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2. Purpose and Aim

- 2.1. This policy should be read in conjunction with the policies and procedures for [Safer Recruitment \(Recruitment, Selection, and Disclosure\) policy](#), [Acceptable Use of ICT policy](#), [Whistleblowing policy](#), [Staff Behaviour policy](#), [Abuse of Position of Trust policy](#), and [Anti-bullying policy](#).
- 2.2. Oswestry School's Safeguarding and Child Protection policy aims to provide clear direction to staff, governors and volunteers about expected codes of behaviour in issues of safeguarding and dealing with child protection issues. It also applies to all pupils at the school. The policy also aims to make explicit the school's commitment to the development of good practice and sound procedures. The purpose of the policy is, therefore, to ensure that safeguarding and child protection concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child. The school's systems and processes operate with the **best** interests of the child at their heart.
 - 2.2.1. We recognise our duty both to children in need and children at risk and that

children in need of support often requires help from more than one agency. The school contributes to inter agency work to ensure the safeguarding of children; where appropriate the school would work as part of a multi-agency approach such as Early Help or the use of the Common Assessment Frameworks. In all matters relating to child protection the school will follow the procedures laid down by the appropriate Local Safeguarding Children's Board together with DfE guidance contained in Working Together to Safeguard Children (2015) and Keeping Children Safe in Education (2016).

- 2.2.2. All members of staff and visitors have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy. This includes a duty both to children in need and to children at risk of harm. **All** staff must read and understand Part 1 of KCSIE (September 2016). All school staff should be aware that safeguarding incidents can happen at anytime and anywhere and are required to be alert to any possible concerns - **everyone** is responsible and **everyone** can make a referral.
- 2.2.3. As part of carrying out safe recruitment procedures under KCSIE, members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as peripatetics and sports coaches are subject to the necessary statutory child protection checks before starting work. 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.
- 2.2.4. Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Those undertaking management posts will be subject to prohibition from management of independent schools checks.
- 2.2.5. All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils at school or on another site.
- 2.2.6. Should the school develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.
- 2.2.7. This policy is reviewed by governors annually. Please also refer to the school's Recruitment Policy for further details.
- 2.3. We have also taken into account the following documents:
 - 2.3.1. Revised SSCB procedures 31st March 2017

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- 2.3.2. Working Together to Safeguard Children 2015
 - 2.3.3. Early year and Foundation Stage Guidance 2014
 - 2.3.4. Keeping Children Safe in Education 2016 (and new proposed guidance December 2017)
 - 2.3.5. Prevent Duty Guidance for England and Wales 2015
 - 2.3.6. Section 26 of the Counter-Terrorism and Security Act 2015
 - 2.3.7. Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2015
 - 2.3.8. [Sexual violence and sexual harassment between children in schools and colleges](#) (December 2017)

3. Introduction

- 3.1. There are five main elements to Oswestry School's Safeguarding and Child Protection Policy:
 - 3.1.1. Prevention (positive school atmosphere, careful and vigilant teaching, pastoral care, support to pupils, providing good adult role models).
 - 3.1.2. Protection (following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns).
 - 3.1.3. Support (to pupils and school staff and to children who may have been abused).
 - 3.1.4. Safer Recruitment programme: The school complies with the requirements made by Working Together to Safeguard Children Department of Education 2015 and the statutory guidance provided by Keeping Children Safe in Education 2016. The school has a Safer Recruitment policy which enhances the safer recruitment programme and a staff behaviour policy which details the expectations of staff behaviour.
 - 3.1.5. To contribute to an inter-agency approach to child protection by developing effective and supportive liaison with other agencies and schools.

4. Objectives

- 4.1. Pupil education
 - 4.1.1. We try to create an environment and ethos in which children feel secure, their viewpoints are valued, they are encouraged to talk and they are listened to.
 - 4.1.2. We provide suitable support and guidance so that pupils have a range of appropriate adults whom they feel confident to approach if they are in difficulties. This is displayed in the houses and in the school planner.
 - 4.1.3. We use the School's curriculum to raise pupils' awareness and build confidence

so that they have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

- 4.1.4. Staff treat the children with respect and all pupils are expected to treat each other and staff with respect
- 4.1.5. Senior Prefects are briefed by Deputy Head Pastoral with regards to their seniority and the School's Safeguarding and Child Protection Policy

Staff education

- 4.1.6. We provided child protection training regularly to staff (both academic and support staff) to ensure that their skills and expertise are up to date. All staff undergo initial training in child protection during their induction programme and are given a copy of this policy and Part 1 of KCSIE to read and understand (September 2016) in preparation for joining the school staff.
- 4.1.7. Support staff are given the same guidance, training and safeguarding procedures within the School. All visitors to the School are given a safeguarding cue card when signing in at the School reception. All contractors are effectively checked and supervised appropriately when they are on site.
- 4.1.8. Each member of staff must sign to say that they have read and understand this policy in its entirety and that they accept their duty:
- 4.1.9. To be familiar with this policy and to have read and understood Part 1 of KCSIE (September 2016)
- 4.1.10. DSL undertake LA training every two years, all other staff undertake LA training every three years. Safeguarding training is part of the annual staff training programme and is a cornerstone of our HR modules. In addition all staff members receive regular safeguarding and child protection updates via email and staff meetings.
- 4.1.11. All members of staff are to implement this policy and co-operate with the School's management in promoting safeguarding and child protection

4.2. Educating parents

- 4.2.1. We make our Safeguarding and Child Protection Policy available to all parents (and all members of the general public) on the School website or in writing on request. Parents are invited to attend appropriate events such as e-Safety awareness.

5. Roles and Responsibilities

- 5.1. Sue Nancini, Deputy Head Pastoral (or in her absence Julian Noad) is our Designated Safeguarding Lead (DSL). She has been fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in Annex B of Keeping Children Safe in Education. Both the DSL and her deputy regularly attend courses with child support agencies to ensure that they remain conversant with best practice. They undergo refresher training every two years and they both have a job description for their safeguarding roles and key activities. The DSL role is to ensure that each member of staff has access to and is aware of and

understands the school's safeguarding policy and procedures. Their training meets the requirements of the KCSIE September 2016.

- 5.2. The DSL and/or the deputy DSL can be contacted at any time (boarding staff have an emergency contact telephone number for the DSL and his/her deputy in all boarding houses).
- 5.3. Claire Belk (Head) is the designated senior lead for EYFS at Bellan House, the prep department of Oswestry School.
- 5.4. The DSL maintains close links with the LSCB for and reports at least once a year to the governors' on the child protection issues outlined above. The DSL will make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. The DSL will also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against someone working at the school and/or the police if a criminal offence is suspected. Any referral will be made within **24 hours** to the LADO.
- 5.5. The DSL will liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children 2015 and attendance at strategy meetings. The DSL will work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet.
- 5.6. The DSL receives focused training to support learning and understanding of the ever changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation. The DSL's and the School's focus is to support children in need through seeking early help and/or inter agency working, including using the Team around the Child Approach and/or the Common Assessment Framework.
- 5.7. The school's records on child protection are kept securely in the DSL's office, and are separated from routine pupil records. Access is restricted to the DSL and the Head.
- 5.8. **Ms Sue Nancini (Deputy Head Pastoral and Designated Safeguarding Lead).**
Role: to coordinate all matters relating to safeguarding and child protection issues.
These will include:
 - 5.8.1. Dealing with reports of abuse against children.
 - 5.8.2. Dealing with complaints against staff (employees of Oswestry School) by children.
 - 5.8.3. Making referrals to child protection agencies if appropriate. Any referral will be made within **24 hours** to the LADO.

