



# Safeguarding Policy

Policy Type	Statutory
Regulation	ISSR: Part 3, 7
Approval Committee	Board
Last Review	Autumn 2023
Next Review	Autumn 2024

1	Related Information.....	5
1.1	Availability of Statutory Policies.....	5
1.2	Statutory Guidance .....	5
1.3	Supporting Documents .....	5
1.4	Terminology.....	5
2	Policy Statement.....	6
3	The Designated Safeguarding Lead and other Key Staff.....	7
4	Providing a Safe Environment for Students and Staff.....	9
4.1	Medical, Health and Safety .....	10
5	Child Protection Training and Teaching .....	10
6	Identifying and Recognising Signs of Abuse and Neglect.....	11
6.1	Types of Abuse and Neglect.....	12
6.2	Signs of Abuse.....	13
6.2.1	Signs of possible Physical Abuse.....	13
6.2.2	Signs of possible Emotional Abuse .....	13
6.2.3	Signs of possible Sexual Abuse .....	13
6.2.4	Signs of possible Neglect.....	14
6.3	Children with Special Educational Needs and Disabilities .....	14
6.4	Other Specific Safeguarding Issues .....	14
6.5	Children Absent from Education.....	14
6.6	Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines, and Serious Violence .....	15
6.7	Mental Health.....	16
6.8	So-called Honour Based Abuse .....	16
6.9	FGM Mandatory Reporting Duty .....	17
6.10	Forced Marriage .....	17
6.11	Preventing the Radicalisation of Children and Young People.....	17
6.12	Online Safety .....	18
6.13	Bullying.....	18
6.14	Domestic Abuse.....	19
6.15	Child-on-Child Abuse .....	19
6.15.1	Responding to Reports of Sexual Violence and Sexual Harassment (KCSIE (September 2023)).....	20
6.15.2	Action following a Report of Sexual Violence and Sexual Harassment .....	20
6.15.3	Options to Manage the Report.....	21
6.15.4	Ongoing Response for the Victim.....	22
6.15.5	Ongoing Response for the Alleged Perpetrator .....	22

6.15.6	Helpful Contacts .....	23
6.16	Signs of Abuse or where Safeguarding Concerns should be Raised.....	23
7	Reporting Concerns .....	24
7.1	What school staff should do if they have concerns about a child.....	24
7.2	Options for Action .....	25
7.3	Data Protection .....	26
8	Allegations .....	26
8.1	Guidelines for Allegations against Teachers, Support Staff or Volunteers.....	26
8.2	Low-Level Concerns .....	27
8.3	Whistleblowing.....	28
8.4	Guidelines for Allegations by one Student Against Another.....	28
9	The Appointment of Staff and the Recruitment of Volunteers .....	28
10	The EYFS (Early Years Foundation Setting) .....	29
11	Use of School Premises for Non-School Activities .....	29
12	Confidentiality and Information Sharing/Record Keeping .....	30
13	Contact Numbers .....	31
Appendix A – Procedure for Dealing with Allegations Against Staff.....		33
1.	Allegations against Staff .....	33
2.	Allegations against the Head, COO, Executive Principal or Chair of Governors ....	33
3.	Allegations against Supply Teachers .....	34
4.	Disclosure of Information .....	34
5.	Support.....	34
6.	Action to be taken against the Accused .....	34
7.	Suspension.....	35
8.	Criminal Proceedings.....	35
9.	Return to Work.....	35
10.	Ceasing to Use Staff.....	35
11.	Resignation.....	35
12.	Timescales .....	36
13.	Unfounded or Malicious Allegations .....	36
14.	Record Keeping .....	36
15.	Non Recent Allegations .....	36
Appendix B - Role of the Designated Safeguarding Lead.....		37
1.	Deputy Designated Safeguarding Leads.....	37
2.	Manage Referrals .....	37
3.	Work with Others .....	37

4.	Information sharing and managing the child protection file.....	38
5.	Training, knowledge and skills .....	38
6.	Providing Support to Staff .....	39
7.	Understanding the Views of Children .....	39
8.	Raise Awareness.....	40
9.	Holding and Sharing Information.....	40
10.	Availability.....	40
	Appendix C – Safeguarding Procedure for Commercial Lettings.....	41

# 1 Related Information

## 1.1 Availability of Statutory Policies

All statutory policies are available on the School's website.

## 1.2 Statutory Guidance

This statutory policy has been reviewed in accordance with the following guidance:

ISSR Part 3, 7(a)  
The standard in this paragraph is met if the proprietor ensures that—  
(a) arrangements are made to safeguard and promote the welfare of pupils at the School;  
and  
(b) such arrangements have regard to any guidance issued by the Secretary of State.

## 1.3 Supporting Documents

The following related information is referred to in this policy:

Anti-Bullying Policy
Behaviour, Rewards and Sanctions Policy
Code of Conduct for Staff
Codes of Conduct for the Use of ICT
e-Safety Policy
First Aid Policy
Individual Needs and SEND Policy
Low-Level Concern Policy
Missing Child Policy
Safer Recruitment and Disclosure Policy
Whistleblowing Policy

## 1.4 Terminology

**Executive Principal** oversees both Haberdashers' Boys' School and Haberdashers' Girls' School and the central functions comprising the Haberdashers' Elstree Schools.

**COO** means Chief Operating Officer of the Haberdashers' Elstree Schools.

**Head** where not explicitly defined, means the Headmaster of Haberdashers' Boys' School.

**Governor** means a Director of Haberdashers' Aske's Elstree Schools Limited acting in a governance capacity of one or more of the Haberdashers' Elstree Schools.

**Parents** includes one or both parents, a legal guardian, or education guardian.

**School** means Haberdashers' Boys' School, as now or in the future constituted (and any successor), part of Haberdashers' Aske's Elstree Schools Limited, the School Trustee of Haberdashers' Aske's Charity.

**Student** or **Students** means any student or students in the School at any age.

## 2 Policy Statement

Safeguarding underpins everything the School does with children if they are to thrive in all areas of life at the School and beyond. Every member of staff, supply staff, volunteer or contractor who comes into contact with children at the School has a role to play in safeguarding, a responsibility to act and to be confident reporting concerns, sharing information and putting the child's needs first, regardless of how difficult it might be or how uncomfortable it might feel. Staff are encouraged to maintain the attitude of 'it could happen here.'

This policy has been authorised by the Governors, is addressed to all members of staff, supply staff, including visiting music teachers, sports coaches and volunteers. It is available to Parents via the School website and also available to Parents in paper form on request. It applies to all those who work with Students even where this is away from the School, for example, at an activity centre or an educational visit. It also applies to EYFS (Early Years Foundation Stage) provision.

