy are as follows:
 - 2.1.1 to actively safeguard and promote the welfare of pupils, staff and others who come into contact with the School and protect them from harm;
 - 2.1.2 to actively promote the wellbeing of pupils;



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- 2.1.3 to maintain clear processes for dealing with and referring concerns about the welfare of any pupil and allegations of abuse, neglect and / or exploitation;
- 2.1.4 to raise awareness of how to report concerns and how they will be investigated whether they are current or historic in nature;
- 2.1.5 to raise staff awareness of the School's safeguarding expectations;
- 2.1.6 to raise awareness of how to report concerns and ensure they are appropriately investigated;
- 2.1.7 to ensure staff are competent to carry out their safeguarding responsibilities and are supported in this role;
- 2.1.8 to maintain good safeguarding practices throughout the School, including the promotion of a zero-tolerance approach to child-on-child sexual violence and sexual harassment (SVSH) so that pupils are confident to report it and staff are confident to both identify and respond to it and;
- 2.1.9 to promote a whole school culture of safety, equality, and protection.
- 2.2 All members of the school community (including alumni) should feel able to raise safeguarding concerns, safe in the knowledge that they will be taken seriously, be supported and that the matter will be handled sensitively, and appropriate action taken.
- 2.3 Anyone about whom a concern is raised should feel confident that they will be supported, the matter will be handled sensitively, and appropriate action taken.

3 Equality Statement

- 3.1 Some children have an increased risk of abuse, both online and offline, and additional barriers can exist to some children with respect to recognising or disclosing it. The School is committed to anti-discriminatory practice and recognises children's diverse circumstances. The School understands and recognises their obligations under the Equality Act 2010 and that it must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

4 Regulatory Framework

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



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- 4.1.1 Education (Independent School Standards) Regulations 2014;
- 4.1.2 Statutory Framework for the Early Years Foundation Stage (DfE, 2021);
- 4.1.3 Education and Skills Act 2008
- 4.1.4 The Children Act 1989;
- 4.1.5 The Children Act 2006;
- 4.1.6 Children and Social Work Act 2017;
- 4.1.7 Data Protection Act 2018 and General Data Protection Regulation (GDPR);
- 4.1.8 Equality Act 2010;
- 4.1.9 Charities Act 2011;
- 4.1.10 Human Rights Act 1998.
- 4.2 This policy further has regard to the following guidance and advice:
 - 4.2.1 Keeping Children Safe in Education (2024) (KCSIE);
 - 4.2.2 Working together to safeguard children (WTSC DfE, December 2023);
 - 4.2.3 Behaviour in schools: advice for headteachers and school staff (DfE, February 2024);
 - 4.2.4 Disqualification under the Childcare Act 2006 (DfE 2018);
 - 4.2.5 Prevent duty guidance for England and Wales (HM Government December 2023);
 - 4.2.6 Channel Duty Guidance: protecting people susceptible to radicalisation (HM Government 2023);
 - 4.2.7 Multi-agency statutory guidance on FGM (HM Government 2020);
 - 4.2.8 What to do if you're worried a child is being abused: advice for practitioners (HM Government 2015);
 - 4.2.9 Virginity testing and hymenoplasty: multi-agency guidance (DHCS, 2022);
 - 4.2.10 Information sharing: advice for practitioners providing safeguarding services (HM Government 2023);
 - 4.2.11 Sharing nudes and semi-nudes: advice for education settings working with children and young people (HM Government 2024)



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- 4.2.12 Children Missing Education (DfE, 2016);
- 4.2.13 Child Sexual Exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from exploitation (DfE, 2017);
- 4.2.14 Mental Health and Behaviour in Schools (DfE 2018);
- 4.2.15 Searching, screening and confiscation: advice for schools (DfE, 2023);
- 4.2.16 Listening to and involving children and young people (DfE, January 2014);
- 4.2.17 Safeguarding children and protecting professionals in early years settings: online safety considerations (UK Council for Internet Safety, 2019);
- 4.2.18 Teaching online safety in schools (DfE 2023);
- 4.2.19 Harmful online challenges and online hoaxes (DfE 2021);
- 4.2.20 Working together to improve school attendance (DfE 2024)
- 4.2.21 Keeping children safe in out of school settings (DfE 2022)
- 4.2.22 Digital technology standards in schools and colleges (2023)
- 4.2.23 Educate against hate (HM government);
- 4.2.24 Data Protection in Schools (DfE February 2023);
- 4.2.25 Strategy for dealing with safeguarding issues in charities (Charity Commission, 2017);
- 4.2.26 Safeguarding and protecting people for charities and trustees (Charity Commission, June 2022);
- 4.2.27 Regulatory alert to charities – safeguarding (Charity Commission, 2017);
- 4.2.28 How to respond to a serious incident in your charity (Charity Commission, updated 2019);
- 4.2.29 Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, updated June 2019);
- 4.2.30 Reporting a serious incident in your charity when it involves a partner (Charity Commission, December 2019);
- 4.2.31 Guidance on reporting a safeguarding concern in a charity (Department for Digital, Culture, Media and Sport, 2022);



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- 4.2.32 Relationships education, relationships and sex education and health education guidance (DfE 2021);
- 4.2.33 National Minimum Standards for Boarding Schools (2022);
- 4.2.34 Equality Act 2010: advice for schools (DfE 2018);
- 4.2.35 PACE code C 2019 and;
- 4.2.36 Hertfordshire Safeguarding Children Partnership (HSCP) guidance.
- 4.3 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:
 - 4.3.1 follow the local inter-agency procedures of the HSCP;
 - 4.3.2 ensure that the School practices safer recruitment in checking the suitability of staff, Governors, and volunteers (including staff employed by another organisation) to work with children and young people;
 - 4.3.3 maintain a Single Central Register (SCR) of appointments for all staff and a separate section within the SCR for all volunteers;
 - 4.3.4 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 paragraphs 15 and 16);
 - 4.3.5 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;
 - 4.3.6 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;
 - 4.3.7 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;
 - 4.3.8 be alert to the needs of children with physical and mental health conditions;
 - 4.3.9 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol, and substance misuse;
 - 4.3.10 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;



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

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.

5 **Application and accessibility**

- 5.1 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. It applies whether pupils or staff are on arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of school hours and in the holidays.
- 5.2 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.
- 5.3 This policy applies to core school activities and to out of hours and commercial activities.
- 5.4 This policy aims to address the School's charity law safeguarding duty to:
 - 5.4.1 Provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff, and volunteers;
 - 5.4.2 Provide a culture that prioritises safeguarding so that those affected have the assurance that it is safe to report incidents and they will be handled sensitively and properly;
 - 5.4.3 Have adequate safeguarding policies procedures and measures in place to protect people;
 - 5.4.4 Provide a clear process on the handling of incidents and allegations, including reporting to the police, local authority, and the Charity Commission;
 - 5.4.5 Adhere to the specific statutory obligations on the School to safeguard and promote the welfare of children.
- 5.5 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.

6 **Related policies**

- 6.1 The following policies, procedures and resource materials are also relevant to the School's safeguarding practices:
 - 6.1.1 staff code of conduct;



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- 6.1.2 staff acceptable use of ICT policy;
- 6.1.3 staff social media policy;
- 6.1.4 whistleblowing policy;
- 6.1.5 Recruitment, selection and disclosure policy;
- 6.1.6 anti-bullying policy;
- 6.1.7 safe and acceptable use of ICT policy for pupils;
- 6.1.8 visitors and security policy;
- 6.1.9 risk assessment policy for pupil welfare;
- 6.1.10 missing pupil policy;
- 6.1.11 learning support policy;
- 6.1.12 equal opportunities policy;
- 6.1.13 first aid policy;
- 6.1.14 Standard Operating Procedures for the Medical Centre;
- 6.1.15 behaviour and discipline policy;
- 6.1.16 Relationships, Education and Relationships Sex Education policy;
- 6.1.17 Equality, Diversity and Inclusion Policy and;
- 6.1.18 procedures and updates for the governance of school safeguarding.

7 **Prevent policy**

- 7.1 The School will also follow guidance in relation to the specific safeguarding issues outlined in Appendix 2. This includes the Prevent Duty Guidance 2023, in the exercise of its functions, to have due regard to the need to prevent people from being drawn into terrorism.

8 **Safeguarding principles in relation to pupils**

- 8.1 Safeguarding and promoting the welfare of children is everyone's responsibility.
- 8.2 The School will act in the best interests of the child so as to promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.
- 8.3 The School will:



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- 8.3.1 understand its role in the safeguarding partnership arrangements and follow the local inter-agency procedures of the HSPB;
- 8.3.2 be alert to the signs of abuse, whether they be in school, within the child's family or outside and take steps to protect individuals from any form of abuse or neglect, whether from an adult or another child;
- 8.3.3 include opportunities within the curriculum for pupils to develop the skills they need to recognise, and stay safe from abuse;
- 8.3.4 promote the systems in place for pupils to confidentially report abuse, ensuring they know their concerns will be treated seriously and that they can express their views and give feedback;
- 8.3.5 deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;
- 8.3.6 maintain procedures which, as far as possible, ensure that staff, pupils, and others who are innocent are not prejudiced by malicious, false, unsubstantiated, or unfounded allegations;
- 8.3.7 assist staff to identify children who may benefit from Early Help and encourage them to be particularly alert to the potential need for Early Help for children with the indicators listed in KCSIE or WTSC;
- 8.3.8 be vigilant for children at potentially greater risk or harm including children who need a social worker or mental health support;
- 8.3.9 be alert to the needs of pupils with physical or mental health conditions, special educational needs, or disabilities (SEND), which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and where additional barriers can exist when detecting abuse or neglect;
- 8.3.10 foster a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them;
- 8.3.11 operate robust and sensible health and safety procedures and clear and supportive policies on drugs, alcohol, and substance misuse;
- 8.3.12 assess the risk of pupils 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;
- 8.3.13 identify pupils who may be vulnerable to radicalisation and know what to do when they have been identified;
- 8.3.14 identify pupils who may be vulnerable to being drawn into county lines or other gang activities;



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8.3.15 consider and develop other safeguarding procedures which may be specific to individual pupils in the school or in the local area and;

8.3.16 Allow staff to build trusted relationships with pupils which facilitate communication.

9 Contextual safeguarding

9.1 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.