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- 5.8.4. Keeping the Headmaster fully informed of all safeguarding and child protection issues that may arise.
 - 5.8.5. Ensuring all staff receive LA training in basic child protection at least every 3 years and have annual training in safeguarding training and child protection.
 - 5.8.6. Ensuring that all new staff are properly inducted apropos child protection.
 - 5.8.7. Liaising with the school governor with special responsibility for safeguarding and child protection and the Independent Listener on all matters relating to child protection.
 - 5.8.8. Ensuring the members of staff with child protection responsibilities in Bellan House, the Independent Listener and School Governor with special responsibility for safeguarding and child protection, receive appropriate training in child protection.
 - 5.8.9. Liaising with members of staff with safeguarding and child protection responsibilities in Bellan House.
- 5.9. **Mr Julian Noad, Headmaster (member of staff with safeguarding & child protection responsibilities). Role:**
- 5.9.1. To deputise for Senior Designated Lead in all matters relating to safeguarding and child protection
- 5.10. **Mrs Claire Belk, Head of Preparatory department (Head of Bellan House). Role:**
- 5.10.1. Deal with safeguarding and child protection matters arising in Bellan House, consult with Senior Designated Lead and participate in the annual review of policy.
- 5.11. **Miss B. Gull (School Governor with special responsibility for Safeguarding & Child Protection). Role:**
- 5.11.1. To liaise with the Senior Designated Lead on matters relating to safeguarding and child protection issues and to participate in the annual review of policy.
- 5.12. **Mrs. E. Moss (Independent Listener). Role:**
- 5.12.1. Act as a sympathetic adult (outside of the school) whom children may approach with their concerns.
 - 5.12.2. To inform the Senior Designated Lead of any safeguarding and child protection issues that may be brought to her attention.
- 5.13. **Teaching Staff:**
- 5.13.1. Abuse of children in attendance at school is most likely to be first noticed by teaching staff or housemaster/mistress. Teachers bring a number of particular advantages to the recognition of child abuse, i.e. They have regular and frequent opportunities to observe children, including opportunities to observe changes in their behaviour. They have an ongoing relationship with children, who may confide in them about difficulties they are experiencing. They have knowledge of the wide range of behaviour likely to be seen in children of a particular age. They have opportunities to observe the response of a group of children in particular situations. They will, therefore, be sensitive to surprising or unusual responses. These opportunities to see children in context give a particular value

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- to the observations of teachers and house staff. Their insights need to be complemented by the skills of other relevant disciplines, especially those of social workers and medical practitioners. A teacher may become concerned when a child tells the teacher about events that have happened to them or to a friend, brother, sister or when another adult claims to be aware of abuse.
- 5.13.2. Teachers value their relationship with parents/guardians and in many situations will share their initial concerns about a child with parents/guardians. However, in many cases the parents/guardians may be the abusers and so teachers should be prepared to share their concerns with other professionals at an early stage without necessarily informing parents of the action they propose to take. Teachers have a professional duty to:
- 5.13.3. Observe and be alert to signs of abuse.
- 5.13.4. Take immediate action in the child's best interest by reporting any suspicion or evidence of abuse or non-accidental injury to the Senior Designated Lead
- 5.13.5. Know the role of Senior Designated Lead and LSCB Procedures.
- 5.13.6. Enquire about the progress of individual cases in which they are/have been involved.
- 5.13.7. All teaching staff must understand the importance of reporting suspicious circumstances and be able to report signs of abuse to the Senior Designated Lead. Beyond the initial reporting of suspected child abuse, staff have a clearly restricted role, as further judgements and action decisions are the responsibility of other agencies with statutory powers to help the child.
- 5.13.8. [See our whistleblowing policy](#): for further guidance on the need to raise concerns and the appropriate channels for raising the concerns.
- 5.13.9. All staff may refer a suspected case of abuse directly to the LADO. Details of how to do this can be found on the School's Safeguarding and Child Protection notice-boards and in [Appendix A - contact details](#).
- 5.14. **Support Staff:**
- 5.14.1. As with teaching staff, support staff have a responsibility to observe and report any suspicion or evidence of abuse or non-accidental injury. All support staff must understand the importance of reporting suspicious circumstances and be able to report signs of abuse to the Senior Designated Lead. Support staff may also contact the LADO directly if they have concerns. Details of how to do this can be found on the School's Safeguarding and Child Protection Noticeboard and [Appendix A](#). Beyond the initial reporting of suspected child abuse, support staff have a clearly restricted role, as further judgements and action decisions are the responsibility of other agencies with statutory powers to help the child.
- 5.15. **Volunteers:**
- 5.15.1. As with teaching staff, volunteers have a responsibility to observe and report any suspicion or evidence of abuse or non-accidental injury. All volunteers must be instructed to report any incidents or contact the LADO directly if they have concerns. Details of how to do this can be found in [Appendix A](#).

5.16. **Senior Pupils/Prefects:**

- 5.16.1. Senior Pupils need to be aware of the need to report allegations or suspicions of child abuse to the Senior Designated Lead. Children often tell other young people, rather than staff or adults, about abuse.
- 5.16.2. Senior Pupils are provided with safeguarding training as part of their induction.

5.17. For further information on identifying symptoms of abuse, please see Appendix C.

5.18. **Governors:**

- 5.18.1. Betty Gull is the liaison governor for safeguarding and child protection and is the governor with specific responsibility for the prep department. The role of the designated governor is to liaise with the local authority on issues of child protection or in case of allegations against the Head or a member of the Governing Body . The governors carry out an annual review of the school's safeguarding policy and procedures with day-to-day issues being delegated to its Education and Welfare committee, which both the head and the designated safeguarding lead attend. The governing body is responsible for:
 - 5.18.1.1. reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
 - 5.18.1.2. ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay;
 - 5.18.1.3. approving amendments to safeguarding arrangements in the light of changing Regulations or recommended best practice.

5.19. **All Staff:**

- 5.19.1. We recognise that the school plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.
- 5.19.2. See [Safer Recruitment \(Recruitment, Selection, and Disclosure\) policy](#)
Disqualification from providing childcare or registration, including 'by association'
 - 5.19.2.1. All staff in our school are required to notify the school immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration including 'by association' i.e. they live in the same household (or someone is employed in their household) as someone who has unspent cautions or convictions for a relevant offence (please see a list of the relevant offences set out [here](#)).
 - 5.19.2.2. The 'by association' requirement also applies if you live in the same household as or someone is employed in your household who has been disqualified from working with children under the Childcare Act 2006.
- 5.19.3. The Childcare (Disqualification) Regulations 2009 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are

directly concerned in the management of that childcare.

5.19.3.1. The school takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify [the school/their manager] immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive. He/she must also notify the school immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

5.19.3.2. Staff who are disqualified from childcare or registration, including 'by association', may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the [head/bursar] for more details.

5.19.4. Preventing radicalisation (the Prevent Duty):

5.19.4.1. We recognise that it is a key role of the school to support children and that school may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

5.19.4.2. Staff acknowledge the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation.

5.19.4.3. Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

5.19.4.4. The Department of Education statutory Prevent Duty guidance can be accessed [here](#).

5.19.4.5. The Channel General Awareness course can be accessed [here](#).

5.20. Visiting Speakers

5.20.1. The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that 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.

5.20.2. 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.

5.20.3. 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 document including a photograph such as a passport or photo card driving licence.

