WOLVERHAMPTON GRAMMAR SCHOOL

SAFEGUARDING POLICY

KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer (LADO)	Kathy Hadley Helen Hayes TEL: 01902 550661 EMAIL: TBC
Multi-Agency Safeguarding Hub (MASH) Team	TEL: 01902 555392 OUT OF HOURS EMERGENCY DUTY TEAM TEL: 01902 552999 EMAIL: mashsecure@secure.wolverhampton.gov.uk
Wolverhampton Safeguarding Services	TEL: 01902 550477 EMAIL: wscb@wolverhampton.gov.uk
Support and Advice about Extremism	**Police** PC Pamy Sandhu, Prevent Officer MOBILE: 07765295937 p.k.sandhu@west-midlands.pnn.police.uk EMERGENCY: 999 NON EMERGENCY NUMBER: 101 **Local Authority** Community Safety Team TEL: 01902 551214 EMAIL: safer@wolverhampton.gov.uk PREVENT LEAD: Debbie Smith **Department for Education** NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk

Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000100 EMAIL: concerns@isi.net

KEY SCHOOL CONTACT DETAILS

Governors	**Chair of Governors** James Sage TEL: 01902 712004 EMAIL: cah@wgs-sch.net **Nominated Safeguarding Governor** Dr Manisha Gowan-Gopal TEL: 01902 712004 EMAIL: cah@wgs-sch.net
Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Lead (DDSL)	**Main DSL for the School** Claudine Jones TEL: 01902 421326 EMAIL: cj@wgs-sch.net **Deputy DSL** Dan Peters TEL: 01902 421326 EMAIL: dlp@wgs-sch.net
Designated Teacher for Looked After Children	Claudine Jones TEL: 01902 421326 EMAIL: cj@wgs-sch.net
Head	Alex Frazer TEL: 01902 421326 EMAIL: atwf@wgs-sch.net

POLICY STATEMENT

This policy applies to Wolverhampton Grammar School. This policy is reviewed and updated annually as a minimum and is available on the School website and Firefly.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2020) ('*KCSIE'*)
- Interim guidance on (first published on 27 March 2020 and updated regularly)
- Disqualification under the Childcare Act 2006 (August 2018)
    - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (2018) ('*WT'*)
    - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (July 2015)
    - The Prevent Duty: Departmental advice for schools and child care providers (June 2015)
    - The use of social media for on-line radicalisation (July 2015)

This policy also takes into account the procedures and practice of Wolverhampton Local Authority as part of the inter-agency safeguarding procedures set up by Wolverhampton Safeguarding Children Together (WSCT)(previously Wolverhampton Safeguarding Children Board (WSCB)).

In event of school closure or partial closure, this policy should be read alongside the School's Safeguarding during Covid-19 Annex which sets out how this policy has been adapted to ensure appropriate regard to KCSIE during this time.

CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. **Safeguarding and promoting the welfare of children is everyone's responsibility. All staff are expected to act if they have a concern.**

Parents are encouraged to raise any concerns directly with the School, if necessary using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing *early help*. The Head, DSL and Deputy DSL meet fortnightly to discuss safeguarding issues; they are assisted by a Safeguarding Team (including all Heads of Year) who have all received advanced safeguarding training (See Appendix 2). The DSL ensures Heads of Year are equipped to coordinate early help and supports them informally as well as through fortnightly Key Stage meetings. All pupils meet with their Form Tutor daily and know they can speak to any member of staff if they have concerns. The school employs a qualified Counsellor, who is made available to pupils via a straightforward referral process see Appendix 3. All pupils are also recommended a dedicated page on Firefly concerning pupil welfare. Here they can contact Claudine Jones (Senior School) or Dan Peters (Junior School) with any worry or concern they may have.

Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as:

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

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). 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 by another child or children. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

PROCEDURES FOR DEALING WITH A CONCERN ABOUT A PUPIL: Act immediately

If staff suspect or hear an allegation or complaint of abuse or neglect from a pupil or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping pupils safe.

Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare, and protect the safety of pupils. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead (DSL).