9.2 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.

9.3 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.

9.4 **Extra-familial harm:** All staff, but particularly the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harm can take a variety of forms. Children can be vulnerable to harms including (but not limited to) sexual abuse (including harassment and exploitation) domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, child sexual exploitation, serious youth violence, county lines and radicalisation and consensual and non-consensual sharing of nude and semi-nude images and / or violent Staff are aware that extra-familial harm can present online, in a child's environment neighbourhood, school and any place that children occupy or access.

10 Female Genital Mutilation (FGM)

10.1 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.

11 Responsibility Statement and allocation of tasks: the School's approach to safeguarding leadership

11.1 The Board of Governors has overall responsibility for all matters which are the subject of this policy including:

11.1.1 Legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the School, having regard to relevant guidance issued by the Secretary of State;

11.1.2 Strategic leadership responsibility for the School's safeguarding arrangements; and



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11.1.3 Specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.

11.2 The Governing Body

11.2.1 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;

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

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

11.2.4 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.

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

11.3 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 6 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:

11.3.1 the safeguarding audit and annual safeguarding checklist;

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

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

11.3.4 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;

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

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

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



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11.4 During visits the Safeguarding Governor may also:

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

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

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

1.1.1 The Safeguarding Governor uses a checklist to assist with covering as many of the above points as practicable during their 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.

12 The Head

12.1.1 is responsible for the overall management of the School and for the management of concerns and allegations about staff;

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

13 Designated Safeguarding Lead

13.1 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). The DSL can be contacted by phone.

13.2 The DSL has the appropriate status and authority within the School and the time, funding, training, resources, and support to enable her to provide advice and support to other staff on child welfare, safeguarding 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.

13.3 The DSL will liaise with the Head to advise and update them on issues relating to police investigations and the statutory requirement for children to have an appropriate adult (see also, paragraph 3.2, Appendix 1).

13.4 The name and contact details of the DSL / DDSLs 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 and Annex C of KCSIE 2024.

13.5 The DSL takes lead responsibility for all aspects of safeguarding and child protection throughout the School (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL will



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meet with the Nominated Safeguarding Governor at least on a termly basis. (See also paragraph 11.3).

13.6 If the DSL is unavailable, the activities of the DSL will be carried out by one of the two Deputy Designated Safeguarding Leads, ('DDSLs') as appropriate. The DDSLs are trained to the same standard as the DSL.

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

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

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

14.1.1 protect children from abuse;

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

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

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

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

14.2 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.

15 **Training**

15.1 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.

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

15.3 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.

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

15.5 The School maintains electronic records of all staff training.



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16 Induction

All staff are provided with the School's safeguarding contacts card and have an induction meeting with the DSL. All staff are provided with induction training that includes:

- 16.1.1 this Policy;
- 16.1.2 the identity, role, and contact details of the DSL and DDSLs;
- 16.1.3 the School's approach to online safety, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- 16.1.4 the School's Anti-Bullying Policy (covering measures to prevent bullying, cyber-bullying, prejudice-based bullying, and discriminatory bullying);
- 16.1.5 the School's Behaviour and Discipline Policy for pupils;
- 16.1.6 the staff code of conduct including the whistleblowing policy, staff social media policy and the staff acceptable use of technology policy;
- 16.1.7 the safeguarding response to children who have unexplained and / or persistent absences from education, particularly on repeat occasions and for prolonged periods;
- 16.1.8 child protection training in accordance with HSCP procedures including guidance on managing a report of child on child abuse and harmful sexual behaviour;
- 16.1.9 a copy of Part 1 (including Annex B of KCSIE 2024) whether the member of staff works directly with children or not and;
- 16.1.10 appropriate Prevent training.

17 Child protection training

- 17.1 The SMT and all staff will receive a copy of this Policy and Part 1 (and Annex B) of KCSIE 2024 whether they work directly with children or not. They will be required to confirm that they have read and understood these. Each time Part 1 and Annex B 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.
- 17.2 Members of the SMT and the Nominated Safeguarding Governor will receive a copy of this policy and be expected to read all of KCSIE.
- 17.3 All staff members will undertake appropriate child protection training which will be updated at least 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



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updates via email, e-bulletins and staff meetings on a regular basis and at least annually.

- 17.4 All staff members will receive regularly updated online safety training to ensure they have an understanding of the School's expectations, and the applicable roles and responsibilities in relation to filtering and monitoring.
- 17.5 Where assessed as appropriate for the role, staff training will also include training on , searching pupils for prohibited and banned items and Prevent awareness training 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 and young people for further help.
- 17.6 This training is to equip staff to raise concerns appropriately by ensuring they have the knowledge and confidence to keep children safe and know how to refer children for further help.
- 17.7 In addition, the School will make an assessment of the appropriate level of focus and responsiveness to specific safeguarding concerns including radicalisation, child-on-child abuse, harmful sexual behaviour (HSB), child criminal and child sexual exploitation, Female Genital Mutilation (FGM), cyberbullying, prejudice-based and discriminatory bullying, gangs and mental health and to ensure staff have the knowledge and skills to keep looked after children safe. All governors receive safeguarding training (including online safety) on induction and will also receive the safeguarding and child protection updates at least annually. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole school approach to safeguarding.
- 17.8 The Safeguarding Governor and the Chair of Governors will receive appropriate training to enable them to fulfil their safeguarding responsibilities. As part of their training, the governors are expected to read Part 2 of KCSIE as a minimum. The nominated safeguarding governor is expected to read the entirety of KCSIE. This training will be regularly updated.
- 17.9 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. This includes information on how staff can report concerns out of hours / out of term-time.

18 Designated Safeguarding Lead

- 18.1 The DSL and DDSs will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes, inter-agency working and 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,



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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 DDSs, see Appendix 1.

- 18.2 Prevent duty training will be consistent with the government's Prevent duty guidance for schools (2023) and the Educate Against Hate website for further details.

19 **Teaching pupils about safeguarding**

- 19.1 The School teaches pupils about safeguarding, including online safety, through the curriculum and extra-curricular programme, Personal, Social, Health and Economic Education (PSHEE) and Relationship and Sex Education (RSE), assemblies and form time. This includes including guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy relationships with others and providing information on who they can turn to for help.
- 19.2 The School recognises that a 'one size fits all' approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children may be needed.
- 19.3 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.
- 19.4 Parents are offered advice via the School newsletters and are invited to talks on a variety of subjects including online safety.
- 19.5 Pupils are taught about harmful sexual behaviours, including SVSH, through PSHEE and Spiritual, Moral, Social and Cultural Education (SMSC) appropriate to both their age and stage of development. This will tackle, at an age-appropriate stage, issues such as: healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality, body confidence and self-esteem, how to recognise abusive relationships, including coercive and controlling behaviour, concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, so called 'honour-based' violence and how to access support, what constitutes sexual harassment and sexual violence and why these are always unacceptable.
- 19.6 Pupils have the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which they can raise any concerns. This may be their teacher, but it may also be any adult with whom they feel comfortable.



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- 19.7 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.
- 19.8 At appropriate points in the curriculum, pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of RSE and computing. Teaching follows best practice in delivering safe and effective education, including putting safeguarding first; approaching from the perspective of a child, promoting dialogue and understanding; empowering and enabling children and young people; never frightening or scare-mongering and challenging victim-blaming attitudes.

20 **Filtering and monitoring**

- 20.1 The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT systems. The School's systems are as follows:
- 20.1.1 The School uses 'Smoothwall' to block access to harmful sites and content. This provides the DSL with immediate breach notifications and weekly reports.
- 20.1.2 The School uses 'SOPHOS' anti-virus software.
- 20.2 Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful content online (content risk); reduce the risk of children being subjected to harmful online interaction with others, including commercial advertising and grooming (contact risk); restrict access to online risk such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of harm, or causes harm, for example, sending and receiving explicit messages.
- 20.3 The School ensures compliance with the DfE's 'Filtering and monitoring standards for schools' by identifying and assigning roles and responsibilities to manage filtering and monitoring systems as follows:
- 20.3.1 The DSL has lead responsibility for online safety, including overseeing and acting on filtering and monitoring reports. Safeguarding concerns and checks to filtering and monitoring systems.
- 20.3.2 Ensuring that the School's IT team have technical responsibility for maintaining filtering and monitoring systems, providing filtering and monitoring reports to the DSL and completing actions following concerns or checks to systems.