6. Procedures for dealing with allegations or concerns about a child

- 6.1. The school treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our school staff are made aware of their duty to safeguard and promote the welfare of children in the school's care. Staff members are alerted to the particular potential vulnerabilities of learners with SEN and disabilities and looked after children. The school wishes to engender a culture of openness and safety and therefore staff are encouraged to report any concerns that they have regarding safeguarding to the Head or the DSL (or to the Chairman of Governors where the concern relates to the Head or a governor). Staff are reminded that the school's Whistleblowing Policy can be utilised if necessary.
- 6.2. The school emphasises Early Help and staff are able to identify learners who need this level of support. These are vulnerable children in school who require identification and monitoring by designated senior leads and pastoral staff who will complete the Early Help assessment forms and make referrals, where necessary. Identifying vulnerable children is about ensuring that there is a clear recognised difference between children at risk of significant harm and those who have been harmed or recognising whether there is a safeguarding concern. Further guidance can be found at shropshire.gov.uk/early-help
- 6.3. Every member of staff (including part-timers, temporary, visiting, contract and volunteers) working in school is required to report instances of actual or suspected child abuse or neglect to the DSL. This includes alleged abuse by one or more pupils against another pupil. Reference will be made to an external agency if there is risk of significant harm. We are a Boarding school and so staff need to be aware that children can be particularly vulnerable and that schools should be alert to pupil relationships and the potential for peer abuse - see the Anti-bullying policy for further information.
- 6.4. If staff members are unsure they should always speak to the DSL. In exceptional circumstances such as in an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care.
- 6.5. The DSL will report safeguarding concerns to the Head. Where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm, a referral to Children's Social Care will be made immediately. The school's local authority is Shropshire which operates the SSCB. Oswestry School's points of contact are all listed on the contact details page in [appendix A](#) of this policy.

7. Procedures for dealing with all disclosures/allegations of abuse

- 7.1. Allegations of abuse may be made against a member of staff, a volunteer, a governor, a pupil, parent or other person connected to the school.

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- 7.2. Allegations of abuse against teachers and other staff will be dealt with according to the statutory guidance set out in part four of KCSIE 2016. Staff should also have regard to the Staff Behaviour Policy to minimise the risk of allegations being made.
 - 7.3. If a member of staff is made aware of **any** allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth.
 - 7.4. On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.
 - 7.5. The member of staff should make and submit an accurate written record and inform the DSL **immediately** so that appropriate agencies can be informed within 24 hours and the matter resolved without delay. The DSL will contact the Local Authority Designated Officer (LADO) for advice or direction and will inform Ofsted if appropriate. In relation to our EYFS setting, the school will inform Ofsted as soon as is reasonably practicable, in any event within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.
 - 7.6. Should the allegation of abuse concern the DSL the member of staff should inform the Head and the deputy to the DSL who will act in the place of the DSL. Should the allegation be against the Head or governor the DSL will immediately inform the Chairman of Governors without the Head being informed first. It will be the Chair's responsibility to contact the LADO.
 - 7.7. The Head/DSL or the Chair of Governors will refer **all** allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the local authority designated officer (LADO) within 24 hours.
 - 7.8. Borderline cases will be discussed with the LADO without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern meet the relevant threshold. The LADO and the Head/DSL (or the Chair of Governors) will decide in the circumstances what further steps should be taken. This could involve informing parents and calling the police.
 - 7.9. If the allegation concerns a member of staff, a volunteer or another pupil he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The school will normally appoint a member of staff to keep the

person informed of the likely course of action and the progress of the case.

- 7.10. The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it) or malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive). If it is established that the allegation is malicious, no details of the allegation will be retained on 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 DfE advice.
- 7.11. If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff the matter will be dealt with in accordance with the Disciplinary Procedure. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children. In the case of pupil-on-pupil abuse which the school has reported to the LADO and which the LADO or statutory child protection authority decides to investigate further, the matter will be dealt with under the School Behaviour and Disciplinary Policy after discussion with the LADO.
- 7.12. During the course of the investigation the school in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education 2016 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.
- 7.13. Any pupils who are involved will receive appropriate care.

8. External reporting

- 8.1. We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, 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) at the school, or would have been removed had they not left.
- 8.2. Oswestry School will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and

resignation and voluntary withdrawal from any of the above.

- 8.3. 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 will consider making a referral to the National College for Teaching and Leadership (NCTL) 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). The school will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.
- 8.4. Where the school ceases to use the services of a teacher because of serious misconduct, or would have dismissed them had they not resigned, it will consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.
- 8.5. Since October 2015, section 5B of the Female Genital Mutilation Act 2003 places a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.
- 8.6. Should historical allegations of child abuse be made against a teacher who is no longer teaching, the School will, in accordance with Keeping Children Safe in Education, report the matter to the police. Similarly, allegations against a teacher who is no longer working at the School will also be referred to the police. All allegations of historical abuse should be referred to the Head or DSL straight away.

9. Reporting to Parents

- 9.1. In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Head who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the LADO.

10. Promoting awareness

- 10.1. The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age

amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy.

- 10.2. The PSHE programme teaches children about safeguarding, including online as part of our broad and balanced curriculum. Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right - abuse is never tolerated and should not be passed off as “banter”. See the anti-bullying policy for further guidance. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding.
- 10.3. All pupils know that there are adults to whom they can turn to if they are worried, including the school counsellor, the chaplain and the medical staff. If the school has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:
 - 10.3.1. All pupils have access to a telephone helpline enabling them to call for support in private.
 - 10.3.2. Every child has a pupil planner which contains guidance on where to turn for advice, including the counsellor.
 - 10.3.3. Our school nurse and all our boarding houses displays provide advice on where pupils can seek help.
 - 10.3.4. We provide leadership training to our head boy/girl deputy head boy/girl and their team of prefects/heads of houses which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
 - 10.3.5. We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the school's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection.
 - 10.3.6. We adhere to the DfE guidance on approaching incidents of sexting with the recently updated [January 2017 guidance](#). It is a crime to share sexual images of children and therefore any such incident must be reported. This is not to criminalise children as it is noted that there are incidents where peers share images with peers. Once reported it is for the police to decide whether it is in the public interest to pursue a prosecution. The school wishes to contribute to a societal culture where such behaviour is unacceptable.
 - 10.3.7. We adhere to the DfE guidance on approaching sexual violence and sexual harassment. Sexual violence is a crime and any incidents are to be reported to the police. Sexual harassment is not tolerated and nor is the culture which

supports such behaviours. The school does not view sexual misconduct as banter or part of growing up but as entirely unacceptable.

10.3.8. For more details on cyber-bullying please refer to the school's anti-bullying policy.

10.3.9. As a Boarding School we ensure that our prefect system is regularly supervised by boarding staff. They have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, prefects are given induction on appointment which includes how to contribute to the school's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse.

11. [Abuse of Position of Trust policy](#)

12. **Grooming and Entrapment**

12.1.1. In the NSPCC briefing on Grooming and Entrapment (July 2012), the definition of grooming is given as “a process by which an individual prepares a child for abuse. This is usually perpetrated by a significant adult in the child’s life either at home or somewhere else in the child’s environment.

12.1.2. ”Grooming is a conscious, purposeful, and carefully planned approach used by the offender to gain access to the child, gain the child’s trust and compliance and maintain the child’s secrecy to provide opportunities to abuse and reduce the likelihood of being reported or discovered. This process is thought to strengthen the offender’s abusive pattern of behaviour, as it may be used as a means of justifying or denying their actions.

12.1.3. In the context of education, those who sexually abuse tend to give attention to and show affection to potential victims, behaving in a manipulative and coercive manner rather than using violence. They use and abuse their position of trust and authority to befriend pupils and gradually desensitise them to sexualised behaviour, facilitating offending and reducing the likelihood of disclosure. The process of grooming begins when an abuser targets or selects a victim. The selection of the victim is influenced by the compliance of the pupil and the likelihood of secrecy. Offenders tend to target pupils who they can control. Most children respond to positive attention from a teacher or member of staff, and the praise of teachers can have a huge influence. Victims are often selected because the offender perceives them as vulnerable, isolated, and/or emotionally needy.