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the pupil) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in School should report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to a DSL either by submitting an accurate record of the disclosure or concern on CPOMS via Firefly or in person, including the date, time and place of the conversation and detail of what was said and done by whom. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or member of the Safeguarding Team). If they speak to a DSL in person, they will be asked to note details on CPOMS thereafter. During the school holidays, or out of hours, concerns should be raised with the Head, by email. However, any staff member can make a direct referral to the MASH using the contact details above. The DSL will ensure that all concerns, discussions and decisions (together with reasons) made under these procedures will be recorded in writing.

The School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by encouraging them to speak with or email a DSL. Additionally, School can arrange for them to speak with the School Counsellor or any member of staff of their choice. The School operates its processes with the best interests of the pupil at their heart.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between pupils outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of pupils, consider whether environmental factors are present in a pupil's life that are a threat to their safety and/or welfare. The School will share as much information with the MASH team as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early Help

Any pupil may benefit from early help but all staff should be particularly alert to the potential need for early help for a pupil who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitations in a family circumstance presenting challenges for the pupil, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is experiencing, or is at risk of experiencing family ostracism
- Is a privately fostered child.

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.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the Thresholds of Need and Support in Wolverhampton document. The DSL may make a referral to the MASH team and will liaise with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration and the DSL will liaise with the MASH team if the pupil's situation does not appear to be improving.

What staff should do if they have <u>concerns about a pupil</u>

If staff, including governors, agency staff and volunteers have any concerns about a pupil (as opposed to a pupil being in immediate danger), they should either, speak with the School's DSL to agree a course of action, or submit an accurate record of the concern on CPOMS via Firefly. Staff can also make a direct referral to the MASH team. Staff should not assume that somebody else will take action and share information that might be critical in keeping pupils safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a pupil's situation does not appear to be improving, the DSL should press the MASH team for reconsideration. Staff should challenge any inaction and follow this up with the DSL and the MASH team as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on CPOMS.

What staff should do if a pupil is in <u>danger or at risk of harm</u>

If staff, including governors, agency staff and volunteers believe that a pupil is in immediate danger or at risk of harm, they should make an immediate referral to the MASH team and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to

statutory agencies such as the police and the MASH team. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and the MASH team as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on CPOMS.

The School's Local Safeguarding Children Executive is Wolverhampton Safeguarding Children Together (WSCT). A full copy of their local procedures can be found: http://westmidlands.procedures.org.uk/

What staff should do if a pupil is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about pupils who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. If staff have concerns that there is an immediate/significant risk of a pupil being drawn into terrorism they must call 999 or call the MASH team who will provide advice and support as required.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments termly following consultation with the Police of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL and the governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect pupils from being drawn into terrorism and are regularly revised.

What staff should do if they discover an act of Female Genital Mutilation ('FGM')

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve the MASH team as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

What staff should do if they have concerns that pupils are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that pupils are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a pupil (as opposed to a pupil being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to the MASH team.

What staff should do if a pupil goes missing from education

Pupils who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with pupils who go missing from education can be found on the School website and Firefly and will be used for searching for, and if necessary, reporting, any pupil missing from education. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult

particularly when a pupil missing from education is also identified as a welfare and/or safeguarding concern.

The School will report to Wolverhampton Education Services a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

What staff should do if they have concerns about the behaviour of another staff member

If staff have concerns about another staff member (including supply staff and volunteers), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the LADO.

What staff should do it they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised with the Head or the DSL. If they continue to have concerns (or their concerns are in regard to the Head or the DSL) they should raise them in accordance with the School's Whistleblowing Policy. No disciplinary action will be taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC

whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS

Peer on peer abuse is abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, upskirting, sexting, sexual assault and harmful sexual behaviours including sexual violence and sexual harassment. The School recognises the gendered nature of peer on peer abuse (that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh". The School recognises that a pupil is likely to disclose an allegation to someone they trust: this could be **any** member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a positon of trust.

The School recognises that pupils with special educational needs and disabilities can be more prone to peer on peer group isolation than other pupils and will consider extra pastoral support for those pupils. All staff also need to be alert to the specific needs of those pupils who have special educational needs and/or disabilities, including young carers, as well as understanding that SEND pupils may need additional pastoral support and may also be prone to peer-group isolation and be at greater risk of bullying. Those with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with a DSL or recording concerns on CPOMS, as appropriate.