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- 20.3.3 Ensuring that the School's IT team work with SMT and the DSL to procure systems, identify risk, carry out reviews and carry out checks.
- 20.3.4 Reviewing the filtering and monitoring provision of the School at least annually.
- 20.3.5 Blocking harmful and inappropriate content without unreasonably impacting learning.
- 20.3.6 Having effective monitoring strategies in place to meet the School's safeguarding needs.
- 20.4 Further details of the School's policy and procedures in relation to online safety can be found in the School's Online Safety policy and Staff / Pupil Safe and Acceptable Use Policies, including the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.
- 20.5 The School is in regular contact with parents and carers to reinforce the importance of pupils being safe online and to make them aware of the systems in place to filter and monitor online use and the sites pupils are expected to access.

21 **Reporting obligations of staff in relation to safeguarding**

- 21.1 Staff should maintain an attitude of 'it could happen here' in relation to safeguarding. When concerned about the welfare of a pupil, staff members should always act in the best interests of the child.
- 21.2 Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences are harmful, e.g., a child may feel embarrassed, humiliated, or threatened due to their vulnerability, disability and / or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.
- 21.3 All staff have a duty to:
 - 21.3.1 report any concerns they may have about the safety and / or wellbeing of pupils;
 - 21.3.2 report any concerns they may have about the safety and / or wellbeing of pupils or other persons associated with the School;
 - 21.3.3 report any concerns about staff or anyone else associated with the School; and



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

21.4 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of SMT or directly to Children's Social Care (whether the School's local authority or that local to the child's home address) or police in their absence for guidance.

22 **Procedures if staff are concerned about a child**

22.1 The child protection training provided to staff considers the forms of abuse and specific safeguarding issues staff must be aware of. Examples of forms of abuse and specific safeguarding issues are set out in Appendix 2.

22.2 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.

22.3 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 (whether the School's local authority or that local to the child's home) or the Police in their absence for guidance.

22.4 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 a potentially 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.

22.5 If a concern involves an allegation against a member of staff, this must be recorded in accordance with the procedures at Appendix 5.

23 **Internal support for pupils**

23.1 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).

23.2 The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from Children's Social Care where necessary.

23.3 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.

23.4 Additional support is provided by the following pastoral staff: The Deputy Head (Pastoral); the Headmaster 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



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School's Independent Listener. This pastoral team are available to provide support to pupils with any issues they may have.

23.5 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.

23.6 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.

24 **What if the DSL is unavailable?**

24.1 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 6.

24.2 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.

24.3 The School has two 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.

24.4 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 28 for how to make a referral.

24.5 Any action should be shared with the DSL or DDSL(s), or a member of SMT as soon as possible.

25 **Early help**

25.1 Early help is support for children of all ages as soon as a problem emerges at any point in a child's life that improves resilience and outcomes or reduces the chance of a problem getting worse. Working Together to Safeguard Children provides detailed guidance on the Early Help process. 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.



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- 25.2 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:
- 25.2.1 is disabled or has certain health conditions and has specific additional needs;
 - 25.2.2 has special education needs or disabilities (SEND) (whether or not they have a statutory Education, Health and Care Plan);
 - 25.2.3 is a young carer;
 - 25.2.4 has a mental health need;
 - 25.2.5 is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups;
 - 25.2.6 is frequently missing / goes missing from education, home or care;
 - 25.2.7 is misusing drugs or alcohol themselves;
 - 25.2.8 is at risk of modern slavery, trafficking sexual and / or criminal exploitation;
 - 25.2.9 is in a family circumstance presenting challenges for the child such as substance abuse, adult mental health problems or domestic abuse;
 - 25.2.10 has a parent or carer in custody or is affected by parental offending;
 - 25.2.11 is looked after or has returned home to their family from care;
 - 25.2.12 is at risk of being radicalised or exploited;
 - 25.2.13 is a privately fostered child;
 - 25.2.14 is at risk of 'honour' based abuse such as Female Genital Mutilation (FGM) or Forced Marriage or;
 - 25.2.15 has unexplainable and / or persistent absence from education, including persistently absences for part of the school day.
- 25.3 A member of staff or volunteer who considers that a pupil may benefit from early help should keep a written record of their concerns (see paragraph 45 and Appendix 3) in the first instance and 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.



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25.4 If early help is appropriate, the DSL will generally take the lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases as the lead practitioner.

25.5 The matter will be kept under review and consideration will be given to a referral to Children's Social Care for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be getting better.

26 What to do if staff have a concern about a pupil's welfare

26.1 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 33 and Appendix 5 for the procedures for dealing with allegations made and / or concerns raised about staff in the School.

26.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support to an emerging problem or a potentially unmet need or 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.

26.3 If the concern involves an allegation or concern raised about a member of staff, supply staff, contractors, or volunteers, this must be reported in accordance with the procedures set out in Appendix 5 and Parts 1 and 4 of KCSIE.

27 Action by the DSL

27.1 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:

27.1.1 Managing any support for the pupil internally via the School's pastoral support processes, seeking advice from Children's Social Care when required;

27.1.2 an Early Help Assessment (see paragraph 26 above);

27.1.3 a referral to statutory services (see paragraph 30 below);

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

27.2 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.

27.3 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



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terrorism or in instances of allegations against children (child-on-child abuse).

- 27.4 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.

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

- 28.1 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 7 for contact details) and / or the police immediately.
- 28.2 Anybody can make a referral in these circumstances. See paragraph 30 below for details on making a referral.
- 28.3 If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

29 **Making a referral**

- 29.1 **If a child is suffering, or is likely to suffer harm, a referral to Children's social care and / or the police immediately (see: when to call the Police: guidance for schools and colleges (npcc.police.uk)). The contact details for Children's Social Care are set out at page 7 of this policy.**
- 29.2 Harm is the *'ill treatment or impairment of the health or development of a child.'* Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined *'significant'* by *'comparing a child's health and development with what might reasonably be expected of a similar child.'*
- 29.3 Anyone can contact Children's Social Care to discuss concerns prior to making a referral. This includes professionals as well as a child, family members and members of the public. Parental consent is not required for referrals to statutory agencies. The contact details for Children's Social Care are set out at page 7 of this policy.
- 29.4 The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information to support decision-making in relation to contacting Children's Social Care.
- 29.5 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. In broad terms, this will include:
- 29.5.1 personal details of the child;
- 29.5.2 detailed information regarding the concern and;



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29.5.3 family information, about the child's family, including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors which may impact the child's parents' or carers' capacity to parent.

29.5.4 Children's Social Care may undertake a statutory assessment under the Children Act 1989 regarding the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

- a. Children in Need: this is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly further impaired without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.
- b. Children suffering or likely to suffer significant harm: Local authorities have a duty under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering or is likely to suffer, significant harm.

29.6 Anyone can make a referral. If the referral is made by telephone, this should be followed up in writing. All reports of concern should be recorded and reported via MyConcern. The record of concern should be completed in as much detail as possible, using the child's own words.

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

29.8 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 22 of KCSIE 2024 and the flowcharts set out at Chapter 3 of WTSC are helpful to illustrate the likely actions and decisions required.

29.9 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 7 for contact details).

29.10 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.



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30 **Allegations against pupils – child on child abuse**

- 30.1 All allegations against and concerns about pupils should be reported according to the procedures in this policy. Further information on child-on-child abuse can be found at Appendix 4.
- 30.2 If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE, considering the local response of the police and Children's Social Care to these issues. The views of the alleged victim will be taken into account but will not be determinative.
- 30.3 All those involved in such allegations, both victim and perpetrator, will be treated as being at risk and in need of support under the safeguarding procedures in this policy. Appropriate support will be provided to all pupils involved, including support from external agencies if necessary.

31 **What to do if staff have a concern about someone else's welfare**

- 31.1 If staff have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, they should report them.
- 31.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

32 **Dealing with allegations made and / or concerns raised about staff and others in the School**

- 32.1 The School has procedures for dealing with allegations made and / or concerns raised against staff or anyone working in the School, including supply staff, volunteers, and contractors.
- 32.2 The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harm threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from malicious, false, unsubstantiated, or unfounded allegations. These procedures are set out in Appendix 5 and follow Parts 1 and 4 of KCSIE.
- 32.3 The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.
- 32.4 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 Appendix 5.
- 32.5 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.



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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.

- 32.6 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 8 of this policy for the relevant contact details).
- 32.7 Staff may also report concerns direct to the School's Local Authority or to the Charity Commission if they consider that the School has failed to deal with concerns appropriately.

33 Missing Child Procedures

- 33.1 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.

34 Informing parents

- 34.1 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 and / or the pupil 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.
- 34.2 Where a pupil has made a disclosure which relates to a family member, the parents should not be informed unless advised by the safeguarding team and Children's Social Care. See also Appendix 3.
- 34.3 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.
- 34.4 See also paragraph 9 of Appendix 5 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer, or the Head.



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35 **Additional Reporting**

35.1 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:

35.1.1 **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.

35.1.2 **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 respond to a serious incident in your charity' (Charity Commission, June 2019).
- b. The School will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy.

35.1.3 **Disclosure and Barring Service (DBS)**

- a. A referral to the DBS will be made promptly if the criteria are met (see Appendix 5).

35.1.4 **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 5).

35.1.5 **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 timescale 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.

36 **Secure School Premises**

36.1 The School will take all practical steps to ensure that School premises are as secure as circumstances permit. This includes measures such as the use



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of a secure entry system, visible staff and visitor lanyards and security guard-controlled access to the School.

- 36.2 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).

37 Risky Areas

- 37.1 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.