12.1.4. Pupils who are not getting on well with their parents or who are experiencing some type of emotional difficulty are often targeted not only because they might be responsive to the initial approach from someone in a position of trust, but also because they may be more likely to maintain silence. The offender may begin grooming by giving the pupil special attention, support, or rewards. The power of such rewards to affect the pupil should not be underestimated. Rewards from a teacher or other member of school staff may have a significant impact on the pupil’s motivation and understanding. Rewarding for the purposes of grooming may take place in the context of providing the pupil with additional help,

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- mentoring, advice in relation to a project or coursework, or opportunities for out of school activities, including overnight outings.
- 12.1.5. The offender uses these legitimate aspects of their role to subtly introduce and increase sexually related communication. This may be done by bringing up sexual matters in discussion, leaving materials related to sex out where the victim can see them or exploiting the victim's natural curiosity or uncertainty about sex. Touching and physical contact with the victim is gradually increased to test the child's ability to maintain secrecy and to desensitise the child through progressive sexual behaviours. The offender may also strive to provide the pupil with experiences that are valuable so that the pupil will be reluctant to lose or damage the relationship.
- 12.1.6. Grooming may also involve the parents of the victim so that the offender can gain their trust and approval. This will allow the offender to have greater access to the victim and enhanced ability to spend time alone with them. Parents are often pleased about the extra attention the teacher is giving their child, perceiving them as a positive authority figure and role model for their child. However, offenders may also carefully groom victims by systematically separating them from family and peers. The offender may come to represent the closest relationship the victim has, particularly if the victim is socially isolated or emotionally vulnerable. In such cases, the victim may be reticent to give up what he or she views as a "loving" relationship. Once isolated, victims are more easily exploited and manipulated into sexual relationships.
- 12.1.7. Some potential warning signs of grooming as a precursor to sexual abuse include:
- 12.1.7.1. A pupil receiving special attention or preferential treatment
 - 12.1.7.2. Excessive time spent alone with a pupil outside of the classroom
 - 12.1.7.3. Frequently spending time with a pupil in private or isolated areas
 - 12.1.7.4. Transporting a pupil possibly to or from school
 - 12.1.7.5. Making friends with a pupils parents and visiting their home
 - 12.1.7.6. Acting as a particular pupil's "listening ear"
 - 12.1.7.7. Giving small gifts, money, toys, cards, letters to a pupil
 - 12.1.7.8. Using texts, telephone calls, emails or social networking sites to inappropriately communicate with a pupil
 - 12.1.7.9. Overly affectionate behaviour with a pupil
 - 12.1.7.10. Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a pupil
 - 12.1.7.11. Other pupils are suspicious and make jokes or references
- 12.1.8. Oswestry School is a boarding school and we need to be mindful of the fact that staff have a different relationship with pupils; tutors spend time with pupils in their "home environment" and the housemaster/mistress and Assistant housemaster/mistress live in the same building. All staff working at Oswestry must be aware, however, that this environment offers a unique opportunity for a possible child abuser to settle and use this situation to their personal advantage. Any individual at the School who has particular concerns about another member

of staff should speak to the Designated Senior Lead.

13. Forced Marriage

- 13.1. The subject of forced marriage is highlighted in The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage (2014). Forced marriage occurs when a young person is forced into a marriage that they do not want, with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse. It is often—mistakenly—believed to be a religious practice. Forced marriage is an abuse of human rights and a form of domestic abuse which should be dealt with under child protection legislation. Schools are considered as being front line in protecting young people from this type of abuse and they may disclose such a fear to you. Their initial approach may be innocuous—such as talking about a holiday abroad and the fear of a forced marriage may only become apparent after a couple of conversations. If you are concerned that a pupil in the school has concerns or fears over forced marriage, let the Senior Designated Lead know immediately.
- 13.2. The following signs and symptoms could indicate that a young person is facing forced marriage. Though, the presentation of these signs and symptoms could also indicate that there are other difficulties and types of abuse that would require a referral to Children's Social Care also:
- 13.2.1. Absence and persistent absence from School
 - 13.2.2. Request for extended leave of absence from School and failure to return from visits to country of origin
 - 13.2.3. Siblings forced to marry
 - 13.2.4. Early marriage of siblings
 - 13.2.5. Self-harm or suicide of sibling
 - 13.2.6. Running away from home
 - 13.2.7. Concerns about mental health
 - 13.2.8. Accompanied to doctors or clinic
 - 13.2.9. Self harm
 - 13.2.10. Attempted suicide
 - 13.2.11. Being withdrawn from school by those with parental responsibility and not being provided with suitable education at home
 - 13.2.12. Sudden announcement of engagement to a stranger
 - 13.2.13. A girl may report that she has been taken to the doctor's, to be examined to see if she is a virgin.
 - 13.2.14. Cut or shaved hair as a form of punishment for being disobedient

14. Honour based violence (HBV)

- 14.1. HBV encompasses crimes which have been committed to protect or defend the honour of the family and /or the community, including forced marriage, female genital mutilation and breast ironing. All forms of so called HBV are abuse and should be handled and escalated as such. If in any doubt speak to the DSL.
- 14.2. Potential indicators are as the indicators for forced marriage and so it is useful to refer to

the same indicators above.

15. Female Genital Mutilation (FGM)

- 15.1. FGM is highlighted as a specific risk to girls and young women and the number of female children affected in the UK is difficult to assess as it is a practice shrouded in secrecy.
- 15.2. Staff should be alert to possible signs and the school will demonstrate immediate and appropriate action with regards any pupil thought to be at risk. FGM involves cutting and removing all or part of, and sometimes sewing the girl's external genitalia, normally without anaesthetic and can take place any time from birth onwards. It can have serious and long term health implications for girls and women. FGM has been a criminal offence in the UK since 1985. The indications below may highlight that FGM is being planned and further investigation should take place to exclude the risks of FGM:
 - 15.2.1. Parents from practising communities state that they or a relative will take the child out of the country for a prolonged period;
 - 15.2.2. A child may talk about a long holiday to her country of origin or another country where the practice of FGM is prevalent, including African countries and the Middle East;
 - 15.2.3. A child may confide to a professional that she is to have a 'special procedure' or to attend a special occasion;
 - 15.2.4. A professional hears reference to FGM in conversation, for example a child may tell other children about it;
 - 15.2.5. A child may request help from a teacher or another adult;
 - 15.2.6. Any female child born to a woman who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family;
 - 15.2.7. Any female child who has a sister who has already have undergone FGM must be considered to be at risk, as must other female children in the extended family.
- 15.3. Indications that FGM may have already taken place include:
 - 15.3.1. A child may spend long periods of time away from the classroom during the day with bladder or menstrual problems;
 - 15.3.2. A child may have difficulty walking, sitting or standing;
 - 15.3.3. There may be prolonged absences from school;
 - 15.3.4. A prolonged absence from school with noticeable behaviour changes on the girl's return could be an indication that a girl has recently undergone FGM;
 - 15.3.5. Professionals also need to be vigilant to the emotional and psychological needs of children who may / are suffering the adverse consequence of the practice, e.g. withdrawal, depression etc;
 - 15.3.6. Child may ask for help or confide in a professional;
 - 15.3.7. A child requiring to be excused from physical exercise lessons without the support of her GP.
 - 15.3.8. Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain.
- 15.4. It is a statutory requirement that staff report incidents of FGM or that they report concerns that FGM is about to take place. The Mandatory reporting duty commenced in October 2015. Teachers must report to the police cases where they discover that an act

of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

16. Child Sexual Exploitation (CSE)

16.1. Child sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

17. Children with special educational needs and disabilities

- 17.1. SEN children and those with disabilities can face additional safeguarding challenges. These can include:
- 17.1.1. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
 - 17.1.2. Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing signs
 - 17.1.3. There may be communication barriers which may create difficulties in identifying safeguarding issues.
 - 17.1.4. DSL and head of LS work closely to track and monitor SEN children and those with disabilities

18. Radicalisation

18.1. Increasingly there is focus on the need to protect children from radicalisation. Our school promotes tolerance and harmony between different cultural traditions; we teach a broad and balanced curriculum which promotes the spiritual, moral and cultural development of pupils and prepares them for the opportunities, responsibilities and experiences of life. The school promotes community cohesion and safeguards against biased or unbalanced teaching and the promotion of partisan political views and ensure that when political or controversial issues are brought to pupils' attention, they are offered a balanced presentation of opposing views. Staff are nonetheless urged to be alert to those pupils who may be vulnerable to radicalisation and to pass on their concerns to the DSL.