The School's Anti-Bullying Policy and Behaviour Management Policy detail measures taken to minimise the risk of peer on peer abuse.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour Management policies:

- A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the LADO & WSCT on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LADO and/or WSCB, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LADO, WSCT and/or the Police as appropriate.

- Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the Police. If the DSL decides to make a referral to the MASH team and/or a report to the Police against a victim's wishes, the reasons should be explained

to the pupil and appropriate specialist support offered. The School's approach to sexting is detailed in the ICT Acceptable Use for Pupils Policy

- In the event of disclosures about pupil-on-pupil abuse, all pupils involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL team and where appropriate, the School Counsellor and support from external agencies will be sought, as appropriate.

- When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
    - the victim;
    - the alleged perpetrator; and
    - the other pupils (and, if appropriate, staff) at the School.

- In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises and School transport.

PROCEDURES FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, SUPPLY STAFF AND VOLUNTEERS)

The School's procedures for managing allegations against staff (including supply staff and volunteers who are currently working in the School follows Department for Education statutory guidance and WSCT arrangements and applies when staff (including supply staff and volunteers) have (or are alleged to have):

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

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

Concerns including allegations about a staff member should be investigated as a priority to avoid any delay.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the Head. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Directors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Directors and LADO. However, staff may consider discussing any concerns with the DSL and may make any referral via them.

2. The Head should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. Where the Head deems there to be an immediate risk to pupils or there is evidence of a possible criminal offence, they may involve the Police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or the MASH team.

3. The Head will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by the MASH team or the Police. The Head will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

4. The Head should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. They will give due weight to the views of the LADO, WT and *KCSIE* when making a decision about suspension. Where the individual is suspended, the Head will ensure they know who their point of contact is in the School and shall provide them with their contact details.

5. The Head will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from the MASH team or the Police.

6. The Head will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a pupil) who has harmed, or poses a risk of harm, to a pupil, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

7. On conclusion of the case, the Head should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

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

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

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

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

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

STAFF CODE OF CONDUCT

The School's Staff Code of Conduct can be found on the School website and in the Staff Employment Manual. The aim of the Code of Conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer to the School's Staff Code of Conduct and Social Media Policy for clear guidelines.

Staff teaching or dealing with pupils in a one-to-one situation, such as peripatetic music or sport or in individual pastoral situations, should be particularly aware of the need to be able to be seen by others and should not make themselves vulnerable to accusation. The need for staff to safeguard themselves is addressed through the recruitment process and subsequent training and is highlighted in the Staff Code of Conduct.

SAFER RECRUITMENT

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment Selection and Disclosure Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Recruitment Selection and Disclosure Policy.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Claudine Jones who is a member of the Senior Management Team. She has overview of all safeguarding in the School and leads safeguarding in the Senior School. Dan Peters is the DDSL and leads safeguarding in the Junior School. In the absence of either Claudine Jones or Dan Peters, safeguarding concerns must be raised with the Head, who is a fully qualified DSL. This ensures there is the required cover for the role at all times. Key Contacts for these leads are at the start of this policy. Additional members of staff trained to DSL level (The Safeguarding Team) can be found in Appendix 2 and are available during school hours to discuss any safeguarding concerns.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School (including online safety). The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's Safeguarding Policy. Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection information held on CPOMS is downloaded and transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to the MASH team.

The DSL, the Deputy DSL or the Head will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. They can be contacted in person, via telephone or staff can log a concern on CPOMS. For out of hours/out of term activities, staff should log a concern on CPOMS or email the Head directly.

The DSL or Deputy DSL should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. "NPCC - When to call the police" can assist the DSL or Deputy DSL understand when they should consider calling the police and what to expect when they do.

Full details of the DSL's role can be found at Annex B of *KCSIE*.

Whilst the Directors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

TRAINING

Induction and training are in line with advice from WSCT.

All Staff

All new staff will be provided with induction training that includes:

- the Safeguarding Policy;
- the role and identity of the DSLs and DDSLs
- the Behaviour Management Policy
- the Staff Code of Conduct including the School's Whistleblowing Policy and the IT Acceptable Use Policy (Staff and Pupil) & the Social Media Policy
- the safeguarding response to children who go missing from education;
- a copy of Part One of *KCSIE*
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE*.