38 Boarding

- 38.1 Boarding schools have additional factors to consider regarding safeguarding. The School, and in particular all staff working in the Boarding Houses, are alert to these additional safeguarding factors. Amongst other things, boarding staff should be alert to the extra vulnerabilities of SEND children in such settings, inappropriate pupil relationships and the potential for child-on-child abuse.
- 38.2 Boarding schools have additional requirements regarding safeguarding under the National Minimum boarding Standards (NMBS) which include:
- 38.2.1 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;
- 38.2.2 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;
- 38.2.3 The Missing Pupil Policy and the procedures to be used when searching for a missing boarder;
- 38.2.4 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
- 38.3 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 5 of this Policy. Arrangements may be made for accommodation away from children until the investigation is complete and the results have been disclosed.



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39 **Safer Recruitment and Supervision of Staff**

- 39.1 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). Some staff are trained in safer recruitment and at least one will be on each interview panel. Full details of the School's safer recruitment procedures for checking the suitability of staff are set out in the School's Recruitment, Selection and Disclosure Policy and Procedures.
- 39.2 The School maintains a Single Central Register of appointments for all staff.
- 39.3 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.

40 **Visiting Speakers**

- 40.1 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.

41 **Arrangements for the use of school premises for non-school activities**

- 41.1 When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.
- 41.2 Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.
- 41.3 The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.
- 41.4 DSL/DDSLs can be contacted via the numbers on page 6 of this policy. All those using school premises for non-school activities will be given these contact details.



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41.5 The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

41.6 When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's guidance 'Keeping children safe in out-of-school settings' (April 2022).

42 Use of mobile technology

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

42.1.1 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. Boarding pupils are allowed to bring mobile phones onto site in order to make brief calls home at night only. These are handed in and kept in a secure location at all other times, thereby ensuring that use is limited and controlled appropriately.

42.1.2 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 or when given specific, one-off permission by the Head. In this event, the Head would need to see evidence that all photos were deleted once they have been transferred to the School.

42.1.3 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.

42.1.4 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.

42.1.5 The School allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including the use of filters and the monitoring of usage.



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43 **Risk assessment**

- 43.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risk identified (see also, Risk Assessment for Pupil Welfare Policy).
- 43.2 The format of risk assessments may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans such as behaviour or healthcare and education plans as appropriate. Regardless of the format used, the School's approach to promoting pupil welfare will be systematic and pupil focused.
- 43.3 The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored, and evaluated.
- 43.4 Day to day responsibility for ensuring that risk assessments are carried out is with the DSL who has been properly trained in and tasked with carrying out such risk assessments.

44 **Record keeping**

- 44.1 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.
- 44.2 Staff must record all concerns about a child's welfare on MyConcern. Staff without internet access must report in person immediately to the DSL / DDSL or their line manager who will support them in reporting their concern. Guidance on record keeping is set out in Appendix 3.
- 44.3 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if / when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:
 - 44.3.1 a clear and comprehensive summary of the concern;
 - 44.3.2 details of how the concern was followed up and resolved;
 - 44.3.3 a note of any action taken, decisions reached and the outcome.
- 44.4 If in doubt about recording requirements, staff should discuss with the DSL or DDSL.
- 44.5 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 details of the action taken.



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- 44.6 The DSL should ensure child protection files are only accessed by those who need to see them and where the file or content within a file are shared, this happens in line with information sharing advice as set out in Part 1 and Part 2 of KCSIE.
- 44.7 The records created in accordance with this policy may 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.

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

- 45.1 The School will treat all safeguarding information with an appropriate level of confidentiality, 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.
- 45.2 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare and safety of others, which is always the primary concern of the School. The School understands that the GDPR and Data Protection Act 2018 and the DfEs guidance: 'Data Protection in Schools' (February 2023) provide a framework to ensure that personal information is shared appropriately.
- 45.3 When the School receives a request for safeguarding information (for example, a Subject Access Request or a request from the police) the School will consider its response to ensure that any disclosure accords with its obligations under the GDPR and the UK Data Protection Act 2018. The School will also have regard to its data protection policies. The DSL will work closely with the Bursar and Network Manager to determine what should be disclosed.
- 45.4 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 the Children Act 1989.
- 45.5 Where allegations have been made against staff, the School will consult with the Designated Officer (DO) and, where appropriate, the police and Children's Social Care to agree the information that should be disclosed and to whom.
- 45.6 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.



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46 **Monitoring and review**

- 46.1 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.
- 46.2 Any safeguarding 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.
- 46.3 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.
- 46.4 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.
- 46.5 The full Governing Body should also consider independent corroboration, such as:
- 46.5.1 inspection of records or feedback from external agencies including the DO(s);
 - 46.5.2 reports of ISI inspections;
 - 46.5.3 the outcome of any complaints, claims or related proceedings; and
 - 46.5.4 press reports.
- 46.5.5 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.



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Ratified by the Full Board of Governors

Date	2024
Effective date of the policy	September 2024
Review date of the policy	September 2025



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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 5 should be followed). The DSL provides support, advice and expertise on all matters concerning safeguarding and child protection (including online safety and the School's filtering and monitoring processes).
- 2 The contact details for the DSL and DDSLs for the School are set out at page 6.
- 3 **In accordance with Annex C of KCSIE, the main responsibilities of the DSL are:**

3.1 Managing referrals

3.1.1 The DSL is expected to refer cases:

- a. of suspected abuse and neglect to the local authority Children's Social Care as required and support staff who make referrals to the local authority Children's Social Care;
- b. to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- c. where a person is dismissed or has left due to risk / harm to a child to the DBS as required and;
- d. where a crime may have been committed to the police as required. **NSPCC – When to call the police** should help the DSL to understand when to consider calling the police and what to expect when working with the police.

3.2 Work with others

- 3.2.1 Act as a source of support, advice, and expertise for all staff;
- 3.2.2 Act as a point of contact with the safeguarding partners;
- 3.2.3 Liaise with the Head to inform him of issues, especially on-going enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of requirements for children to have an Appropriate Adult. A definition of 'Appropriate Adult' can be found at page 4 of this policy. Further information can be found in the statutory guidance – PACE Code C 2019 and also the DfE Guidance: 'Searching, Screening and Confiscation Advice for Schools (2023).
- 3.2.4 As required, liaise with the Case Manager and the DOs at the local authority for child protection concerns (all cases which concern a staff member);



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3.2.5 Liaise with staff, in particular, teachers, pastoral support staff, the medical team, the Head of IT and the Head of Learning Support, on matters of safety and safeguarding (including where safeguarding concerns are linked to mental health and including online and digital safety) when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.

3.2.6 Liaise with the School Counsellor, Head of Wellbeing and medical team where safeguarding concerns are linked to mental health.

3.3 **Raise awareness and provide support**

3.3.1 Promote supportive engagement with parents and / or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;

3.3.2 Ensure that staff are supported during the referral process.

3.3.3 Work with Head and relevant Heads of Sections of the School, taking lead responsibility for promoting educational outcomes by sharing information about welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact these issues might be having on children's attendance, engagement, and achievement at school. This includes:

- a. ensuring that staff know if a child has or has had a social worker, understanding the child's academic progress and attainment and maintain a culture of high aspirations for such children and;
- b. support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on the educational outcomes of those children.

3.3.4 The DSL should ensure each member of staff has access to, and understands this Policy and procedures, especially new and part-time staff.

3.3.5 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.

3.3.6 Ensure this Policy is available publicly and 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.

3.3.7 Support teaching staff to provide additional academic support or reasonable adjustments to children who have or have had a social worker to help them reach their potential, recognising that even



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when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

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

3.4 Information sharing and managing the child protection file

- 1.1.1 The DSL is responsible for ensuring that child protection files are kept up to date, confidential and stored securely.

- 3.4.1 Where children leave the School, ensure their child protection file is copied for any new school or college as soon as possible and within 5 days for an in-year transfer or within 5 days of the start of a new term. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.
- 3.4.2 Additionally, the DSL will consider if it is appropriate to share any information with the new school in advance of a child leaving to help them put in place the right support to safeguard a child and help the child to thrive. For example, information that would allow the new school to continue supporting children who have had a social worker or been victims of abuse and have that support in place for when the child arrives.
- 3.4.3 Upon receipt of a child protection file, the DSL will ensure that key staff are aware as necessary, including the Head of Learning Support.
- 3.4.4 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.

3.5 Prevent

- 3.5.1 In accordance with the Prevent Duty Guidance for England and Wales (2023) and Channel duty guidance: protecting people susceptible to radicalisation (2023) 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;



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- 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.

3.6 Training, knowledge, and skills

3.6.1 The DSL and the DDSL(s) have undertaken training to provide them with the knowledge and skills required to conduct the role. This training should be updated at least every two years and include Prevent awareness. Training should provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly Children's Social Care so they:

- a. understand the assessment process for providing early help and statutory intervention, including local authority Children's Social Care referral arrangements;
- 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. understand the importance of the role of DSL in providing information and support to Children's Social Care in order to safeguard and promote the welfare of children;
- d. understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- e. are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- f. understands the importance of information sharing, both within the School, and with the safeguarding partnerships, other agencies, other agencies, organisations, and practitioners;
- g. understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice



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and support to staff on protecting children from the risk of radicalisation;

- h. obtain access to resources and attend any relevant or refresher training courses;
- i. are able to understand the unique risks associated with online safety and be confident they have the relevant, up-to-date capability required to assist with keeping children safe whilst online at school.
- j. recognise the additional risks children with special educational needs 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.
- k. 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.
- l. are able to take lead responsibility for pupils who are looked after children.