18.2. Vulnerability Indicators:

18.3. The lists below are not exhaustive. The early warning signs may or may not indicate a

serious problem; they do not necessarily mean that a child is prone to violence towards themselves or others. This provides a basis to check concerns and put in place an appropriate response by getting help for a child before a problem escalates.

- 18.3.1. **Identity Crisis** - Distance from cultural / religious heritage and uncomfortable with their place in the society around them; parent or carer who holds extremist views; recent political or religious conversion; voicing opinion drawn from extremist ideology or narrative;
 - 18.3.2. **Personal Crisis** – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging; change in behaviour or appearance linked to ideological views; recent experience of serious traumatic event; graffiti symbols, writing or artwork promoting extremist messages or images;
 - 18.3.3. **Personal Circumstances** – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy; association with others who hold extremist views; Possession of literature associated with extremist views, or online material including networking sites;
 - 18.3.4. **Unmet Aspirations** – Perceptions of injustice; feeling of failure; rejection of civic life;
 - 18.3.5. **Criminality** – Experiences of imprisonment; poor resettlement /reintegration; previous involvement with criminal groups; use of extremist or hate crime terms to exclude others or incite violence.
- 18.4. Additional guidance can be found in Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism. Channel assesses vulnerability using a consistently applied vulnerability assessment framework built around three criteria. The three criteria are: a. Engagement with a group, cause or ideology; b. Intent to cause harm; and c. Capability to cause harm. The criteria are assessed through consideration of 22 factors. This framework is intended to work alongside professional judgement of staff rather than replace it.
- 18.5. The school offers training to all staff on this area of concern.

19. Child Missing from Education

- 19.1. All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect. School staff should follow the school's for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. We inform the local

authority of any pupil who is going to be deleted from the admission register where they: have been taken out of school by their parents and are being educated outside the school system e.g. home education. The school informs the local authority when a pupil leaves before a transitional stage. When a pupil's name is deleted from the admission register the school informs the local authority and supplies the following information:

- the full name of the pupil;
- the full name and address of any parent with whom the pupil lives;
- at least one telephone number of the parent with whom the pupil lives;
- if applicable, the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there;
- the name of pupil's destination school and the pupil's expected start date there, if applicable; and
- the grounds under which the pupil's name is to be deleted from the admission register

19.2. The school must inform the local authority 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, 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)¹⁰. The attendance policy outlines the procedures by which the pupil's attendance is monitored.

20. The Principles of Good Practice: Safety

- 20.1. The school must ensure that the site is a clean and safe environment for children.
- 20.2. All staff must have easy access to an up-to-date copy of the Safeguarding and Child Protection Policy
- 20.3. The school must ensure that all accidents are accurately logged in an 'accident book'.
- 20.4. The school must ensure that it has an accurate and up-to-date database detailing the contact numbers and medical information. These databases are confidential and stored safely.
- 20.5. The school must ensure that there are regular safety audits of all equipment (first aid kits, fire extinguisher, telephones, etc.,) and practise the fire drill.
- 20.6. The school must ensure that a responsible adult is on site when children arrive and ensure the full safety of children whilst on site.
- 20.7. On the school registration form parents and carers will be asked if they consent for photographs, or recordings to be taken for different uses including: use in the child's individual pupil profile, for display purposes, for promotional materials including the Oswestry school website, the school's prospectus and for use in the local press. The Head of Bellan (including EYFS) monitors to ensure that parents wishes are respected. Guidance on use of phone and other camera or video recording devices is to be found in [Acceptable Use of ICT policy](#)

21. Host families

- 21.1. The School may make arrangements for pupils to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family; this might happen as part of a foreign exchange for example. The government's statutory guidance '[Keeping children safe in education](#)' refers to host families in Annex C: Special Circumstances, paragraphs 2 – 6. The guidance is not conclusive and schools must ensure they can show they have undertaken a full risk assessment and have been able to mitigate any areas of concern. Schools must show the effectiveness of their safeguarding procedures and they are judged on how they manage the potential outcomes.
- 21.2. Placing students with host families raises safeguarding risks. Part of managing that risk is educating pupils to cope with all kinds of risks by understanding what they may be and how they can begin to tackle those challenges themselves. Conversely, spending time with a family in another country will offer a unique perspective in learning to managing risks there with local experts.
- 21.3. There is additional guidance in [Appendix E](#), along with guidance for the Host families.

Recruitment, General Supervision and Code of Conduct

- 21.4. When recruiting staff and volunteers the school must ensure all appropriate checks must be made. Please refer to the School's separate [Safer Recruitment policy](#).
- 21.5. The school must keep a careful check on all visitors and guests whether their visit is by invitation or unsolicited.
- 21.6. The school must ensure that there are sufficient staff (in the appropriate male/female balance) to run all activities.
- 21.7. All school staff must be an adult role model for children and young people: courteous, friendly and kind. No member of staff should make suggestive or discriminatory comments. We have drawn up a [Staff Behaviour policy](#) to lay out clearly our expectations of staff.
- 21.8. All school staff should respect children and young people at all times regardless of their sex, ethnicity, disability or sexual orientation.
- 21.9. No member of school staff must ever allow or engage in inappropriate verbal or physical contact of any description. **It is easy for certain types of behaviour to be misinterpreted.**
- 21.10. All school staff should be firm and fair with children. Favouritism should be avoided, as should singling out troublemakers. All staff should keep in mind the distinction between bad behaviour and the child exhibiting unacceptable behaviour.
- 21.11. No member of school staff should allow children or adults to engage in abusive activities such as initiation rites, ridiculing or bullying.
- 21.12. All members of school staff should redirect excessive attention-seeking behaviour into positive activity where possible.
- 21.13. The school must develop an ethos that allows staff to feel comfortable and caring enough to point out any inappropriate attitudes or behaviour to each other.
- 21.14. The school must encourage children to trust their own feelings about adult behaviour

and to assert their right to determine (within sensible limits) the behaviour with which they are comfortable.

- 21.15. All school staff should avoid unobserved one-to-one contact with a child or young person. When such a situation is unavoidable, the door must be left open and a colleague must ideally be within sight and hearing.
- 21.16. No male member of staff may enter an all-female room/dressing room etc. or vice versa.
- 21.17. All school staff should report disclosures or concerns to the Senior Designated Lead
- 21.18. School staff should never trivialise child abuse issues.
- 21.19. In cases where personal care tasks are required school staff must carry out these tasks with the knowledge and agreement of parents.
- 21.20. No member of school staff should drive or walk a young person home on their own unless the circumstances are exceptional.
- 21.21. The school will report immediately to the DBS any person (whether employed, contracted, a volunteer or student) who has harmed or poses a risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had he or she not left earlier. Consideration will be given to making a referral to the National College for Teaching and Leadership (NCTL)
- 21.22. Following the implementation of a new offence in April 2017 under [section 67 of the Serious Crime Act 2015](#) criminalising anyone over the age of 18 who intentionally communicates sexually with a child under the age of 16 or with an intention to encourage a child to make a communication which is sexual, the School reiterates that all staff must abide by all communication procedures within the school such as [Acceptable Use of ICT Policy](#) which details the use of emails, internet and social media. This offence applies equally to online and offline communications irrespective of the way the communication is made (for example it will apply to oral communications and written notes as well as to e-mails and text messages).

22. Protective Behaviours

- 22.1. Teaching 'Protective Behaviours' is part of the school's PSHE programme.
- 22.2. Children and young people are therefore made aware of the following:
- 22.3. Potential dangers and how to avoid them.
- 22.4. That if in trouble they should find an appropriate person in authority such as a teacher or policeman.
- 22.5. That sometimes it is all right to scream and shout to attract attention if they think they are in danger.
- 22.6. That they should not have to accept touching, kissing or language that makes them feel uncomfortable.
- 22.7. That some secrets are wrong and should not be kept.
- 22.8. That adults will listen to them if they reveal a secret.
- 22.9. Their right to say 'no' if someone tries to touch them in a way that frightens or confuses them.
- 22.10. That their bodies are their own, particularly their sexual organs.