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are provided with appropriate information.

All staff are also required to:

- Read Part One of *KCSIE* [and Annex A where relevant] and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via INSET or other update training.
- Understand key information contained in Part One of *KCSIE*. The School will ensure staff understanding through the use of the MyOnstream digital platform.
- Receive training in safeguarding and child protection regularly, in line with advice from the WSCT. Training will include online safety and harmful sexual behaviours including peer on peer sexual violence and harassment. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff 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.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, INSET, e-bulletins and staff meetings.

DSLs

The DSLs receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the WSCT approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE.*

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The Head and DDSL are trained to the same level as the DSL, as are other members of The Safeguarding Team as listed in Appendix 2.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Dr Manisha Gowan-Gopal is the Director with responsibility for the safeguarding arrangements in the School.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation which is audited by the Director Lead annually. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching pupils how to keep safe online

The Board of Directors ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help pupils to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety (including when children are online at home) is an integral part of the School's ICT curriculum and also embedded in PSHE and Relationship and Sex Education (RSE).

The School has appropriate filters and monitoring systems in place to safeguard pupils from potentially harmful and inappropriate material online. The School's systems are:

- Smoothwall S10 hardware appliance
- Smoothwall UTM subscription service providing Web Content Filter, Proxy, IPS (Intrusion Prevention System), IDS (Intrusion Detection System) and DPI (Deep Packet Inspection). Daily safeguarding reports and alerts are automatically generated as part of the Smoothwall reporting services.
- Ruckus & Smoothwall via Active Directory provide Radius Accounting for Proxy Authentication
- Smoothwall, GFI, Microsoft and Sophos provide Anti-Spam and Anti-Virus protection.

Such systems aim to reduce the risk of pupils being exposed to illegal, inappropriate and harmful materials online; reduce the risk of pupils being subjected to harmful online interaction with others; and help manage online behaviour that can increase a pupil's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's Anti-Bullying Policy, Behaviour Management Policy and the IT Acceptable Use Policy for Pupils. This also includes detail on the use of mobile technology in School and accessing 3G, 4G and 5G technology on School premises and the School's IT arrangements to ensure that pupils are safe from terrorist and extremist material when accessing the internet through the School's systems.

School staff should remain aware that many pupils have unlimited and unrestricted access to the internet via 3G, 4G and 5G and when pupils are using their devices as part of a classroom activity, pupils are expected to use the School Network. Outside of the classroom, staff should remain vigilant and question any suspicious/concerning behaviour involving a mobile device. Staff should note any concerns on CPOMS or discuss them with the DSL.

Relationships and Sex Education ("RSE")

RSE is compulsory from September 2020 although the School has flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching RSE.

RSE is part of the School's PSHE programme.

Looked after children

The Board of Directors ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Claudine Jones is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting considered appropriate in the circumstances, and may include a DBS check if relevant.

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

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Please also refer to the following policies:

Code of conduct for staff – website, staff employment manual	Anti Bullying Policy - website
Whistleblowing Policy - staff employment manual	Supervision Policy – website
Behaviour Management Policy - website	Equal Opportunity Policy (Pupil) – website, staff network
Complaints Policy - website	IT Acceptable Use Policy (Staff) - staff employment manual
KCSIE (Part 1) and Annex A - website	Social Media Policy (Staff) – staff employment manual
Risk Management Policy- staff network (available on request)	Recruitment Selection and Disclosure Policy - website
Health & Safety Policy – website	IT Acceptable Use Policy (Pupils) - website
Risk Assessment Policy – staff network	Privacy Policy (Pupils and Parents) - website
Taking, Using and Storing Images of Children Policy – website	Missing Child Procedure and Arrangements when a Child is Not Collected - website

Monitoring and Evaluation of this policy

The school monitors and evaluates its Safeguarding Policy and procedures through the following activities:

- Annual Directors' audit and termly review of child protection & safeguarding policy and practice.
- SMT discussion
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Regular review of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school. e.g minibus travel, after hours care, weekend sport provision
- Frequent scrutiny of governing body meeting minutes
- Annual pupil bullying survey
- Regular scrutiny of recruitment procedures
- Logs of bullying/racist behaviour/complaints are reviewed annually by SMT and Directors

Appendices

1. Signs and Types of Abuse
2. The Safeguarding Team of Staff Training to DSL Level
3. Counsellor Referral Procedure
4. What happens if staff have concerns about a child

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Next Review:
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APPENDIX 1 –SIGNS AND TYPES OF ABUSE

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

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

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 (including corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

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

Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying

pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Upskirting: is now a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, 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. Anyone of any gender can be a victim.

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

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. 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. All staff should be aware of the associated risks and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence /violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

• children who appear with unexplained gifts or new possessions

• children who associate with other young people involved in exploitation

• children who suffer from changes in emotional well-being

• children who misuse drugs and alcohol

• children who go missing for periods of time or regularly come home late, and

• children who regularly miss school or education or do not take part in education.

Child sexual exploitation (CSE): CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It 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 and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

• children who have older boyfriends or girlfriends, and

• children who suffer from sexually transmitted infections or become pregnant.

The DfE has published guidance on this entitled Child sexual exploitation: guide for practitioners.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. 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.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Mental health: all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a deputy.

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.

So called 'honour based' abuse : encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.

There is a statutory duty on teachers to personally 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. 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. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not

discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form 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 (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. 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. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is 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. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is 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 is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with 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 judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

Special educational needs and/or disabilities: Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bi or trans (LGBT): Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic Abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who go missing from school: A child going missing from School is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found in the School's Missing Child Procedure. All unexplained absences will be followed up in accordance with this.

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). This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

APPENDIX 2 – THE SAFEGUARDING TEAM OF STAFF TRAINED TO DSL LEVEL:

Alex Frazer - Head

Claudine Jones – DSL [Assistant Head Senior School]

Dan Peters – DDSL [Head Junior School]