3.7 **Looked after children**

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

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

3.8 **Pupils who have a social worker**

3.8.1 Be aware of pupils who have a social worker.

3.9 **Understanding the views of children**

3.9.1 It is important that children feel heard and understood. Therefore, the DSL and DDSLs will be supported in developing their knowledge and skills to:

- a. encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School puts in place to protect them and;
- b. understand the difficulties children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.



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3.10 Holding and sharing information

3.10.1 Recording, holding, using, and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE 2023. The DSL will be equipped to:

- a. understand the importance of sharing information within the School and with other schools on transfer, including in-year transfers, and with the safeguarding partners, other agencies, and practitioners;
- b. understand the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the GDPR and the DfE's guidance: 'Data Protection in Schools' (February 2023).
- c. be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA Children's Social Care or the Prevent programme etc.



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Appendix 2 Forms of abuse, exploitation and specific safeguarding issues

1. Types of abuse

- 1.1. Part one of KCSIE 2024 defines the following types of abuse. However, staff should be aware that abuse, neglect, exploitation 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. Staff should always be vigilant and raise any concerns with the DSL / DDSLs.

2. Definitions of abuse and neglect

- 2.1. all staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children can abuse their peers online. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images / video, especially around chat groups, and the sharing of abusive images / video and pornography, to those who do not want to receive such content.
- 2.2. **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. Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an 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.
- 2.3. **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.
- 2.4. **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 and prejudice based or discriminatory 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.



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2.5. **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 can take place online, and technology can be used to facilitate offline abuse. 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 (also known as child-on-child abuse) in education and all staff should be aware of it. The School's procedures can be found at paragraph 31 and Appendix 4.

2.6. **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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3. Signs of abuse

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

- 3.1.1. the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference;
- 3.1.2. 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;
- 3.1.3. 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;
- 3.1.4. the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- 3.1.5. the pupil's development is delayed; the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;
- 3.1.6. the pupil appears neglected, e.g., dirty, hungry, inadequately clothed;
- 3.1.7. the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers; and



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3.1.8. 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.

3.1.9. Mental health problems can also be a sign of abuse, neglect, or exploitation.

3.1.10. 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.

4. Specific safeguarding issues

4.1. Statutory guidance acknowledges the following as specific safeguarding issues:

4.1.1. child-on-child abuse (see paragraphs 31 and 6.5 below, and Appendix 4);

4.1.2. children absent from education (see paragraph 4.3 below);

4.1.3. children and the court system;

4.1.4. Child abduction and community safety issues;

4.1.5. children with family members in prison;

4.1.6. child criminal exploitation and child sexual exploitation (see paragraph 4.5 below);

4.1.7. county lines or other gang activities (see paragraph 4.7 below);

4.1.8. cybercrime (see paragraph 5 below);

4.1.9. domestic abuse (see paragraph 6.11 below);

4.1.10. children who are LGBTQ+ (see paragraph 6.10 below);

4.1.11. homelessness;

4.1.12. so called 'honour based' abuse including Female Genital Mutilation (FGM) and forced marriage (see paragraph 6, below);

4.1.13. serious violence (see paragraph 4.7 below);

4.1.14. mental health (see paragraph 6.9 below);

4.1.15. upskirting (see paragraph 6.9 below);



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4.1.16. preventing radicalisation (see section 6.4 below);

4.1.17. modern slavery and the national referral mechanism;

4.2. Further advice and links to guidance on these specific safeguarding issues can be found in Annex B of KCSIE 2024. Staff should be particularly aware of the safeguarding issues set out below.

4.3. Children absent from education policy

4.3.1. Children being absent from education, for prolonged periods and / or on repeat occasions, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation - particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of so called 'honour-based' abuse (including FGM and Forced Marriage). Staff must follow the School's procedures for dealing with children who are absent, particularly on repeat occasions.

4.3.2. The School has procedures in place to respond to unexplained and / or persistently absent pupils and children missing education, to support identifying such abuse, and in the case of absent pupils, help prevent the risk of them becoming a child missing from education in the future. This includes where problems are first emerging but also where children are already known to local authority Children's Social Care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. The School's procedures for children absent from education is as follows:

4.3.2.1. School attendance registers are carefully monitored to identify any trends. If any absence from school gives rise to a safeguarding concern about their welfare, action should be taken in accordance with this Policy.

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

4.3.2.3. 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).

4.3.3. This will assist the local authority to:

4.3.3.1. fulfil its duty to identify children of compulsory school age who are missing from education; and



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4.3.3.2. 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 or involvement with serious crime.

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

4.3.4.1. fails to attend School regularly; or

4.3.4.2. 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).

4.4. Elective Home Education (EHE)

4.4.1. Where a parent expresses their intention to remove a pupil from school with a view to home educating at home, the School will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable and / or has a social worker. Where a child has an Education, Health and Care Plan the local authority will need to review the plan, working closely with parents and carers. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs.

4.5. Exploitation

4.5.1. Exploitation in relation to children refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical and mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimisation, oppression or ill-treatment. Staff are aware that there are several types of child-exploitation, including, but not limited to:

4.5.1.1. **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power or status. It can involve contact or non-contact activities and can occur without a child's immediate recognition; this is due to their grooming by the abuser.

4.5.1.2. **Child Labour Exploitation:** this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential and dignity.

4.5.1.3. **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.



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- 4.5.1.4. **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.
- 4.5.2. Both CSE and CCE are forms of abuse. It occurs where an individual or a group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity:
- 4.5.2.1. In exchange for something the victim needs or wants (e.g.: money, gifts, or affection) and / or;
 - 4.5.2.2. For the financial advantage or increased power, status of the perpetrator or facilitator;
 - 4.5.2.3. Through violence or threat of violence to victims (or their families).
- 4.5.3. Children can be exploited by adult males or females, as individuals or in groups. They may be exploited by other children who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.
- 4.5.4. CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- 4.5.5. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g.: through others copying videos or images they have created on social media).
- 4.5.6. CCE can include children being coerced into moving drugs or money across the county (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- 4.5.7. Some of the following can be indicators of both CSE and CCE, including children who:
- a. go missing (from school or home) or regularly return home late;
 - b. suffer from changes in emotional wellbeing;
 - c. regularly miss school or do not take part in education;
 - d. suffer from sexually transmitted diseases or become pregnant;
 - e. demonstrate changes in emotional wellbeing;
 - f. misuse drugs and alcohol;



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- g. appear with unexplained gifts, money, or new possessions;
- h. associate with other young people involved in exploitation;
- i. have been the victim, perpetrator or alleged perpetrator of serious violence (e.g.: knife crime).

4.5.8. Children who have been exploited will need additional support to maintain them in education.

4.5.9. The victim may have been exploited even if the activity appears to be consensual.

4.5.10. Some additional specific indicators that may be present in CSE are children who:

4.5.10.1. have older boyfriends or girlfriends;

4.5.10.2. suffer from sexually transmitted diseases or become pregnant.

4.5.11. **Reporting CSE:** In line with the advice from the HSCP, in addition to the usual child protection reporting concerns, if the School has a specific concern about child sexual exploitation, they will contact Hertfordshire Children's Social Care department and also 'Operation Halo', telephone number 101. In non-urgent cases of CSE, the School will email the 'Halo' team at Hertfordshire Police on: hqsafeguarding@herts.pnn.police.uk.

4.6. County lines

4.6.1. County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs within the UK using dedicated mobile phone lines or other forms of 'deal lines'. Children and vulnerable adults are used to move, store, and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure the compliance of victims. Children can be targeted and recruited in county lines in a number of locations including any type of school.

4.6.2. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county line gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.



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4.6.3. A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE 2024) may also be applicable to children involved in county lines.

4.6.4. Additional reporting duties:

- a. if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation;
- b. if trafficking is suspected, a referral to the National Referral Mechanism should be considered.

4.7. Serious violence

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

- 4.7.1.1. Increased absence from school;
- 4.7.1.2. A change in friendships or relationships with older individuals or groups;
- 4.7.1.3. Significant decline in performance;
- 4.7.1.4. Signs of self-harm or a significant change in wellbeing;
- 4.7.1.5. Signs of assault or unexplained injuries.

4.7.2. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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



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5. **Cyber-crime**

5.1. Cyber-crime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but enabled at scale and speed online e.g.: fraud, purchasing of illegal drugs, child sex abuse and exploitation) or 'cyber-dependant' crime (crimes that can only be committed by using a computer).

5.2. Cyber-dependant crime include:

- 5.2.1. unauthorised access to computers (illegal hacking) e.g.: accessing a school's computer network to look for test papers or change grades awarded;
- 5.2.2. Denial of Service attacks or 'booting' attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic;
- 5.2.3. Making, supplying or obtaining malware e.g.: viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.

5.3. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependant crime.

5.4. The DSL / DDSL should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependant offences and divert them to a more positive use of their skills and interests.

6. **So-called 'honour-based' abuse (including FGM and forced marriage)**

- 6.1.1. 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. Abuse committed in the context of preserving 'honour' often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.



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- 6.1.2. If appropriate, the DSL will activate local safeguarding procedures using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

6.2. Female Genital Mutilation (FGM)

- 6.2.1. FGM is a form of honour-based violence. It 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.
- 6.2.2. 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](#) 2020 (pages 61-63 focus on the role of schools).
- 6.2.3. 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.
- 6.2.4. 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](#) 2020 for further details about the duty.
- 6.2.5. Guidance published by the [Department for Health](#) provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents, and teaching about FGM.