23. Evaluation of Child Protection Procedures

- 23.1. The school monitors and evaluates its safeguarding policy and procedures through the

following activities:

- 23.1.1. Governing body visits to the school;
- 23.1.2. Senior leadership team discussion sessions with children and staff
- 23.1.3. Inviting staff to shape and contribute to the safeguarding arrangements and child protection policy
- 23.1.4. Pupil questionnaires
- 23.1.5. Frequent scrutiny of attendance data
- 23.1.6. Regular analysis of a range of risk assessments
- 23.1.7. Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school [e.g. sufficient account must be taken of the nature, age range and other significant features of the school, such as historical issues, in the provisions made for safeguarding].
- 23.1.8. Frequent scrutiny of governing body meeting minutes
- 23.1.9. Logs of bullying and/or racist behaviour incidents are reviewed regularly by the senior leadership team and the governing body
- 23.1.10. Regular review of parental concerns and parental questionnaires
- 23.1.11. Regular review of the use of pupil-specific social bases and clubs at lunchtime and after school
- 23.1.12. Regular review of training offered to staff, including e-safety training.

24. Annual Check Matrix

Policy:	Safeguarding and Child Protection Policy
Applies to:	All pupils in both the senior and junior schools
Author(s):	Ms S.A. Nancini, Deputy Head (Pastoral)
Approved by:	Miss Betty Gull (Governor) April 2003; Tim Moore-Bridger (Governor) February 2014, The Full Board 14/3/15, 3/12/16
Annual Review:	<i>I certify that I have reviewed this policy, and verify that, to the best of my knowledge, it reflects current legislation and is in accordance with the wishes of the Governing Body and Headmaster.</i>
Reviewer to enter initials and date last checked:	SAN 12/4/2013; SAN Mar 2014; SAN June 2014; SAN Feb 2015; SAN July 2015 SAN & SBMCH Sept 2015; JPN&SAN Jan 2016; JPN 29/9/16; SAN November 2017

SAFEGUARDING AND CHILD PROTECTION POLICY
September 2017



Oswestry School's Policies Catalogue [here](#)

SAFEGUARDING AND CHILD PROTECTION POLICY

September 2017



Do not call this number if you want to talk about a child. Case consultation is available from the Early Help advisors

EarlyHelp@shropshire.gov.uk

OFSTED Safeguarding Children

08456 404046 (Monday to Friday from 8am to 6pm)

Prevent Lead: 101
for non emergency referral
DfE dedicated telephone helpline and mailbox for non emergency advice for staff and governors
counter-extremism@education.gsi.gov.uk
020 73407264

West Mercia Police:

To contact the police by phone, 24 hours a day 101
If life is in danger or a crime is in progress 999
Protecting Vulnerable People (West Mercia Police) 0300 333 3000

Reporting FGM to Police

Since October 2015, it has been a legal obligation for all staff to report suspected cases of FGM to the police. West Mercia Police have trained, specialist officers who can be contacted by calling 101

Other useful numbers:

ISI 020 7600 0100
NSPCC 24 hour helpline 0800 800 5000
NSPCC Whistleblowing helpline 0800 028 0285
NSPCC Local Office 01743 281 980
Childline 0800 1111
National College for Teaching and Leadership 0345 609 0009
[Tel: 0345 609 0009]

Appendix B - How to respond to a disclosure

Receive

- Listen
- Accept what the children says
- Take it at their pace
- Try not to burden them with guilt by asking questions like, “Why didn’t you tell me before?”

Reassure

- Stay calm and reassure the child that they have done the right thing in talking to you
- Don’t promise confidentiality: you have a duty to refer a child who is at risk
- Try to alleviate any feelings of guilt that the child displays
- Acknowledge how hard it must have been for the child to tell you what happened
- Empathise with the child - don’t tell them what they should be feeling

React

- React to the child only to establish whether or not you need to refer this matter
- Do not ask leading questions ask open questions like “Anything else to tell me?” or “And?”
- Do not criticise the perpetrator
- Do not ask the child to repeat everything to another member of staff
- Explain what you have to do next and to whom you have to talk
- Inform the designated lead for child protection

Record

- Make some very brief notes, at the time, write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any noticeable non-verbal behaviour and the words used by the child
- Draw a diagram to indicate the position of any bruising
- Be objective in your recording: not your interpretations or assumptions

Support

- Make sure that you continue to support the child
- Get some support for yourself, without disclosing confidential information about the child to colleagues.

Appendix C - Types of Abuse and Neglect

Taken from Keeping Children Safe in Education (2016):

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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.

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.

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. 12 Specific safeguarding issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES website and NSPCC website. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- child missing from education – and see page 13 KCSIE
- child missing from home or care • child sexual exploitation (CSE) – and see page 14 KCSIE
- bullying including cyberbullying

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- domestic violence
 - drugs
 - fabricated or induced illness
 - faith abuse
 - female genital mutilation (FGM) – and see page 14 KCSIE
 - forced marriage
 - gangs and youth violence
 - gender-based violence/violence against women and girls (VAWG)

Appendix D - Step-by-step guide to dealing with allegations

Allegations of abuse against teachers and other staff will be dealt with according to the statutory guidance set out in part four of Keeping Children Safe in Education (July 2015). **If you have any doubts about making a report remember the possible consequences of not reporting, i.e. consequences for the child and yourself. (Not to report may be construed as neglect of care and therefore itself constitutes abuse.)**

It might happen that you become worried about a child's behaviour or injuries, but the child says nothing to suggest that he/she is being abused.

What to Do

- Be the sort of person a child can talk to.
- Be available and be prepared to listen.
- Discuss your concerns with the Senior Designated Lead
- Do not rely on someone else to take action.
- Make a dated record of concern(s) and share with the Senior Designated Lead

What to Avoid

If a disclosure is made to you (see [Appendix B](#) for further advice on receiving a disclosure):

- Do not allow your shock or distaste to show.
- Do not probe for more information than is offered. **You must not question the child or attempt to counsel the child.**
- Do not speculate or make assumptions.
- Do not make negative comments against the alleged abuser.
- Do not make any promises that you cannot keep, such as promising that "everything will be alright".
- CONFIDENTIALITY: **Do not agree to keep the information a secret.** Make sure that the child knows that the information will be passed on to the Senior Designated Lead
- Keep an accurate record of what they have been told

Staff must not:

- interrogate the child or ask leading questions
- speak to anyone about whom allegations are made (including colleagues)
- ask a child outright if they or others have suffered abuse

Handling inappropriate behaviour from colleagues:

It is our responsibility to behave well in all our dealings with children and specifically with the children for whom we have a duty of care. If, however, you believe that a colleague is behaving inappropriately, you **must** immediately follow the procedures laid down in the Safeguarding and Child Protection Policy; that is, report immediately to the Designated Senior Lead.

Loyalty to colleagues should not and **must not** deflect us from our duty of care to the children within the school. If you receive an allegation about any adult (or even about yourself) **you must report this**

immediately. Record the facts as you know them and follow the Child Protection procedures. Try to ensure that no-one is placed in a position which could cause further compromise and remember: **Always refer, never investigate.**

What Happens Next?

Once you have reported a concern to the Senior Designated Lead and that Lead has made a decision about the status of the concern (whether it is a Child Protection issue or not), a referral may be made and all further responsibility for gathering information and deciding what happens next will rest primarily with social services.

In some cases, a brief assessment might reveal the child to have needs which can be met by providing specific support. In other, more serious cases, the information provided to agencies by the Senior Designated Lead will trigger a full Child Protection investigation.

Social Services will not normally report back to the school should any referrals be made to them.