Nic Anderson – Deputy Head Senior School

Toby Hughes – Deputy Head Senior School

Rhiannon Clancy – Head of Year

Steve Clancy – Head of Year

Kathy Dyer – Head of Year

Tom Jeavons – Assistant Head of Year

Hattie Povey – Assistant Head of Year

Claire Ray – Head of Year

Zoe Rowley – Senior Librarian

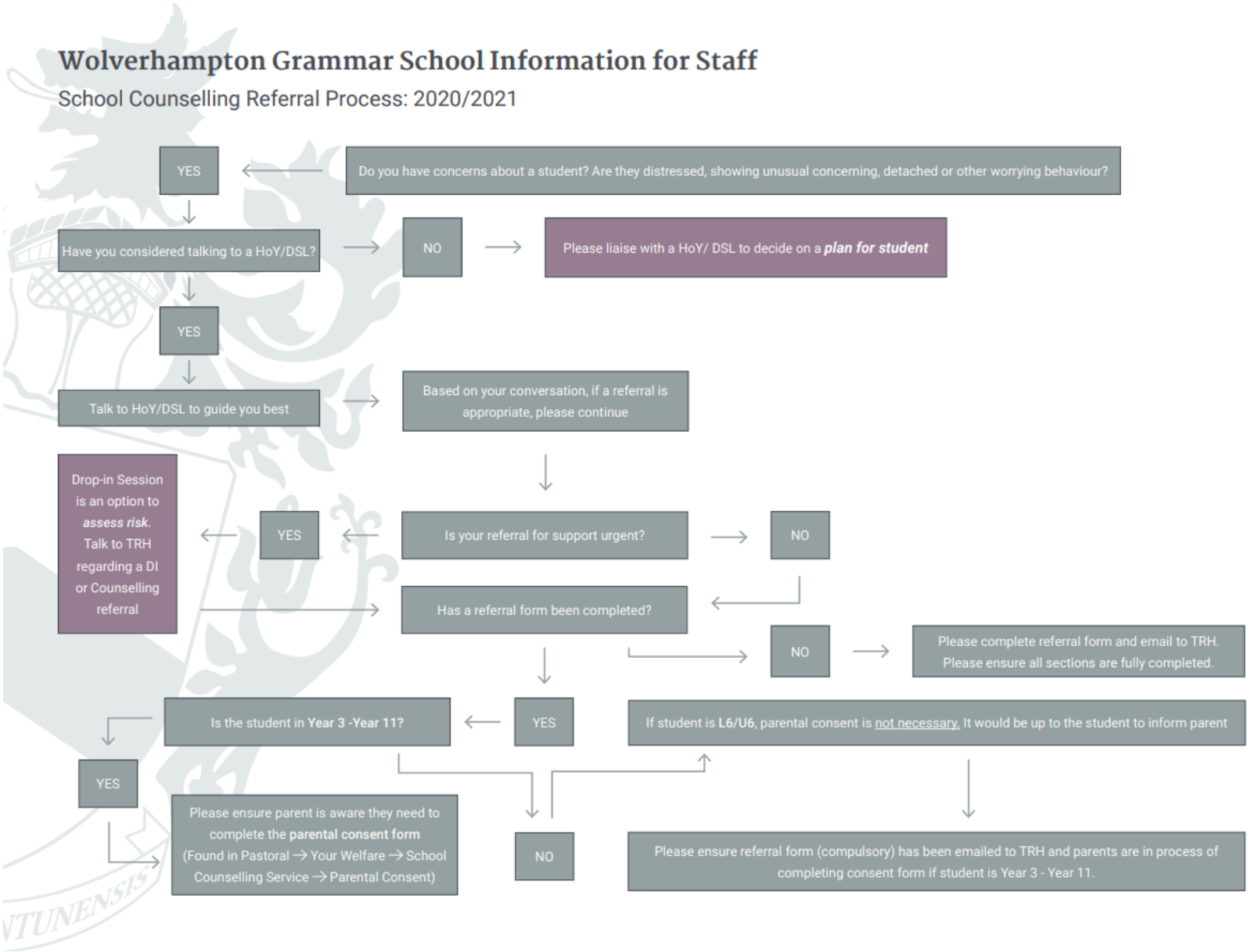
Fran Wainwright – Senior School Teacher

Steve Jackson-Turnbull – Head of Year

Steph Jones – Senior Administrator

Jessica Cooksey - Administrator

APPENDIX 3 – COUNSELLOR REFFERAL PROCEDURE



What happens next?

TRH WILL RECEIVE REFERRAL FORM FROM STAFF AND A COMPLETED PARENTAL CONSENT FORM

SCHOOL COUNSELLOR (BA) WILL RECEIVE BOTH FORMS

- BA TO ALLOCATE COUNSELLING APPOINTMENT TO STUDENT → STUDENT IS SEEN FOR FIRST APPOINTMENT. CONFIDENTIALITY ETC. ALL EXPLAINED

- BA SENDS OUT A FIREFLY APPOINTMENT TASK WITH DETAILS OF ROOM LOCATION ETC. → STUDENT & BA, BASED ON 1ST SESSION, WILL DECIDE IF STUDENT WILL CONTINUE AND IF SO, HOW MANY SESSIONS TO CONTRACT FOR & APPOINTMENT SENT OUT VIA FIREFLY