This policy has been developed in accordance with, and is directed by, the following legislation, statutory guidance and advice:

- Children and Social Work Act 2017
- Children Missing Education (September 2016)
- Counter-Terrorism and Security Act 2015
- Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers (2015)
- Keeping Children Safe in Education (KCSIE) (September 2023)
- London Safeguarding Children Board Child Protection Procedures 5th Edition 2016
- Prevent Duty Guidance for England and Wales (March 2015)
- The Advice and Guidance from the Safeguarding Partnerships and their Child Protection School Liaison Office
- The Children Act 1989, 2004
- The Education Act 2002
- The Female Genital Mutilation Act 2003 (via the Serious Crime Act 2015)
- The Prevent Duty (Departmental Advice for Schools and Childcare Providers June 2015)
- What to do if you are worried a child is being abused (March 2015)
- Working Together to Safeguard Children (July 2018)
- Voyeurism (Offences) Act 2019
- Working Together to Improve School Attendance May 2022

This policy aims to be a child-centred policy where the needs and views of the child are foremost in the decision-making and in the policy itself. Children want to be respected, their views heard, to have stable relationships with professionals built on trust and to have consistent support provided for their individual needs. "Nothing is more important than children's welfare" (Working Together to Safeguard Children July 2018). This premise underpins the provision and planning of PSHCEE and RSE lessons, form time and assemblies, the reviewing of anti-bullying procedures and policies, as well as the positive relationships Students have with teachers and tutors and the range of staff available for Students to turn to for support.

No single professional can have a full picture of a child's needs and circumstances. In order for children and their families to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy is reviewed annually, approved by the Board of Governors and signed off by the Chair of Governors. There may be a need, either through reviews or a change in staffing, legislation or guidance, to update the policy at any time during the School year. If this is the case the Designated Safeguarding Lead would inform the governing body via the Clerk to the Governors and the Governor with responsibility for safeguarding matters. The Safeguarding Governor pays regular visits to check that safeguarding processes are in place and being followed and produces an annual report to the Governing Board on safeguarding matters.

The School fully recognises its duties and responsibilities in respect of child protection and the safeguarding of all its Students is its highest priority. Every member of staff, supply staff, including visiting music teachers, sports coaches, volunteers and Governors is under a general legal duty to:

- Protect all children from all kinds of abuse
- Be aware of the School's Child Protection procedures and to follow them
- To always act in the best interests of the child, ensuring early help is sought whatever the concern.

Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (KCSIE (September 2023)). Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. "Children" includes everyone under the age of 18.

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

### **3 The Designated Safeguarding Lead and other Key Staff**

The School has appointed a member of the Senior Leadership Team to be Designated Safeguarding Lead for Child Protection (DSL). The DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring processes in place). The role includes liaising with the local authority, liaising with the Governor responsible for overseeing safeguarding matters, training (staff, governor and appropriate Student training), secure record-keeping and transfers of such records, as well as maintaining an overview of safeguarding within the School. See Appendix B – Role of the Designated Safeguarding Lead.

The DSL has the time, status and authority to be responsible for such matters. They are supported by the Head in their role. The Parents are welcome to contact the DSL if they have any concerns about the welfare of any child in the School, whether their concerns relate to

their own child, another child in the School or to any other member of the School community. The Parents or Students may also discuss concerns with a form tutor or another member of staff who will notify the DSL in accordance with the procedures outlined in Section 6 “Identifying and Recognising Signs of Abuse and Neglect” and Section 7 “Reporting Concerns”. If concerns relate to a member of staff, Parents or Students should contact the Head. All staff, including the DSL, will always report allegations of abuse against staff to the Head without delay (see Section 8 on “Allegations”). If the concern relates to the Head or the COO, they should contact the Executive Principal. If the concern relates to the Executive Principal, they should contact the Chair of Governors.

The DSL receives updated child protection training at least every two years so that they have a complete safeguarding picture. This will include local inter-agency working protocols and training in Prevent duties. This is supplemented with regular updates, for example, scenario training, e-bulletins and staff meetings at least annually. The DSL has relevant multi-agency training to make referrals and would normally lead on referrals, including those to Channel (the Prevent referral programme). The DSL will also support staff who make direct referrals to Social Care or Channel, and is available for general safeguarding advice for Students, staff and Parents.

**The Designated Safeguarding Lead (DSL) is Mrs Claire Shooter, Deputy Head (Pastoral), member of the Senior Leadership Team.**

Students, staff and Parents are able to seek safeguarding support or advice during the working day in term time (between 8am and 7pm on any school day) by calling our direct safeguarding line on 020 8266 1760 or by emailing [safeguarding@habsboys.org.uk](mailto:safeguarding@habsboys.org.uk). Should an urgent safeguarding issue arise outside these times, parents and students are advised to seek external support or to contact emergency services as appropriate.

In the absence of the DSL, a deputy DSL should be contacted.

**The Deputy DSLs in the Senior School are:**

- Mr Robert Sykes, Headmaster, 0208 266 1700
- Mr Tom Hardman, Head of Lower School, 0208 266 1753
- Mr Adam Lawrence, Head of Middle School, 0208 266 1751
- Miss Georgie Noble, Head of Sixth Form, 0208 266 1742

**The Deputy DSL in the Preparatory School is:**

- Mr Paul Swindell, Deputy Head (Pastoral), Preparatory School, 0208 266 1879

**The Deputy DSL in the Pre-Preparatory School is:**

- Ms Vicky Huggett, Head of the Pre-Preparatory, 0208 266 1951

The nominated Boys’ School Governor with responsibility for Safeguarding and Child Protection is Mr Jeremy Gladwin who can be contacted through the telephone number of the trustees, The Worshipful Company of Haberdashers, 0207 246 9988.



## 4 Providing a Safe Environment for Students and Staff

Every Student should feel safe and protected from any form of abuse which, in this policy, is detailed further in Section 6. The priority as a School is to provide all Students with a safe, secure and supportive environment in which they can learn, develop and have the best outcomes.