6.3. Forced marriage

- 6.3.1. Forced marriage is also a form of HBA. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent



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(if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

6.3.2. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the *Multi-agency guidelines: Handling cases of forced marriage*. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk. Staff should speak to the DSL if they have any concerns.

6.4. Radicalisation and the Prevent duty

- 6.4.1. The School has a legal duty to have due regard to the need to prevent people from becoming involved with or supporting terrorism. Children may be susceptible to extremist ideology and radicalisation into terrorism. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Protecting children from this risk is part of the School's safeguarding approach.
- 6.4.2. 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.
- 6.4.3. 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."*



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Radicalisation: *"the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."*

Terrorism: *'an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause.'*

- 6.4.4. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- 6.4.5. 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. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL making a referral to the Police of Channel.
- 6.4.6. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel duty guidance: protecting people susceptible to radicalisation (HM Government, February 2023).
- 6.4.7. 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.
- 6.4.8. Advice and support about extremism (including the Channel Programme) is available from Hertfordshire Police (details at page 8 of this policy: key external contacts).

6.5. Child-on-child abuse

- 6.5.1. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online. The School's policy and procedures on child-on-child abuse can be found in Appendix 4.



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6.6. Online Safety

- 6.6.1. All staff should be aware that technology plays a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face-to-face. In many cases abuse will take place concurrently via online channels and in daily life.
- 6.6.2. The school understands that it is essential that children are protected from potentially harmful and inappropriate online materials. An effective, whole-school approach to online safety empowers a school to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- 6.6.3. The breadth of issues classified within online safety is considerable but can be classified into four risk areas:
 - 6.6.3.1. **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
 - 6.6.3.2. **Contact:** being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - 6.6.3.3. **Conduct:** personal online behaviour increases the likelihood of, or causes, harm: for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying; and
 - 6.6.3.4. **Commerce:** risks such as online gambling, inappropriate advertising, phishing and / or financial scams.

6.7. Sharing nude and semi-nude images and videos

- 6.7.1. Consensual and non-consensual sharing of nudes or semi-nude images and / or videos can be signs that children are at risk.
- 6.7.2. 'Sharing nudes or semi-nudes' means the taking and sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This includes pseudo- images, which are computer generated images that otherwise appear to be a photo or video. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, e.g., via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery. The School treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.



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- 6.7.3. Staff should not view any nude or semi-nude images reported to them, or copy, print or share, store or save the image, or ask a pupil to share or download it under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them. If a member of staff has already viewed the imagery by accident, they must report this to the DSL.
- 6.7.4. The DSL may, in exceptional circumstances, view images with the prior consent of the Head and only where:
 - 6.7.4.1. this is the only way to determine whether to involve other agencies due to lack of information about its content;
 - 6.7.4.2. it is necessary to report the image to a website or agency to have it taken down or support the pupil or parents in making a report; or
 - 6.7.4.3. a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the School's devices or network.
- 6.7.5. Where viewing an image unavoidable:
 - 6.7.5.1. viewing should take place on School premises wherever possible;
 - 6.7.5.2. 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);
 - 6.7.5.3. 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;
 - 6.7.5.4. 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;
 - 6.7.5.5. Any member of staff who views an indecent image should be given appropriate support.
- 6.7.6. 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.
- 6.7.7. 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.



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- 6.7.8. 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.
- 6.7.9. 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).
- 6.7.10. 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.
- 6.7.11. The UK Council for Child Internet Safety's Note Sharing nudes and semi-nudes: advice for education settings working with children and young people (2020) contains details of support agencies and provides further information for schools on how to respond to incidents of sexting.
- 6.7.12. 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/>
- 6.7.13. Advice for parents is available at:
- <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/>
- 6.7.14. The Home Office has published Indecent images of children: guidance for young people (2019) to help young people understand the law on indecent images of children and how to navigate the internet confidently and safely within legal boundaries.

6.8. Upskirting

- 6.8.1. **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. Anyone of any gender can be a victim.
- 6.8.2. Upskirting is a criminal offence and attempting to commit an act of upskirting may also amount to criminal offence if there was a clear intention to commit the act, but it failed for some reason.



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- 6.8.3. 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.
- 6.8.4. 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 sharing images. Sharing nude and semi-nude images and videos (see paragraph 6.7, above).

6.9. Mental Health

- 6.9.1. 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 aims to prevent health problems by promoting well-being and resilience as well as raising awareness of and eliminating the stigma attached to mental illness as part of a whole-school response to the social and emotional wellbeing of pupils. Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.
- 6.9.2. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL / DDSL.
- 6.9.3. The School recognises that if a child has previously had or currently has a social worker it is an indicator that the child is more at risk of mental health issues than most pupils. Equally, the child may be more at risk of mental health issues just prior to the point when a social worker is involved in their care. This may mean that they are more vulnerable to further harm, as well as facing educational barriers relating to attendance, And progress, as well as impacting their behaviour.
- 6.9.4. The DSL is the School's Mental Health Lead. 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.
- 6.9.5. The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.
- 6.9.6. The following websites provide useful advice for parents and pupils:

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



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

6.9.7. Any mental health or wellbeing concern will necessitate immediate action if it is also a safeguarding concern. It is logged on MyConcern and this can be done by any member of staff. This concern is then triaged through the safeguarding team, including the DSL / Mental Health Lead, the School Counsellor, and Head of Wellbeing. Once a need for steps to be taken is identified, early help will be implemented, calling upon outside agencies where necessary.

6.10. Children who are lesbian, gay, bisexual or gender- questioning (LGBTQ+)

6.10.1. A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

6.10.2. When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupil's individual needs, in partnership with the parents (other than in exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in KCSIE) the draft DfE guidance for schools and colleges in relation to Gender Questioning Children when deciding how to proceed.

6.10.3. Risks can be compounded when children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

6.11. Domestic Abuse

6.11.1. The statutory definition of domestic violence is based on the previous cross-government definition; it 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 or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial, or emotional abuse and economic abuse and coercive and controlling behaviour. The Domestic Abuse Act 2021 now recognises the impact of domestic abuse on children, as victims in their own right, if they see hear or experience the effects of abuse.



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6.11.2. 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.

6.11.3. Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found at Annex B of KCSIE 2024. This includes details of Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

6.11.4. Helplines:

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

6.11.5. 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/>

6.12 Special educational needs and disabilities or physical health issues

6.12.1 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.

6.12.2 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. These children are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. The School is mindful in particular that:

6.12.2.1 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;

6.12.2.2 pupils with a special education need, disability or health condition may be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;



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6.12.2.3 some pupils may be unable to understand the difference between fact and fiction in online content and can repeat the content / behaviour in school without understanding the consequences; and

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

6.12.3 The School will consider extra pastoral support and attention for these pupils, including in its boarding houses, along with ensuring any appropriate support communication is in place.

7 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

8 Looked after children and previously looked after children

8.1 The DSL has the skills, knowledge and understanding to ensure that looked after children are kept safe and that the relevant staff have the information they need in relation to a child.



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Appendix 3 Concerns about a child - guidance for staff Receiving a disclosure

1. Receiving a disclosure

- 1.1. Listen carefully to the child and keep an open mind. Do not take a decision as to whether the abuse has taken place;
 - 1.1.2 Do not ask leading questions, i.e., a question which suggests its own answer. Use 'tell me, explain to me, describe to me' (TED) questioning.
 - 1.1.3 Reassure the child they are being taken seriously and that they will be supported and kept safe;
 - 1.1.4 Do not give a guarantee of absolute confidentiality. Staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken. This will involve professional judgment but where doubt exists, the information must be passed on in accordance with this policy;
 - 1.1.5 Staff must keep a sufficient written record of the conversation completed at the earliest possible time (see 2, below).
- 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 2, 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, using The School's safeguarding system, 'MyConcern'.
- 2.2 Records should be factual and signed and dated on MyConcern, 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 a clear and comprehensive summary of the event / concern / conversation;
 - 2.2.4 details of how the concern was followed up and resolved;
 - 2.2.5 the action taken and by whom with reasons for decisions made and the outcome;
 - 2.2.4 the name and position of the person making the record.
- 2.3 The School has a child protection logging system on MyConcern which should be used when reporting matters in accordance with this Policy. Staff



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without internet access must report in person immediately to the DSL / DDSL, or their line manager who will support them in reporting their concern. The formal written record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

- 2.4 Where the allegation is made by an adult, the DSL will ask for a written and signed statement from that person and inform them that their evidence may be passed to a third party. If, after due consideration, the DSL decides to pass the information to an outside agency in accordance with this policy, the DSL will contact the disclosing party (unless the DSL is advised otherwise by that agency) to inform them of this and that they should expect further contact from the agency.

3 Use of reasonable force

- 3.1 There are exceptional circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed.
- 3.2 Staff should refer to the School's Behaviour and Discipline policy and the Staff code of Conduct for more detailed guidance on the use of reasonable force.