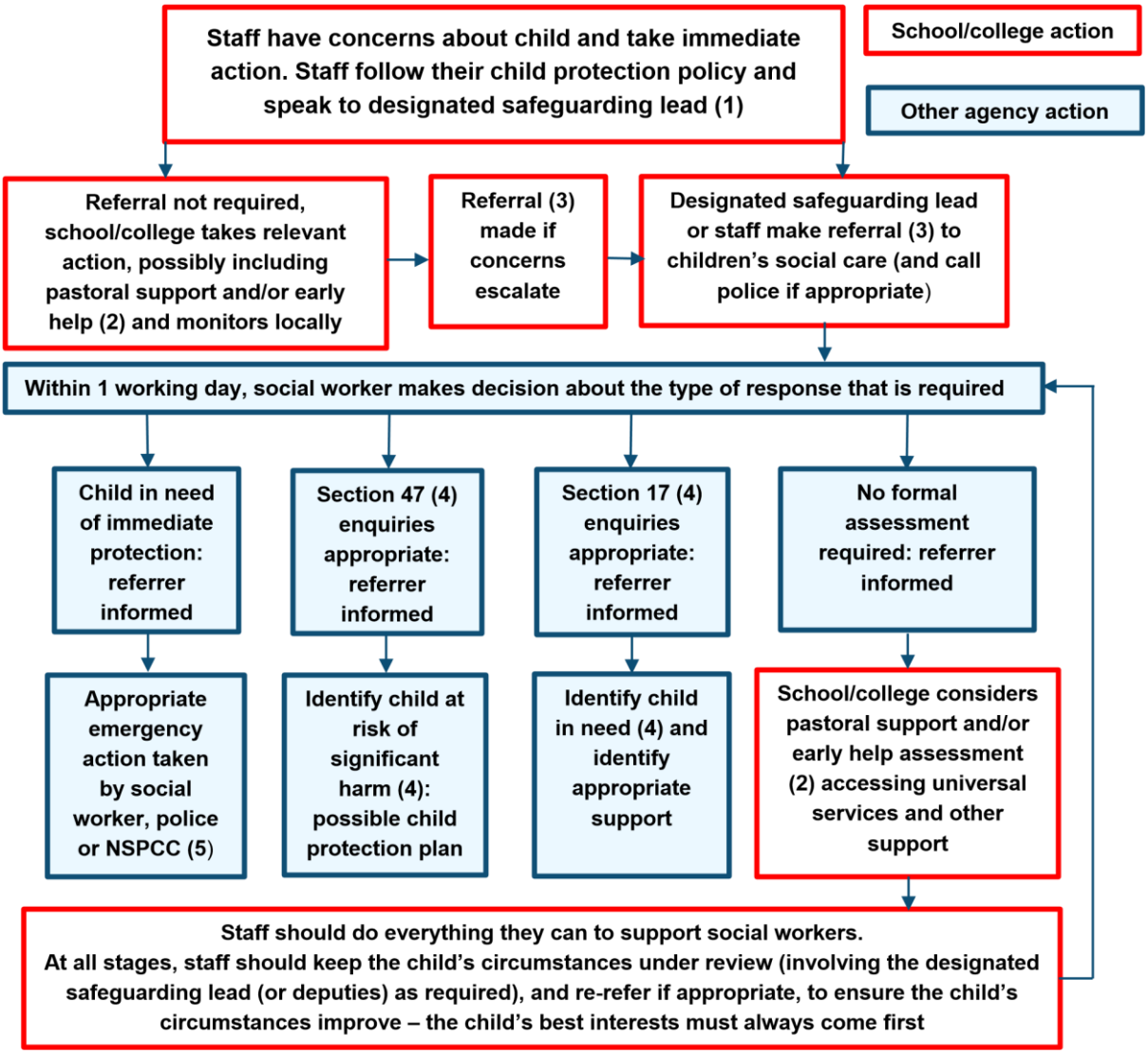
- STUDENT, REFERRER, TRH & PARENT (IF OK TO), WILL BE COPIED INTO THIS APPOINTMENT TASK → IF CONTINUING, NEXT SESSION TIME/DATE BOOKED WITH STUDENT.

  IF NOT CONTINUING/NOT APPROPRIATE FOR COUNSELLING, ALTERNATIVE SUGGESTIONS OF SUPPORT MAY BE DISCUSSED. THIS WILL BE RELAYED BACK TO STUDENT & REFERRER – WITH STUDENT'S PERMISSION.

Counselling Related Information:

Staff are politely requested to not ask the counsellor how the sessions are going. Counsellor can only give limited information (e.g. attendance related, with student's knowledge). It is helpful to remember that 'no news is good news'. The Counsellor will forward any self-harm or risk-related concerns directly to TRH and/or to a DSL staff member. The referrer will then be informed.

Drop-In Session Related Information:

- Drop in sessions are offered as a one-off session, which do not require parental consent.
- Drop in sessions are scheduled, shorter sessions on allocated days, lasting 20 minutes.
- They can help if a student is not sure about being referred for counselling, or if a staff member has some concerns about a student.

APPENDIX 4 – WHAT HAPPENS IF STAFF HAVE CONCERNS ABOUT A CHILD