To ensure an effective safeguarding culture, the School will take all reasonable measures to:

- Protect each child from any form of abuse, whether from an adult, another Student or any other young person
- Ensure that all staff and volunteers are alert to the signs of abuse both in the School and from outside
- Establish, maintain and promote an environment and ethos in which Students, the School staff and volunteers feel safe and secure, are encouraged to talk and are confident of being listened to when they have concerns about the safety and wellbeing of a child
- Ensure that children are aware of how to safely report concerns they may have about their own safety and wellbeing or that of others
- Include opportunities in the PSHCEE and RSE curricula, assemblies and elsewhere for children to develop the skills they need to recognise and stay safe from abuse, including appropriate education around family relationships, personal intimate relationships, child-on-child abuse, emotional intelligence and resilience, accessing appropriate support, e-safety and radicalisation
- Work with Parents to build an understanding of the School's responsibility for the welfare of their children
- Provide sufficient support and guidance so that Students have a range of appropriate adults to whom they can talk if they experience difficulties
- Provide the services of a School Counsellor and ensure Students know how to access this support in the School
- Contribute to the prevention of abuse by ensuring that the provision of teaching helps Students to protect themselves and develops responsible attitudes to adult life and parenthood
- Deal sensitively and appropriately with every suspicion or disclosure of abuse
- Follow the local inter-agency procedures of the Safeguarding Partnerships (where a referral is made to another local safeguarding children's board their procedures and advice will be followed)
- Support a child who has previously been looked after and may now still be vulnerable; the DSL will inform appropriate staff of relevant information in these circumstances
- The DSL will liaise with the child's Virtual School if they are in care or have previously been in care
- Support children who have been abused in accordance with their Child Protection Plan
- Support children in need of additional support, for example through CAMHS or other agencies, and their families in order to provide early intervention and help
- Provide guidance to Parents, children and staff about obtaining suitable support
- Work with other agencies to provide the best support for the Student and/or their Parents
- Design and operate procedures which promote this policy, including relevant child protection training for all staff
- Ensure that all staff are identifiable on the School site as described in the School's policy on security

- Ensure that the DSL makes prompt contact with the police if a criminal offence is suspected taking context into account.

#### **4.1 Medical, Health and Safety**

The School will take all reasonable measures to:

- Be alert to the medical needs (and other possible needs) of children with medical conditions, whether physical or mental health issues
- Operate clear and supportive policies on drugs, alcohol and substance misuse
- Operate robust health and safety procedures
- Take practicable steps to ensure that School premises are secure
- Ensure all visitors sign in on arrival and out on departure and are escorted while on the School premises by a member of staff or appropriately vetted volunteer. All visitors are given a visitor badge which must be clearly displayed at all times
- The School has a Lone Working Policy for working in the School outside of normal working hours or in the School holidays
- Provide relevant and up to date medical and health and safety training.

The DSL for Safeguarding and Child Protection is on the School's Health and Safety Committee and oversees the School Health Centre, working closely with the School Nurses and Counsellor, and Head of Individual Needs.

## **5 Child Protection Training and Teaching**

All staff (including volunteers in regulated activity) are given regular Child Protection training (which includes Prevent awareness, how to identify children at risk, and online safety) in line with the recommendations and advice of the Safeguarding Partnerships. The Head, DSL, deputy DSLs and other nominated staff complete Child Protection DSL training every two years.

All staff receive training on how to be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime, gangs and county lines. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexpected injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff must read and confirm they have understood Part One of KCSIE and Annex B (September 2023) in order to fully understand and discharge their role and responsibility in terms of safeguarding children. Staff are also expected to read and understand this Safeguarding Policy, where the name and role of the DSL is detailed, in order to fulfil these responsibilities and to be able to respond to safeguarding concerns relating to Students or staff.

New staff joining partway through the year will also be issued with a copy of the Child Protection Awareness pack, containing photographs of the DSLs, either meet with or watch a brief video induction from the (Deputy) DSL, and complete Child Protection training online.

Visiting music teachers (VMTs), invigilators, PE coaches, supply staff and volunteers are given appropriate child protection training and as part of this are made aware of the School's child protection procedures and how to report any concerns.

All staff, supply staff and volunteers as part of their induction, should undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). Staff are directed to read the following documents:

- The School's Safeguarding Policy including the role and identity of the DSLs (this policy) which includes information on Children Absent from Education and procedures to deal with child-on-child abuse
- KCSIE Part 1 and Annex B (September 2023)
- Behaviour, Rewards and Sanctions Policy
- The Code of Conduct for Staff which includes guidance on staff/pupil relationships and communications using social media
- Low Level Concerns Policy
- Whistleblowing Policy
- Staff ICT Acceptable Use Policy.

All Governors of the School are required to complete relevant safeguarding training and updates so that they can 'assure themselves that the safeguarding policies and procedures in school are effective and support the delivery of a robust whole school approach to safeguarding'. (KCSIE 2023 Part 2, paragraph 81).

The School's catering, cleaning and grounds contractors that work on campus, have their own child protection training at level 1 and maintain their own records. The managers of these contracted companies are encouraged to attend the School's inset training in addition to this. Notices with photos and details of how to contact the DSL are posted on their notice board.

All contractors will complete a Comfort Letter confirming that all employees in their company have read the Safeguarding Policy, KCSIE Part One and Annex B and watched the Safeguarding Induction video prepared by the DSL.

All self-employed contractors will be required to read the Safeguarding Policy, the Safeguarding Induction video prepared by the DSL and any other mandatory policies depending on their role.

All safer recruitment checks for contractors will be undertaken by the People Team.

The DSL works closely with the Head of PSHCEE and pastoral leaders across the Schools to ensure that children are taught about safeguarding, including online and keeping themselves safe in an age-appropriate way.

## **6 Identifying and Recognising Signs of Abuse and Neglect**

All Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or

language barriers. This should not prevent staff from having a professional curiosity. Staff training covers the types of abuse, neglect and other safeguarding issues or causes for concern and the signs and symptoms in greater detail; the main points are highlighted below.

## 6.1 Types of Abuse and Neglect

All School staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. All staff, but especially the DSLs should consider whether children are at risk of abuse or exploitation in situations outside their families (contextual safeguarding). Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence, county lines and radicalisation

Types of abuse/neglect (as described in KCSIE (September 2023)):

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by 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 Parents fabricate the symptoms of, or deliberately induce, 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. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it. See section on child-on-child abuse.

**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 Parents 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.

**Complex and Organised Abuse:** may be defined as abuse involving one or more abusers and a number of related or non-related abused children and may take place in any setting. The adults concerned may be acting in concert to abuse children, sometimes acting in isolation or may be using an institutional framework or position of authority such as a teacher, coach, faith group leader or be in a celebrity position to access and recruit children for abuse. Such abuse can occur both as part of a network of abuse across a family or community and within institutions such as residential settings, boarding schools, in day care and in other provisions such as youth services, sports clubs, faith groups and voluntary groups. There will also be cases of children being abused via the use of electronic devices, such as mobile phones, computers, games consoles etc which all access the internet and, in particular, social networking websites. Although in most cases of complex and organised abuse the abuser(s) is an adult, it is also possible for children/young people to be the perpetrators of such harm, with or without adult abusers.