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Appendix 4 Dealing with allegations of child-on-child abuse

1. Victims will be reassured that they will be taken seriously, supported, and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim will ever be made to feel ashamed for making a report.
2. The School understands that children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and / or outside school and / or online and that it can impact their progress at school. This includes, but is not limited to:
 - 2.1. Bullying, including cyber-bullying and prejudice-based and discriminatory bullying;
 - 2.2. Abuse within intimate personal relationships between children (teenage relationship abuse);
 - 2.3. Physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);
 - 2.4. Sexual violence such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts, or genitalia under or over clothes, flicking bra, unwanted kisses or embraces) possibly with an online element which facilitates, threatens and / or encourages physical violence;
 - 2.5. Sexual harassment such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - 2.6. Causing someone to engage in sexual activity without their consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third-party;
 - 2.7. Consensual and non-consensual sharing of nude and semi-nude images (also known as 'sexting' or 'youth produced sexual imagery') means the taking and sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop;
 - 2.8. Upskirting, typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
 - 2.9. Initiation / hazing type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element.



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3. The School's approach to child-on-child abuse

- 3.1. Such behaviour is never acceptable and should be considered a safeguarding issue. In accordance with the DfE's advice: Behaviour in schools: advice for headteachers and school staff, 2022, The School can sanction pupils whose conduct falls below the standard which could reasonably be expected of them. Child-on-child abuse can result in disciplinary measures being imposed by the School.
- 3.2. The School is committed to the prevention, early identification, and appropriate management of child-on-child abuse as defined above. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as 'banter', 'having a laugh' or 'part of growing up' can lead to a culture of unacceptable behaviours, an unsafe environment for children and at its worst, to a culture that normalises abuse.
- 3.3. The School recognises that, even if it has no reported cases of child-on-child abuse, it does not mean it is not happening, it may be the case that abuse is not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL / DDSL.
- 3.4. The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:
 - 3.4.1. Educating the whole-school community about this issue and how to prevent, identify and respond to it;
 - 3.4.2. Emphasising the importance of all staff taking all forms of child-on-child abuse seriously, no matter how 'low level' they may appear. No form of child-on-child abuse is ever dismissed as horseplay or teasing;
 - 3.4.3. Ensuring that children feel confident in raising their concerns with relevant staff; this could be their form tutor, Head of Section, DSL or School Counsellor, or any other staff member who they feel comfortable with. Assemblies will take place to remind pupils of whom they can talk to, and posters are displayed to promote this around the school.
 - 3.4.4. Educating pupils about online safety and social media, including how to encourage children to use social media in a positive, responsible, and safe way, and how to enable them to identify and manage abusive behaviour online;
 - 3.4.5. Working with the whole-school community to address equality issues, promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;
 - 3.4.6. Ensuring that all child-on-child abuse issues are fed back to the DSL so that they can spot and address any concerning trends and identify pupils who might need additional support.



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3.5. All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses, or hears of abuse of any form between pupils is asked to report it in accordance with this policy and the School's Behaviour and Discipline policy and Anti-bullying policy so that appropriate action can be taken. Staff should not wait for a child to make a disclosure; they should act on any concern immediately.

3.6. Appropriate action will involve supporting all members of the School community who may be involved as a priority. This may necessitate investigation by the School or other agencies. Until investigations have been completed and findings made, the School will proceed on the basis that the allegations may or may not be true and undertake a careful risk assessment of the welfare of those involved to determine how to best manage the situation. This should be undertaken whether the incident is alleged to have occurred at school, or when the pupil involved was under the School's care. Disciplinary action will follow separately, if appropriate.

4. Sexual violence and sexual harassment (SVSH)

4.1. Where misconduct may constitute sexual violence (rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and dealt with under this policy. SVSH is never acceptable.

4.2. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely it will be perpetrated by boys.

4.3. The School recognises that LGBTQ+ and SEND pupils may be at greater risk of sexual violence or sexual harassment.

4.4. SVSH can occur between two or more children of any age from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. SVSH occurs on a continuum and may overlap. It is important to address any inappropriate behaviour, even if it seems innocuous. This can help prevent problematic or inappropriate behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims, and encouraging them and others to speak out, facilitating targeted support for those demonstrating harmful sexual behaviour.

4.5. It is recognised by the School that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. Children are likely to report such matters, if at all, to people that they trust. All staff are therefore trained to identify signs of abuse and respond to a report.

5. Management of allegations of child-on-child SVSH

5.1.1. **The initial Report** The School recognises that it is not easy for a child to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them, and to respond to all reports of abuse,



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however, they are reported and whether they are made by the victims directly or by third parties.

5.1.2. The initial response to a report is incredibly important. How the School responds can encourage or undermine the confidence of future victims of SVSH to report. Not recognising or downplaying some behaviours can lead to a culture of unacceptable behaviour. Staff are trained in how to receive a report. Where possible, they should be accompanied by the DSL or another member of staff.

5.1.3. They should:

- 5.1.3.1. Listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;
- 5.1.3.2. Where possible, ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;
- 5.1.3.3. Where there is an online element, consider the searching, screening, and / or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration for staff is not to view or forward illegal images of a child;
- 5.1.3.4. Explain the next steps and how the report will be progressed;
- 5.1.3.5. Make a record of the report (recording the facts as the child has presented them) using MyConcern and;
- 5.1.3.6. Inform the DSL (or deputy) as soon as possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

5.2. DSL's considerations

5.2.1. Reports of SVSH are often complex and further disclosures may follow. Facts may be difficult to establish. Decisions need to be made on a case-by-case basis taking all the circumstances into account, in the best interests of the pupils involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE.

5.3. School's considerations

5.3.1. The School will consider:

- 5.3.1.1. the victim's wishes in terms of how they want to proceed. Victims should be given as much control as possible over decisions made about investigation and support, but their wishes will not always be



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determinative as the School may have to take action to protect other children;

5.3.1.2. the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour has been displayed;

5.3.1.3. The ages and developmental stages of the children involved and any imbalance between them;

5.3.1.4. If there is an intimate personal relationship between the children;

5.3.1.5. Whether there are any ongoing risks to those involved;

5.3.1.6. The time and location of any incident, and any action required to make the location safer; and

5.3.1.7. The wider context.

5.3.2. Before deciding how best to support and protect those involved, this will involve:

5.3.2.1. Carrying out immediate risk assessments – these will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve exclusion pending investigation. Risk assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

5.3.2.2. Considering what, if any, further action is appropriate such as involvement of Police and / or other agencies. The School will make a proportionate response to these matters in light of the circumstances and the factors identified above.

5.3.3. The School will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

6. Investigations and findings

6.1. The School will record the findings of investigations undertaken by the police and or the CPS, and if the police decide not to take any further action, will consider whether any investigation should be undertaken or commissioned by the School to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances where this is not appropriate, as it may prejudice a possible future



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investigation, for example, if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions, and reasons for these should be recorded.

- 6.2. The School should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and / or harmful sexual behaviours identified, or the victim where concerns were found to be deliberately invented or malicious.



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Appendix 5 Raising allegations and low-level concerns: the School's procedures

- 1 The School fosters an open and transparent culture in which all concerns about adults are dealt with promptly, responsibly and with the right person. The School recognises the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way which is consistent with the School's values, culture and expected standards of behaviour. Concerns may arise in several ways and from a number of sources. The School trains staff to remain 'professionally curious' with regard to low-level concerns, and stresses the importance of reporting such concerns to the Headmaster. The purpose of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the School.
- 2 By doing this, the School aims to identify concerning or inappropriate behaviour early in order to minimise the risk of abuse, support all those affected and inform members of staff of any behaviour which could be deemed inappropriate or crossing professional boundaries so that they can reflect on and learn from this.
- 3 **Other adults**
 - 3.1 Although this policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it. Should concerns be raised about people who are not Staff or pupils, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.
- 4 **What needs to be reported?**
 - 4.1 All concerns must be raised whether they are considered to be 'low level' concerns or conduct which may meet the harm threshold.
 - 4.2 The School has procedures for dealing with two levels of allegations made / concerns raised about staff. These cover:
 - 4.2.1 Allegations / concerns that do not meet the harm threshold: 'low level concerns';
 - 4.2.2 Allegations that may meet the harms threshold.
- 5 **Key staff duties**
 - 5.1 **Staff behaviour:** all staff must comply with the Staff code of Conduct which sets out appropriate and expected standards of behaviour.
 - 5.2 **Duty to report:** all staff must immediately follow this policy to report any concerns they have about the conduct of a member of staff or any other adult. This includes any concern however it arises, for example behaviour staff may have witnessed, a concern raised by a colleague, pupil, parent, or



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another adult, or as a result of checks or information brought to your attention.

5.3 **Duty to self-refer:** staff must refer themselves to the Headmaster where, for example, they have found themselves in a situation which could be misinterpreted, which might appear compromising to others and / or on reflection the staff member believes they have behaved in such a way that may fall below the standards expected of them.

5.4 **A culture of sharing:** All staff have an obligation to support the School's culture of openness and sharing without fear of reprisal.

6 Low level concerns

6.1 A 'low level concern' is any concern, no matter how small and even if no more than a sense of unease or a 'nagging doubt' that a member of staff may have acted in a way which is:

6.1.1 inconsistent with expected professional standards and / or the Staff Code of Conduct, whether inside or outside of work. No concern is too small or too minor to raise under this policy.

6.1.2 Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

7 Concerns that meet the harm threshold

7.1 Allegations that may meet the harm threshold are those that might indicate a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example, where the individual has behaved:

7.1.1 in a way that has harmed a child, or may have harmed a child; and / or;

7.1.2 possibly committed a criminal offence against or related to a child; and / or;

7.1.3 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. This includes behaviour that may have happened outside school and creates a transferable risk.