Allegations against school staff (and volunteers)

This is written in accordance with 'Working together to safeguard children' March 2015 and KCSIE. Teachers must ensure that their behaviour is entirely professional and staff should bear in mind that even perfectly innocent actions can sometimes be misconstrued. It is important not to touch pupils however casually, in ways or on parts of the body that might be considered indecent. The School has procedures for dealing with allegations against staff (and volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations.

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

Substantiated: there is sufficient evidence to prove the allegation;

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

False: there is sufficient evidence to disprove the allegation;

Unsubstantiated: there is insufficient evidence to prove or disprove the allegation. The term, therefore does not imply guilt or innocence.

When pupils make such an allegation against a member of staff, LSCB Procedures must be followed:

The Senior Designated Lead should be informed immediately and the Headmaster will contact the LADO and immediately discuss the allegation. This is important for the protection of the member of staff as well as the pupil.

The initial sharing of information and evaluation may lead to a decision that no further action should be taken in regard to the individual facing the allegation or concern, in which case the decision and its justification should be recorded by the Headmaster and the LADO. The Headmaster will then consult the LADO as to what action should be followed.

The Headmaster should inform the accused person about the allegation as soon as possible after consulting the LADO, providing them with as much information as possible at the time. However where a strategy discussion is needed, or police or the local authority care services need to be involved, the Headmaster should not do that until those agencies have been consulted and have agreed what information can be disclosed to that person.

At this point a decision will be made as to whether that person will be suspended from their duties. Suspension will be considered if there is cause to suspect that pupils at the School or are at risk from significant harm, or if the allegation warrants investigation by police.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with Working Together to Safeguard Children. Teachers who are the subject of an allegation of this nature will invariably feel threatened and isolated. It is essential to seek legal advice as soon as possible and teachers should be represented at all disciplinary hearings. Suspension in a case of this kind is a procedural step only and must be viewed as a neutral action that does not presuppose guilt or innocence.

Where a member of boarding staff is suspended, pending investigation of an allegation to do with child protection, alternative off-site accommodation will be provided by the school if necessary. The School will also act to manage and minimise the stress inherent in the allegations process. In the case of suspected or identified abuse of a child by the Headmaster, the police and/or the Local Authority Services have a duty to investigate. National guidelines have been produced and the first person to receive an allegation regarding the Headmaster should take it directly to the Senior Designated Lead and through them to the Chair of Governors. At this stage, after hearing a child's allegation, no discussion should be initiated by school staff with the Headmaster. Allegations regarding the Senior Designated Lead should be referred to the Headmaster.

Allegations against pupils:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour, discipline and sanctions will apply. Support must also be given to the member of staff who has listened to the young person after speaking to them and making the referral. They may need support to talk through what has happened and counselling is available if required.

A bullying incident may be treated as a child protection concern. See our [Anti Bullying Policy](#)

Acting on Concerns Regarding an Adult's Behaviour:

If you have any concerns about an adult's behaviour towards children or young people (not an employee or volunteer working for the School):

Do not ignore it – the School and Children's Social Care will take any concerns very seriously. You must discuss your concerns with the Senior Designated Lead, who will support you in liaising with the statutory agencies should any child protection matter arise.

Do not confront the adult but seek the advice of the Senior Designated Lead.

If they are not available contact one of the deputies or contact the LADO directly.

Acting on a Disclosure from an Adult that they are involved in the abuse of a child or young person:

If someone not employed by the School discloses that they are involved in the abuse of a child or young person, you must take action:

Believe what they are saying and take the allegation seriously.

Record details of what you have been told as soon as possible

Report it to the Senior Designated Lead, who will ensure the appropriate actions are taken, also explaining the limits of confidentiality.

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If for any reason you cannot immediately contact the Senior Designated Lead or one of the deputies, then you must directly contact either Children's Social Care or the Police.
Your actions must be communicated to the Senior Designated Lead as soon as possible.

Appendix E - Host families

There are three potential situations that the school prepare for: families in other countries who look after exchange students in a reciprocal arrangement when their children stay in England; people who look after children having been selected to undertake that role and who are paid to do so; and companies who specialise in working on behalf of schools to find accommodation in a family home. Each circumstance requires a different answer. These three situations can take place in England or abroad.

In the first example, our interpretation of Keeping Children Safe in Education 2016 Annex E ‘Children staying with host families’ is that where a school organises the hosting arrangements, this is ‘regulated activity’ because the school is a ‘regulated activity provider’. This means that the school must ask adults in the host family to complete Enhanced DBS checks, regardless of whether they are paid for the hosting or not. In another country, laws there would dictate the relevant vetting checks.

The second situation, where a school selects people for children to stay with and who are paid to take care of those pupils, is more straightforward. In this case, under the law in England, this is regulated activity under the ‘Safeguarding Vulnerable Groups Act 2006’ and would probably be described as “private fostering”. In such cases, all the adults in the household (some would argue all over 16, as that is the minimum age for a barring check to be requested) should be vetted by the Disclosure and Barring Agency.

In the third case, where a company provides hosts for the school and payment is made, that arrangement is likely to be deemed “private fostering” by the ‘Safeguarding Vulnerable Groups Act 2006’ and the third-party company is responsible for undertaking checks and demonstrating that they have done so.

Finally, it must be remembered that checks in other countries will be subject to their own laws. There is wide variability in the ease with which checks can be obtained and the quality of those checks. The DBS has no jurisdiction in other countries.

Safeguarding is about managing risk

Oswestry School looks carefully at all the potential safeguarding issues and makes arrangements that keep young people safe. The most important starting point will be excellent planning and liaison with the exchange school and their families. One aspect of this will be in clear written expectations and boundaries; another will be ensuring that pupils can urgently contact a member of staff from their own school should that be necessary. Other aspects would include thinking about sleeping arrangements and what happens should the student become unwell whilst away from the main group or in the home of the host family.

Further Information

Somerset County Council has a useful guidance document about [Exchange Visits](#).

[Outdoor Education Advisers’ Panel \(OEAP\)](#) also has relevant information and guidance.

- Homestay Information for Families

What To Expect

Homestay families are expected to act as the international student's "family away from home". You are not merely offering room and board to these students. Your role is to offer a safe, caring, and nurturing environment for these students to live in, just as you would your own children. Conversely the international students are not to look at your relationship as if they are "guests" to be waited on hand and foot. The relationship we are looking for is one of mutual understanding and trust and one where the homestay students should respect you and your children (if you have children) as they should respect their own family in their home country. We hope that not only can your homestay student learn much about British culture and lifestyle but that you too can learn much about your student's culture and way of life. These intrinsic rewards should be first and foremost for you rather than financial considerations.

Your Responsibilities as a Homestay Family

- All household members must agree to host a student.
- The Homestay family must provide a clean, friendly, and safe living environment.
- The Homestay family must provide the student with a private bedroom complete with a bed, dresser, desk, chair, lamp, and closet space and full access to a private or shared bathroom.
- The Homestay family can ask, but not expect, the student to do reasonable household chores
- Homestay family member must be willing to respect the religious or non-religious beliefs of their student.
- Homestay family members agree to respect the culture and values of their student.
- The homestay family will provide a variety of nutritional, well-balanced meals twice a day on a school day and three times a day at the weekend as well as daily snacks.
- The homestay family is willing to do the student's laundry, or provide laundry detergent, instructions, and a schedule for the student to do his/her own laundry.
- Homestay family members are willing and able to involve the student in various activities and outings.
- Homestay family members do not abuse alcohol or use drugs, nor allow the student to do so (for more information on this point, please see the [School Rules](#).)

If the student makes a request to move to another homestay, this request will be dealt with by Oswestry School's Senior Management Team.

As a Homestay family, all members of your family 16 years of age and older must have a DBS check, or agree to have one completed. Oswestry School will cover the financial cost of this.