## **6.2 Signs of Abuse**

### *6.2.1 Signs of possible Physical Abuse*

Unexplained injuries, bruising, scalds, injuries on parts of the body where accidental injury is unlikely

- The child may be reluctant for you to contact Parents, they may flinch when approached or touched, they may be reluctant to change for PE, they may cover their legs and arms even when hot, they may exhibit behaviour which is unusual for them.

### *6.2.2 Signs of possible Emotional Abuse*

Failure to grow or thrive, sudden speech disorders, delayed development

- Compulsive nervous behaviour, unwillingness to socialise, excessive fear of mistakes and excessive lack of confidence, reluctance to have their Parents contacted, excessive deference towards others, especially adults.

### *6.2.3 Signs of possible Sexual Abuse*

- Pain, itching, bruising or bleeding in the genital or anal areas, STDs, recurrent urinary tract infections, stomach pain or discomfort when the child is sitting or walking

- Sudden and unexplained changes in behaviour, apparent fear of someone, self-harm, eating disorders or suicide attempts, sexualised behaviour inconsistent with the child's age, reluctance to change for PE, possession of unexplained amounts of money or gifts.

#### 6.2.4 *Signs of possible Neglect*

- Being constantly hungry and sometimes stealing food, unkempt, loss of weight or constantly underweight, being dressed inappropriately for the weather conditions, untreated medical conditions
- Being tired all the time, frequently missing School or being late, unable to socialise, often left unsupervised.

### **6.3 Children with Special Educational Needs and Disabilities**

Children with special educational needs disabilities (SEND) can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

### **6.4 Other Specific Safeguarding Issues**

All staff are made aware of, and alert to, other specific safeguarding issues, and given particular advice on these, by the DSL in the annual refresher training on CP matters. Further information can be obtained from the DSL.

Under the guidance of Children Missing in Education (September 2016), the School also has a duty to notify the local authority when a Student joins or leaves the School.

### **6.5 Children Absent from Education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. It is important that the School response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Staff are alert to patterns of regular absence and will alert the DSL in line with other potential safeguarding concerns.

The School has an admissions register which is kept accurate and up to date. The School, where reasonably possible, will hold more than one emergency contact number for each Student. The School monitors student attendance through the daily register and has a duty to inform the local authority of any Student who fails to attend School regularly or has been absent for a continuous period of 10 days or more without permission from the School or because of illness, unavoidable cause or religious holiday.

In line with the guidance from 'Working Together to Improve School Attendance', the School will work with local authority children's services where absence indicates safeguarding concerns and will let the LEA know when children leave the school at non-transition points. The School will also notify the LEA within five days of adding a student's name to the admission register at a non-standard transition point. Where the whereabouts of a child is unclear or unknown, the School will liaise with the LEA and wider authorities where necessary to make enquiries to try to find out where the child is.

Where a parent notifies the school in writing that they are home educating, the School will delete the child's name from the admission register and inform the local authority. However, where parents only orally indicate that they intend to withdraw the child to be home educated, the School will consider notifying the LEA at the earliest opportunity.

The School's attendance monitoring systems regularly highlight Students whose attendance falls below 95% to pastoral staff to ensure that attendance is closely monitored, and regular absence is followed up in the best interests of the child.

For further information see the Missing Child Policy.

## **6.6 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines, and Serious Violence**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when activity appears consensual, and it should be noted that exploitation does not always involve physical or in-person contact; it can also be facilitated and/or take place online. CSE and CCE can affect both male and female children and can include children who have been moved (trafficked) for the purpose of exploitation.

'County lines' is a term used specifically to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of 'deal line'. This activity can happen locally as well as across the UK. Children are increasingly being targeted and recruited online using social media. Children can become easily trapped by this type of exploitation as county line gangs can manufacture drug debts which need to be worked off or threaten serious violence or kidnap towards victims (and their families) if they attempt to leave the county lines network.

Forms of exploitation may include forcing children to move, store and sell drugs and money through county lines, working in cannabis factories, shoplifting or pickpocketing, being manipulated into committing vehicle crime or threatening/committing serious violence to others. Additionally, going missing and being found in areas away from their home, or being found in accommodation they have no connection with are also possible signs of involvement.

Indicators that signal children are at risk from or involved in serious violent crime include increased absence from school, changes in friendships or relationships with older individuals or groups, significant declines in performance, signs of self-harm or significant changes in wellbeing or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Risk factors which increase the likelihood of involvement in serious violence include being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

## **6.7 Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child, immediate action should be taken, following the Safeguarding Policy, and communicating with the DSL.

On rare occasions, a Student's mental health difficulties may be so severe that the School judges that the best way to safeguard a Student or other members of the school community is to ask parents/guardians not to send the Student into school. This will always be in consultation with the Student's parents/guardians and the external medical professionals who will almost certainly be involved at this stage. Whilst a Student is not attending for mental health reasons, the School will continue to provide schoolwork as appropriate, offer pastoral support and engage with external agencies as necessary. The School will work with parents/guardians and medical professionals to ensure a plan for the Student to return to school when it is safe for them to do so is in place and regularly reviewed.

## **6.8 So-called Honour Based Abuse**

So-called "honour based" abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse



(regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **6.9 FGM Mandatory Reporting Duty**

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police, where they discover (either through disclosure by the victim or by visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining Students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

### **6.10 Forced Marriage**

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or another form of coercion is used to cause a person to enter into a marriage. Staff should report to the DSL any Student they believe to be vulnerable. It is now a crime to carry out any conduct whose purpose is to cause a child to marry before the age of 18, even if violence, threats or another form of coercion are not used.

### **6.11 Preventing the Radicalisation of Children and Young People**

The School takes its duty to protect Students from the risk of radicalisation very seriously. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism as defined under Section 26 of the Counter-Terrorism and Security Act 2015. This duty is known as the Prevent duty. Under paragraph 7 of Prevent, extremism is defined as a “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of our armed forces”.