8 Definition of harm

8.1 It is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm, but to



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assist in the understanding of what may amount to harm, staff should consider the following:

8.1.1 The Safeguarding Vulnerable Groups Act 2006, whilst not providing a definition of harm, encourages people to apply a 'normal, everyday meaning.'

8.1.2 The Children Act 1989 defines:

- a. 'harm' as 'ill-treatment or the impairment of ill-health or development [including, for example, impairment suffered from seeing or hearing the ill-treatment of another]';
- b. 'ill-treatment' as including 'sexual abuse and forms of ill-treatment which are not physical';
- c. 'health' as 'physical or mental health'.

9 How to raise concerns and allegations

9.1 Raising low level concerns

9.1.1 Where a member of staff has a low-level concern in respect of any staff member, they must report the matter immediately to the Headmaster

9.2 Duty of the DSL to refer concerns to the Headmaster

9.2.1 The Headmaster remains the ultimate decision-maker in respect of all low-level concerns. Save for in cases involving the Headmaster, the DSL must therefore promptly report any concern raised with them to the Headmaster. Wherever possible, the DSL must speak to the Headmaster in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Headmaster in person about the concern, the DSL must email the Headmaster with a summary of the concern on the same day the concern is raised.

9.3 Concerns about staff

9.3.1 Where a concern is raised about the conduct of a member of staff (other than the Headmaster) that may meet the harm threshold, it must immediately be raised with the Headmaster.



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9.4 **Concerns involving the Headmaster**

9.4.1 Where a member of staff has a concern about the Headmaster, they must report it immediately to the Chair of Governors, Juliette Hodson, without first notifying the Headmaster.

9.5 **Conflicts of interest**

9.5.1 Where there is a conflict of interest in raising a concern with the Headmaster (e.g.: concerns raised in connection with someone who is related to or personally connected to the Headmaster) it must be reported directly to the LADO, without first notifying the Headmaster. Details for the LADO can be found at page 7 of this policy.

9.6 **Concerns involving Governors**

9.6.1 Where a member of staff identifies a concern about a Governor, they must report the matter immediately to the Chair of Governors, who is also the Nominated Safeguarding Governor. If the Chair of Governors is the subject of an allegation, the staff member must report the matter to the other.

9.7 **Reports to the DSL**

9.7.1 If it is not possible for the member of staff to make a report to the Headmaster or the Chair of Governors, they must instead report to the DSL. The DSL will take action in accordance with these procedures and will inform the Headmaster as soon as possible, or, where appropriate, the Chair of Governors.

10 **The School's response to concerns and allegations**

10.1 **Appropriate action**

10.1.1 The School will ensure that appropriate action is taken to address concerns that are raised under this policy.

10.2 **Assessing concerns**

10.2.1 The Headmaster (or, if the concern relates to the Headmaster) the Chair of Governors will determine whether the concerns raised are



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low level or potentially meet the harm threshold. The DSL, The Headmaster and the Chair of Governors have all been trained to assess concerns, and to record and address them appropriately.

10.3 Low level concerns

10.3.1 If the School determines the concern is a low-level concern, then the School will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the School's capability or disciplinary procedures.

10.4 Borderline cases

10.4.1 The Headmaster (or, if the concern relates to the Headmaster, the Chair of Governors) may take advice from the LADO in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial 'no names' conversation with the LADO about whether the harm threshold is met.

10.5 Referral

10.5.1 Where the Headmaster (or, if the concern relates to the Headmaster, the Chair of Governors) considers the concerns raised potentially meet the harm threshold, the Headmaster (or if the concern relates to the Headmaster, the Chair of Governors) will make a report to the LADO before further action is taken. The Headmaster (or if the concern relates to the Head, the Chair of governors) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within **one working day** of the allegation being reported in accordance with this policy.

10.6 Responding to an allegation that may meet the harm threshold

10.6.1 Where an allegation is made that may meet the harm threshold, the School will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so and will keep the LADO informed of the action it is taking.



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10.7 **Case Manager**

10.7.1 Where an investigation is necessary into an allegation of conduct that may meet the harm threshold, a 'Case Manager' will be appointed by the School to lead the investigation. The Case Manager will either be the Headmaster or a person with appropriate authority appointed by the Headmaster. Where the Headmaster is the subject of an allegation, the Case Manager will either be the Chair of Governors.

10.8 The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in The School's safeguarding systems which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harm threshold, it will follow the above procedure and refer the matter to the DO. The rationale for all decisions and actions will be recorded. The School will consider if any wider cultural issues in school enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

11 **Disclosure of information about concerns and allegations**

11.1 **Informing the individual of a concern**

11.1.1 The School will in most cases inform the individual concerned about any low-level concern that is raised about them.

11.2 **Informing the individual of an allegation where appropriate**

11.2.1 The Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

11.3 **Communication and support for the individual subject to an allegation**

11.3.1 If and when it is appropriate to inform the individual of the allegation against them, the Case manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

11.4 **Informing the child's parents / carers where appropriate**



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11.4.1 The Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents of the child / children as the case progresses. 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.

11.5 **Reporting restrictions**

11.5.1 The School is aware of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of an allegation in certain circumstances.

11.6 **Involvement of external agencies**

11.6.1 Where the LADO 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 individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

11.7 **Concerns about supply staff and contractors**

11.7.1 Where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

11.8 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 act in accordance with Part four of KCSIE and the School's employment procedures.

11.9 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.



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12 **Referrals to the Disclosure and Barring Service (DBS) / Teachers' Regulation Authority (TRA)**

- 12.1 The School is under a legal duty to make a referral to the DBS where a member of staff is removed from the School from working in a regulated activity (whether paid or unpaid) or has resigned prior to being removed, because they have harmed, or pose a risk of harm to a child. The DBS will then consider whether to impose sanctions which may restrict or prevent that person from working with children in the future.
- 12.2 Where an allegation relates to a member of supply staff provided by an agency, the agency will be kept fully aware and involved, even though the School takes the allegation to the DO and leads the referral.
- 12.3 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, the School will make a referral to the TRA. The TRA will consider whether to make a prohibition order on that person which prevents them from undertaking teaching work in the future.
- 12.4 Where an allegation is made, an investigation should be conducted to gather enough evidence to establish if it has foundation. Employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance.

13 **Malicious allegations**

- 13.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.
- 13.2 Where a parent has made a deliberately invented or malicious allegation the Headmaster 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.
- 13.3 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.



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14 Record keeping

- 14.1 **Records of low-level concerns:** low level concerns will be recorded in writing and retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. All low-level concerns, including those that have not been addressed formally under the School's procedures, will be stored securely by the DSL. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. The record will set out the name of the individual involved, a brief description of the concern and the context in which it arose, any investigation that has been carried out and the outcome of that investigation. The name of the individual who raised the concern will also be noted. Where that individual wishes to remain anonymous, the School will try to accommodate this as far as reasonably possible but cannot guarantee anonymity in all circumstances.
- 14.2 **Malicious of false low-level concerns and allegations:** details of allegations found to be malicious or false will be removed from the records.
- 14.3 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.
- 14.4 The School will retain all safeguarding records and relevant personnel records indefinitely. The School may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

15 References

- 15.1 **Low level concerns:** will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the School's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.
- 15.2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases where the disciplinary sanction has expired). The School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.



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Appendix 6 Charity safeguarding procedures: charity safeguarding duties

1. As trustees of a charity, the Board of Governors acknowledge that in addition to their statutory duties to safeguard and protect children at risk, they have a duty to take reasonable steps to protect everyone associated with the charity from harm, abuse, or mistreatment.
2. The full extent of these additional safeguarding duties is set out in the Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse, and data breaches.
3. The School's safeguarding and data protection policies, the staff handbook and the Health and Safety Policy set out how many concerns about these issues will be handled. If anyone has any safeguarding concerns which have caused or may cause harm to anyone associated with the charity which are not expressly covered by those policies, they should contact the DSL as soon as possible.
4. The Governors fulfil these duties by:
 - 4.1. Leading by example and promoting a fair, inclusive, and positive culture, ensuring that everyone involved with the School feels able to report any concerns they may have, confident that they will be heard and responded to;
 - 4.2. Regularly reviewing the suitability of policies and procedures as a Board to ensure they remain fit for purpose and are followed in practice;
 - 4.3. Setting appropriate delegation arrangements for the effective governance and management of safeguarding matters within the charity;
 - 4.4. Being quick to respond to concerns, to carry out investigations and take necessary action;
 - 4.5. Being open and transparent and not ignoring harm or downplaying failure;
 - 4.6. Managing conflicts of interest and / or loyalty;
 - 4.7. Ensuring that staff receive training in safeguarding at a level which is commensurate with their role;
 - 4.8. Having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of staff, partner organisations, contractors, and beneficiaries.



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- 4.9. Entering into appropriate agreements with other third parties (whether those who provide services to the Charity or directly to its beneficiaries (including pupils) covering the relationship, their respective roles and monitoring and reporting requirements;
- 4.10. Review its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep people safe;
- 4.11. Making sure suitable reporting and monitoring processes are in place for any work overseas;
- 4.12. Set out risks and how it will manage them in a risk register;
- 4.13. Allocating sufficient funds for the effective management of safeguarding and arranging appropriate insurance cover;
- 4.14. Ensuring a sufficient level of oversight of the charity's operations to manage risk and reporting any incidents which materially affect the charity's operations, finances, people or reputation to the Charity Commission in line with 'How to report a serious incident in your charity (Charity Commission, June 2019).