Homestay Guidelines

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This information is intended to address the broad range of concerns of prospective homestay parents. In doing so, it deals with potential challenges, problems, and responsibilities that homestay parents may have to face in accommodating a foreign student. It should be stressed that homestays are normally rewarding experiences for both parties.

What can a homestay family do to prepare for an international student?

Do some homework. Study a few words of your student's language and read up on the history and culture of your student's country of origin. Learn to pronounce your student's name correctly.

Prepare your student's room with the required desk, lamp, bed, closet, and dresser. Other niceties such as putting up a welcome banner, providing a plant, magazines/pamphlets, or perhaps a small gift or treat on the bed would no doubt be greatly appreciated and make the student feel welcome in his/her new home.

What are they like?

First and foremost, they are children. They share many of the characteristics common to young people anywhere. As individuals they are at various levels of maturity and sophistication. Through time you will be able to determine your student's personality and degree of responsibility. Just treat him/her accordingly.

Some have previous international travel experience. Some have grown up in an urban environment. They may be used to a greater measure of personal independence than our children experience or less independence.

All of the students will have studied some English prior to arriving. Their English abilities will vary greatly though. Some students will come to us quite fluent and confident in their English abilities while others will arrive here not feeling very comfortable at all in speaking and comprehending English. With these students you will have to repeat and re-word sentences. Check for comprehension. Be patient and understanding, but encourage them to speak English immediately.

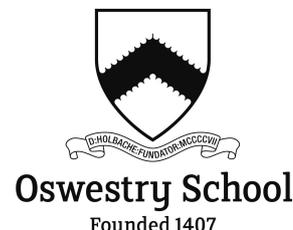
What should happen in the first few days?

The homestay family should do whatever it can to smooth the way for the student and at the same time adjust family life to accommodate the student as a new family member.

Within the first few days of arriving the homestay family should:

- inform the student how to address you, e.g. Mr./Mrs., John/Mary, Mum/Dad, etc.
- take them through the home routines, e.g. mealtimes, snacks, showers, laundry, chores, how to make a bed, etc.

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- demonstrate how to use all electrical appliances.
 - give the student your name, home address, and phone number on a card that will fit into a wallet.
 - take the student on a sightseeing tour of the area.

Because of the cultural and language barriers, it may be difficult at first for the students to make friends. They will not automatically make firm friends with family siblings. Much like natural siblings, they will relate better to some family members than others.

Can homestay families expect foreign students to conform to family rules of conduct?

Absolutely! It would be wise to establish with your student an understanding of house rules and regulations as soon as possible. Be sure to explain why you have set such guidelines. Kids are kids world-wide and your student will likely conform to your household routines and family rules much more easily if he/she is clear on just what they are.

What are host parents expected to provide?

Homestay families provide students with a home away from home in a supervised environment where the student's welfare is as important as that of any family member.

Students expect to have their own rooms, including a bed, bedding, a closet, chest of drawers, desk, and study lamp. Students should be able to have reasonable access to the bathroom and other common areas of the home. Outline to the student where he/she is free to go and which household areas are out of bounds. Reasonable use of the computer and internet should also be clearly outlined.

Parents are expected to provide the student with two meals on weekdays and three wholesome meals and snacks at the weekends. If your student is a teenager, remember how much a growing teenager eats. Students can be expected to get their own breakfast and make their own lunch if this is what you prefer. However, with younger students you may have to provide some assistance and supervision. Regardless of the age of your student parents are expected to prepare the supper meal for the student. It is recommended to take the student grocery shopping with you several times to determine their tastes and make them feel at home.

What support is available to homestay families and students

Occasionally, issues do arise and it is important to know who you can turn to for help. This will be different for each issue and outlined below are the various people who can be contacted to help and guidance.

Homestay contacts

Headmaster: Mr Julian Noad

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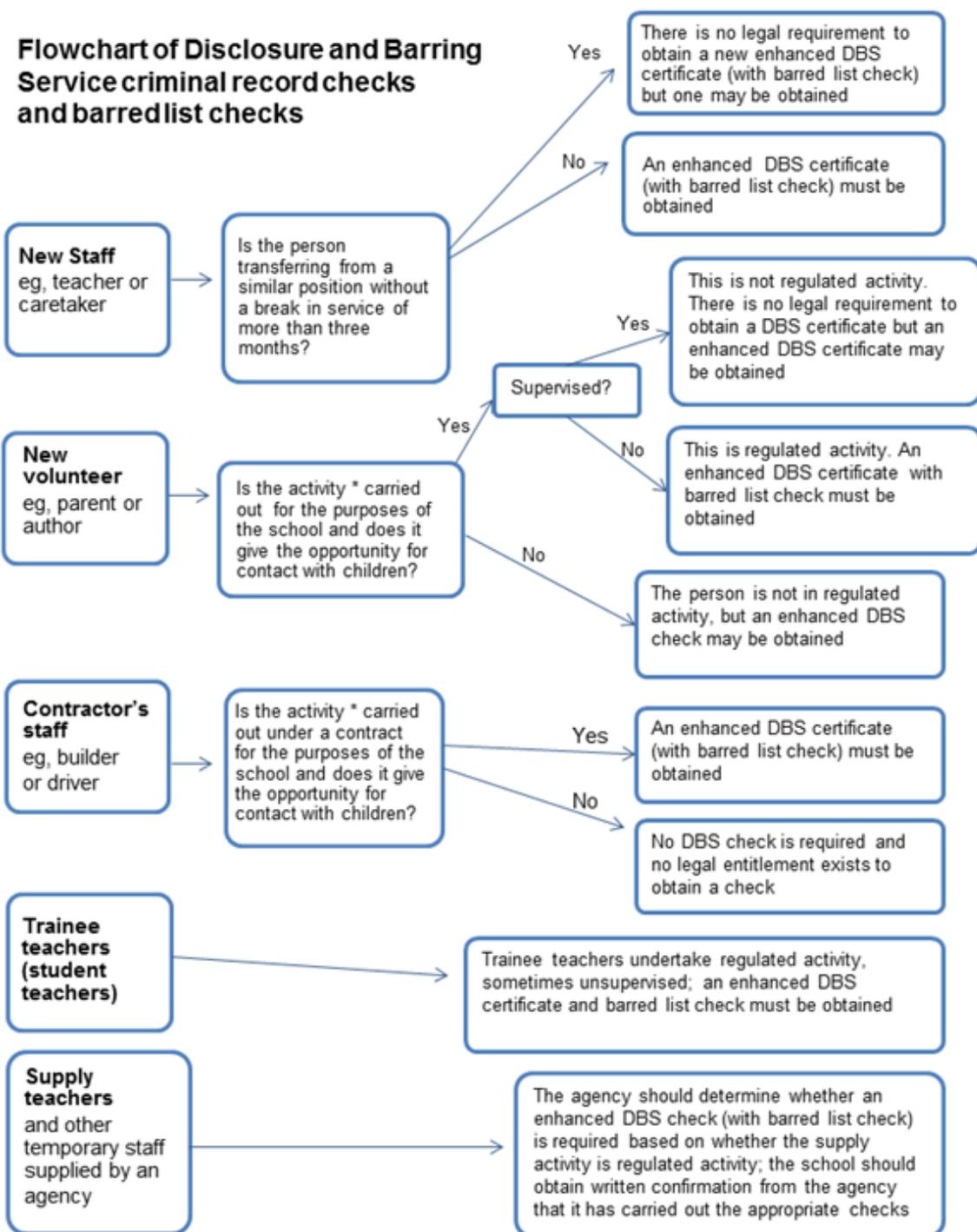


Telephone: 01691 681144
Email: ipn@oswestryschool.org.uk

Deputy Head Pastoral : Ms Sue Nancini
Telephone: 01691 681143
Email: san@oswestryschool.org.uk

Homestay Co-ordinator: Mr Matthew Morris
Telephone: 01691 681145
Email: mam@oswestryschool.org.uk

Appendix F - flow chart



* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'