The School aims to protect and safeguard Students at risk of radicalisation and staff are alert to, and assess the risk of, Students being drawn into terrorism and extremist ideology. The School encourages healthy debate and discussion of issues at age appropriate levels and in various areas, not just PSHCEE, and promotes a tolerant, respectful culture across the School. The School’s Friday Faith assemblies are an example of this. Staff use their professional judgment to identify Students who might be at risk of radicalisation and who may be in need of help or protection. If a member of staff has concerns over a Student at risk they will share that with the DSL who will refer the issue to the local Children’s Social Care/Safeguarding Partnerships and the local Prevent Coordinator and/or Channel Panel, a

programme focussing on early support for a child or young person identified as being vulnerable to being drawn into terrorism or radicalisation.

## **6.12 Online Safety**

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around group chats, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL or deputy DSL.

The breadth of issues classified within online safety can be categorised into four areas of risk:

- Content (being exposed to illegal or harmful content, e.g., pornography, racism, antisemitism, fake news, misogyny, suicide or extremism)
- Contact (being subjected to harmful online interaction e.g., adults posing as children with the intention of grooming)
- Conduct (online behaviour that increases the likelihood of, or causes, e.g., the sharing of nudes or sending/receiving explicit images, or online bullying)
- Commerce (risks such as gambling, phishing or financial scams).

Measures are in place for appropriate online filters and monitoring systems which should be regularly reviewed to help ensure the online safety of Students whilst at School. The DSLs monitor and respond to any concerns which are triggered by the filtering and monitoring system. All staff should, as part of their online safety training at induction, gain an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The School aims to work in close partnership with Parents to ensure that children enjoy the freedom ICT brings whilst also understanding and knowing how to keep themselves safe. The safeguarding training that Staff receive also involves online safety training.

Within the ICT and PSHCEE curriculums, Students are taught a range of topics which include keeping safe on-line. The School has an e-Safety Policy, Students sign an Acceptable Use Policy and there is also a Mobile Phone Guidance to minimise inappropriate use of mobiles during the school day.

Cybercrime is criminal activity committed using computers and/or the internet. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL should consider referring into the Cyber Choices Programme.

## **6.13 Bullying**

The School has an Anti-Bullying Policy. A bullying incident will be treated as a child protection concern if there is reasonable cause to believe the child is suffering or likely to suffer significant harm. No one person works on their own when dealing with a bullying incident and the

threshold for referral is discussed in all cases. Details of cases are reported to Governors in safeguarding reviews throughout the year. The School maintains a bullying register.

#### **6.14 Domestic Abuse**

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The definition of domestic abuse ensures that different types of relationships are captured including ex-partners and family members. It can encompass a range of behaviours including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be ‘personally connected.’ Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse.’ Anyone can be a victim of domestic abuse regardless of gender, age, ethnicity, socio-economic status, sexuality or background and it can take place inside or outside of the home. Experiencing or witnessing domestic abuse can have a serious, long lasting emotional and psychological effect on children and they may sometimes blame themselves for the abuse.

#### **6.15 Child-on-Child Abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). All staff should understand that even if there are no reports in their School, it does not mean it is not happening, it may be the case that it is just not being reported. If staff have **any** concerns about child-on-child abuse they should speak to their DSL or Deputy DSL. Staff should understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as ‘just banter,’ ‘having a laugh,’ ‘part of growing up’ or ‘boys being boys’ can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based bullying and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent. This may include an online element which facilitates, threatens and/or encourages sexual violence
- Sexual harassment, i.e. unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of School. Sexual harassment is likely to violate a child’s dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse

- Upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.
- Physical behaviour such as deliberately brushing against someone
- Consensual and non-consensual sharing of nude or semi-nude images and/or videos, also known as youth produced sexual imagery
- Sexual exploitation; coercion and threats.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

#### *6.15.1 Responding to Reports of Sexual Violence and Sexual Harassment (KCSIE (September 2023))*

- Students may make a report about any sexual violence or harassment they experience or witness via their Form Tutor/ Head of House/ Head of Section/ School Nurse/ Counsellor/ DSL or any teacher they feel comfortable talking to. They can call the direct safeguarding line or email [safeguarding@habsboys.org.uk](mailto:safeguarding@habsboys.org.uk). For reports about harmful sexual behaviours they may also send an email to [report@habsboys.org.uk](mailto:report@habsboys.org.uk).
- If possible, such reports should be managed with two members of staff present, preferably one of them being the DSL or a deputy
- The School’s initial response to a report from a child is important. It is essential that ALL victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment nor should they ever be made to feel ashamed for making a report. It’s important to explain that the law is in place to protect young people rather than to criminalise them, and this should be explained in such a way that avoids distressing them
- All staff are trained as part of the annual child protection and safeguarding training how to raise a concern with the DSL
- Prep and Pre-Prep staff are provided with additional training each term, to reflect on case studies that articulate how KCSIE applies specifically to primary aged pupils
- If there is ‘reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm’, a referral will be made to appropriate external agencies

#### *6.15.2 Action following a Report of Sexual Violence and Sexual Harassment*

- Immediate consideration should be given as to how to best support and protect the victim and the alleged perpetrator (and any other children involved/impacted)
- The starting point regarding any report is the School’s zero-tolerance approach to any sexual harassment, violence or abuse. Staff will be especially careful not to normalise or allow any implication that such behaviour can be dismissed as ‘banter’. The School will carefully consider any report of sexual violence and/or sexual harassment. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the School’s initial response
- The DSL will take into account the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over

decisions regarding how any investigation will be progressed and any support that they will be offered

- The DSL will take into account the ages and developmental stages of the children involved and the nature of the alleged incident(s) including whether a crime may have been committed and consideration of harmful sexual behaviour
- The DSL will take into account any power imbalance between the children e.g. is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- The DSL will consider if the alleged incident is a one-off or a sustained pattern of abuse and consider if there are any ongoing risks to the victim, other children or the School staff and also consider other related issues and wider context in line with contextual safeguarding
- Reports of sexual violence or sexual harassment should include the time and location of the incident. Subsequent risk assessments will include any actions to make the location safer
- It is important to understand intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

### *6.15.3 Options to Manage the Report*

Every report will be considered on a case-by-case basis with the DSL or deputy taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. There are four likely options to consider when making a report:

1. Manage internally – if the DSL considers that the child concerned is not in need of early help or statutory intervention then it may be appropriate to handle the incident internally through utilising the School's behaviour and bullying policies and providing pastoral support. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions, and reasons for decisions should be recorded.
2. Early help – this means providing support as soon as a problem emerges and can be particularly helpful to address non-violent harmful sexual behaviour and may prevent escalation to sexual violence. Multi-agency early help will work best alongside the School's policies and engagement with Parents. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions, and reasons for decisions should be recorded.
3. Referrals to local authority children's social care – where a child has been harmed, is at risk of harm, or is in immediate danger the DSL will make a referral to the local children's social care. Unless there is a compelling reason not to, the DSL will inform the Parents. The School will not wait for the outcome of the social care investigation before protecting the victim and other children but will work alongside and co-operate with the relevant lead social worker to ensure the best support possible is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support. If the social care's review of the evidence means they do not believe statutory intervention is relevant, but the DSL is still concerned for the safety of the child, the DSL should be prepared to refer again. It will still be underpinned by

the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded.

4. Reporting to the police – any report to the police regarding a student aged under 18 will generally be in parallel with a referral to children’s social care. The DSL (and deputy) will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made the DSL must pass this on to the police, even if the alleged perpetrator is under ten years old. Unless there are compelling reasons, the School will inform the Parents. It will still be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable and will not be tolerated. All concerns, discussions, decisions, and reasons for decisions should be recorded.

Where there is a safeguarding concern, School leaders should ensure the child’s wishes and feelings are taken into account when determining what action to take. No matter what course of action is followed, the School will endeavour to provide support within its own pastoral structures, as well as helping signpost the Student(s) to external sources of support where appropriate.

#### *6.15.4 Ongoing Response for the Victim*

- The School will consider the age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse
- The needs and wishes of the victim will be paramount. Wherever possible, the victim should be supported to continue in their normal school routine.
- Victims may not disclose the whole picture immediately but provide information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. The victim will find it helpful to have a designated trusted adult to talk to and the School will respect this choice
- If the victim finds it difficult to maintain a full timetable, allowances will be made and a physical space to which the Student can withdraw will, where appropriate and possible, be provided
- The School will do everything it reasonably can to protect the victim from bullying or harassment as a result of any report they have made and provide ongoing support if necessary, continuing to work with social care and other agencies as required
- Efforts will be made to remove the perpetrator from classes they share with the victim and to keep them apart, for example on transport. These actions are in the best interests of the children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator
- If the victim moves to another educational institution the School will make them aware of any ongoing support needed; the DSL will ensure this happens, discussing with the victim and their Parents if appropriate. Any CP and safeguarding files will be transferred in accordance with the mandatory processes.

#### *6.15.5 Ongoing Response for the Alleged Perpetrator*

- The School will be mindful of the difficult balancing act of safeguarding the victim and providing the alleged perpetrator with an education and safeguarding support as appropriate and implementing any disciplinary sanctions

- The School will consider the age and developmental stage of the alleged perpetrator, and the nature of the allegations
- The School will consider the proportionality of the response and support and sanctions should be considered on a case-by-case basis
- The School will be mindful that, as well as potentially posing a risk of harm to other children, there is a possibility that the alleged perpetrator may have unmet needs. Their own harmful sexual behaviour may be a symptom of either their own abuse or exposure to abusive practices and/or materials. The School may take advice, as appropriate, from children's social care, specialist sexual violence services and the police
- Where a criminal investigation into a sexual assault leads to a conviction or a caution, the School should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion
- If the alleged perpetrator moves to another educational institution, the DSL must make them aware of any ongoing support needs and where appropriate, potential risk to other children and staff. Any CP and safeguarding files will be transferred in accordance with the mandatory processes.

#### *6.15.6 Helpful Contacts*

- Child Exploitation and Online Protection command (CEOP)
- The UK Safer Internet Centre provides an online safety helpline for professionals 0344 381 4772
- NSPCC helpline for professionals 0808 800 5000
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) – emotional and practical support for victims of sexual violence accessed via Rape Crisis and The Survivors Trust
- CAMHS – child and adolescent mental health services
- Rape Crisis Centre – therapeutic support for children who have experienced sexual violence
- Internet Watch foundation – potentially removes illegal images.
- Childline Report Remove Tool: Remove a Nude Image Shared Online
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people
- The Anti-Bullying Alliance – guidance for schools about sexual and sexist bullying.

#### **6.16 Signs of Abuse or where Safeguarding Concerns should be Raised**

Possible signs or indicators of abuse include (but are not limited to):

- Disclosure of abuse or any comment which gives rise to that inference
- There is no reasonable or consistent explanation for a Student's injury; the injury is unusual in kind or location; there are a number of injuries or a pattern to them
- The Student's behaviour changes suddenly, or their behaviour stands out as being extremely challenging behaviour or possibly extreme model behaviour
- The Student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- The Student's development is delayed
- The Student loses or gains weight
- Self-harming behaviour, including cutting and drug and alcohol abuse
- The Student uses inappropriate sexual language
- The Student displays a high level of anxiety
- The Student isolates themselves and becomes withdrawn

- The Student appears neglected, for example, hungry or inadequately clothed
- The Student is reluctant to go home, or has been openly rejected by Parents
- The Student's friendship circle in or out of the School changes significantly and/or suddenly.

## 7 Reporting Concerns

### 7.1 What school staff should do if they have concerns about a child

All staff (including supply staff and volunteers) have a professional duty to take immediate action on suspicions of abuse or reported allegations of abuse concerning Students. They also have a professional duty to report wider concerns about Students so that prompt action and early intervention can be taken to ensure they have the best outcomes. Staff should not assume a colleague will take action or share information that might be critical in keeping children safe.

Every report, disclosure or suspicion of abuse from within or outside the School will be taken seriously. Staff are aware, from training and from their reading of KCSIE (September 2023) that concerns should be raised immediately with the DSL.

The DSL will offer advice to staff reporting concerns and keep the Head informed of all referrals or allegations unless the Head or COO is the subject of the complaint which should then be reported to the Executive Principal. Where the allegation is about the Executive Principal, then the complaint should be made directly to the Chair of the Governing Body, Mr Simon Cartmell, or in his absence the Vice Chair (Boys' School), Mr Julian Gregory.

In the event of a situation where there is a conflict of interest in reporting the matter to the Head, COO, Executive Principal or Chair of Governors, this should be reported directly to the LADO.

If staff have a safeguarding concern or allegation about another member of staff (including supply staff, volunteers or contractors) that **does not** meet the harm threshold, then this should be shared in accordance with the Low-Level Concerns Policy.

The DSL or Deputy DSL should always be available during term time to discuss safeguarding concerns but in exceptional circumstances where he/she is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. Action should then be shared with the DSL or Deputy DSL as soon as is practically possible. A DSL or Deputy DSL will also be contactable for any safeguarding concerns from Commercial Hirers outside of term time. Please refer to Appendix C.

Concerns should be raised via MyConcern, with the date and time of the disclosure or cause for concern noted, and naming others present so that accurate records are maintained. Should a child be at risk of immediate harm, the staff member should also see the DSL or Deputy DSL in person without delay. Staff are aware of the need to respond immediately and to record accurately as records may be required to be disclosed in possible court proceedings. Any potential evidence must be safeguarded and preserved (for example, scribbled notes, mobile phones containing messages or screenshots of online evidence, clothing, and computers).



All staff are aware that confidentiality must not be promised and that leading, or closed-type questions, must not be asked. If a child makes a disclosure staff must listen carefully to the child and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. Any discussions will be handled with tact and sympathy and staff are made aware that the way in which they talk to a child may affect the evidence if the matter proceeds to court. The child will be reassured that they have done the right thing in coming forward and that information will only be shared with those who need to know.

## **7.2 Options for Action**

Each concern will be taken on a case-by-case basis and options will include:

- Managing any support for the child internally via the school's own pastoral support processes
- Undertaking an early help assessment
- The DSL might seek advice from the Safeguarding Partnerships using, for example, the Hertfordshire Consultation Hub on 01438 737 511. This is a Hertfordshire Multi-Agency Team providing a safeguarding consultation to practitioners with advice and guidance when the threshold for referral might not be met or the safeguarding needs of the child are unclear. It is not anonymous, and the DSL will share information about the Student, including their name. The DSL is under an obligation to act on advice given by this service, or that provided by another local Safeguarding Partnership.
- Making a referral to statutory services for example as the child might be in need, is in need or suffering, or is likely to suffer harm. The Parents will be informed about the need to refer whenever possible, except where, in doing so, the School would expose the child to further risk. The School is not required to gain the consent of Parents before referring an incident to the Designated Officer (LADO).

The DSL will take into consideration contextual safeguarding including whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

This might be followed by a Strategy Meeting or a Child Protection meeting in order to assess a child's needs with other agencies and to co-ordinate support in the School and/or with external agencies. The School will listen to the views of the child and the DSL will take these views into account in their decision-making. There may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a Student's wishes. The DSL and all staff will always act in the best interest of the child.

It is important to note that in exceptional circumstances where a DSL or Deputy DSL is not available, this should not delay appropriate action taking place and any staff member can refer their concerns directly to the relevant children's social care department. The local authority should make a decision within one working day of a referral being made about the type of response that is required and should let the referrer know the outcome.

Contact details for Hertfordshire and other local authorities can be found at the end of this policy. There is a flow chart outlining this process in KCSIE (September 2023).

### **7.3 Data Protection**

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

## **8 Allegations**

### **8.1 Guidelines for Allegations against Teachers, Support Staff or Volunteers**

The School will take all reasonable measures to design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations (referring to Part Four of KCSIE (September 2023) which looks at allegations of abuse made against teachers and other staff)).

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, malicious or unfounded allegations. These procedures, to be found in the Appendix, follow the guidance in KCSIE (September 2023) (Part Four: Safeguarding Concerns and Allegations made about staff, including supply teachers, volunteers and contractors) ).

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children, then this should be referred to the Head who will contact LADO, Hertfordshire, promptly and within one working day, without any prior investigation undertaken by the School. Any doubts or concerns over an allegation of abuse against a member of staff or apparently borderline cases can be discussed informally with the LADO.

Where appropriate the Head may consult with the DSL before reporting to the LADO, unless the allegation is against the DSL in which case the Head will go straight to the LADO. The accused person will be informed as soon as possible after the LADO has been consulted. Appropriate support will be provided, and a representative will be appointed to keep the accused person informed of the progress of the case as appropriate. The School would seek suitable legal advice as to due process and appropriate procedure.

Where an allegation is made about the Head of Prep, this should be referred to the Head.

Where an allegation is made against the Head or the COO, this should be referred to the Executive Principal without first notifying the Head or the COO. The Executive Principal will inform the Chair of the Governing Body, Mr Simon Cartmell, or in his absence the Vice Chair (Boys' School), Mr Julian Gregory.

Where an allegation is made against the Executive Principal, the person receiving the allegation should immediately inform the Chair of the Governing Body, Mr Simon Cartmell, or in his absence the Vice Chair (Boys' School) , Mr Julian Gregory, without first notifying the Executive Principal.

For an allegation against the Chair of Governors (or Vice Chair ((Boys' School))), this would be reported to the LADO via the Executive Principal.

Suspension will not be an automatic response to an allegation. The School has a duty of care to its employees and will offer appropriate advice when allegations are made and following guidance in KCSIE (September 2023) (Part Four: (Safeguarding Concerns and Allegations made about staff, including supply teachers, volunteers and contractors). The LADO will be consulted as to the appropriate action to take and full consideration given to all the options, subject to the need to ensure:

- The safety and welfare of the Students or Student concerned
- The need for a full and fair investigation.

Where an allegation by a Student is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's Behaviour, Rewards and Sanctions Policy.

Where Parents have made a deliberately invented or malicious allegation the Head will consider (in accordance with the School's terms and conditions) whether to require Parents to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably. The School reserves the right to contact the police to determine whether any action might be appropriate, whether or not the person making the allegation is a Student or Parents.

Staff are given clear and detailed guidance in the Code of Conduct for Staff on ensuring their behaviour or actions do not place them at risk of harm or of allegations of harming a Student.

If the School ceases to use the services of a member of staff (or governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS). Any such incident will be followed by a review of the safeguarding procedures in the School, with a report presented to governors without delay. Where a member of staff resigns and there are child protection concerns this will also be reported to the DBS. The School will inform the Teaching Regulation Agency (TRA) in both such cases.

Where the School becomes aware of an allegation against a former member of staff the School will seek advice and guidance from the LADO and/or the police.

## **8.2 Low-Level Concerns**

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, this should be shared in accordance with the School's Low-Level Concerns policy (see policy for more detail).

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or behalf of the school may have acted in a way that:

- is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work, and

- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Such examples might include staff being over-friendly with children, having favourites, taking photographs of Students on personal mobiles, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or humiliating pupils. See separate Low-Level Concern Policy for more detail which deals with the process to deal with any concerns (including allegations) which **do not** meet the harm threshold. Reports should be shared with the Head (via the DSL if preferred) and recorded and dealt with proportionately and appropriately.

### 8.3 Whistleblowing

All staff and volunteer should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regimes and know that such concerns will be taken seriously by the senior leadership team. There will be no retribution or disciplinary action taken against a member of staff for making a report, provided that it is done in good faith. The School has a Whistleblowing Policy which explains how to raise such concerns. Were a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they can also contact [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### 8.4 Guidelines for Allegations by one Student Against Another

A Student against whom an allegation of abuse has been made may be suspended from the School during the investigation process and the Behaviour Rewards and Sanctions Policy will apply. The School will take advice from the relevant children's social care and/or the police on the investigation of such allegations and take all appropriate action to ensure the safety and welfare of all Students involved including the Student or Students accused of abuse. If it is necessary for a Student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the relevant children's social care, Parents are informed as soon as possible, and that the Student is supported during the interview by an adult.

## 9 The Appointment of Staff and the Recruitment of Volunteers

The School recruits all staff and governors in accordance with the Safer Recruitment and Disclosure Policy. The School will take all reasonable measures to:

- Ensure that it practises safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with KCSIE (September 2023) (Part Three: Safer Recruitment – recruitment, selection and pre-employment vetting). A "by-association" form is included in the initial contract documents as part of these checks where appropriate
- Ensure that it carries out all necessary checks on the suitability of people who serve on the governing body
- Ensure that where the School ceases to use the services of any person (whether employed, contracted, a volunteer or Student) because that person was considered

unsuitable to work with children, a prompt and detailed report is made to the Disclosure and Barring Service (DBS) and TRA where appropriate

- Ensure that where staff from another organisation are working with the Students on another site, it receives assurances that appropriate child protection checks, and procedures apply to those staff
- Ensure that any visiting speaker, whether invited by staff or Students, has been suitably vetted in accordance with the Prevent statutory guidance
- Ensure that host families, and adults living in homes in the UK where exchange Students are going to be hosted have a satisfactory DBS check including Barred List check completed for the primary carer before the exchange takes place
- Ensure that sufficient relevant staff are trained in safer recruitment processes and at least one member of all interview panels are safer recruitment trained.

## **10 The EYFS (Early Years Foundation Setting)**

The practitioner responsible for safeguarding in the Early Years setting is Ms Vicky Huggett, DSL for the Pre-Prep.

In the EYFS setting, only a camera or mobile device belonging to the School may be used to capture images. Pictures or moving images taken of the children in the setting on the camera should be downloaded onto the School's secure network only. Pictures on the camera or mobile device are deleted from it immediately on downloading. Photographs of the children that are printed out are used in the School setting only or on promotional material unless consent is withdrawn by Parents in writing. Staff, Parents, visitors and Students in the setting may not take photographs on their own cameras, mobile phones or other device with imaging and sharing capabilities at any School event.

The use of any electronic device with imaging and sharing capabilities, including but not limited to mobile phones and cameras, in the setting to send or receive messages and phone calls by any member of staff, Parents, visitors or Student is also not permitted while the children are in the setting.

When children in the EYFS setting go on a School trip, only the School camera may be used to capture images of them. Any volunteer helpers on the trip are made aware of this requirement before the trip commences. Photographs taken on the trip on the School camera are downloaded onto the School's secure network only and deleted from the camera at the same time.

## **11 Use of School Premises for Non-School Activities**

Where the School hires or rents out its facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) appropriate arrangements are put in place to keep children safe. When services or activities are provided under the direct supervision or management of school

staff, our arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The School will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college. The School will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. See Appendix C for more detail.

## **12 Confidentiality and Information Sharing/Record Keeping**

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should include a clear, comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

The School (the DSL) will keep all child protection records confidential and secure, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under the statutory requirements of The Children Act 1989.

In accordance with Working Together to Safeguard Children (July 2018) the School recognises that effective sharing of information between professionals and local agencies is essential for effective identification, assessment and service provision. While Student consent to share information will in all normal circumstances be sought, the School recognises that fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. The child's views will be taken into account where possible, but the DSL and the Head will discuss each case where information might need to be shared with another agency and, if necessary, refer to Information Sharing: Advice for Practitioners providing safeguarding services to children, young people, parents and carers (2015) or seek legal advice.

In line with its obligations the School will pass on child protection records when a child or young person changes School. These will be sent confidentially via My Concern or by using a "signed for" delivery service/confirmation of receipt obtained. A copy may be kept until safe delivery at the new School and the copy will then be destroyed. Reasonable steps will be taken to ensure similar records are obtained from feeder schools and EYFS providers.

When the School is unsure of the Student's next educational setting, it will fulfil its duty to inform the Local Authority that the Student may be missing in education.

## 13 Contact Numbers

The Chair of the Governing Body is Mr Simon Cartmell, and the Vice Chair (Boys' School) is Mr Julian Gregory. They may be contacted c/o Haberdashers' Hall, 18 West Smithfield, London WC1A 9HQ or telephone 020 7246 9988.

Information for professionals and volunteers working with children residing in Hertfordshire can be found at:

<https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-board/professionals-and-volunteers/professionals-and-volunteers.aspx#>

Useful contacts include:

<u>MASH – Multi-Agency Safeguarding Hub (for referrals of Students living in Herts)</u>	Tel: 0300 123 4043
Where there are concerns for a child, a professional consultation is available by phoning: <u>Consultation Hub</u>	Tel: 01438 737511 (professionals only)
Where there are clear concerns about risk of harm to a child, a referral should be made to: <u>Hertfordshire.gov.uk/child protection</u>	Tel: 0300 123 4043
<u>CPSLO - Child Protection School Liaison Officer:</u> Freya Rymer freya.rymer@hertfordshire.gov.uk	Tel: 07795 051172
<u>Prevent non-emergency advice:</u> prevent@herts.pnn.police.uk	Tel: 020 7340 7264 counter.extremism@education.gov.uk
If you want to report a case of FGM, call <u>Herts Police</u>	Tel: 01707 354000/101
If you are concerned about Forced Marriage then contact the Forced Marriage Unit	020 7008 0151 fmu@fcdo.gov.uk
<u>Operation Encompass – for domestic abuse. The helpline is available for staff in educational settings Monday to Friday 8am to 1pm.</u>	020 4513 9990
<u>NSPCC Whistleblowing Helpline</u>	Tel: 0800 028 0285 help@nspcc.org.uk

If you have a concern about an adult at School, first inform the Head who will contact [lado.referral@hertfordshire.gov.uk](mailto:lado.referral@hertfordshire.gov.uk). You will then be directed to the Hertfordshire Local Designated Officer on duty.

The following telephone numbers may be useful for Students:

- Hertfordshire Contact Centre      Tel: 0300 123 4043
- Childline      Tel: 0800 1111
- NSPCC      Tel: 0808 800 5000
- Confidential Anti-Terrorism Helpline      Tel: 0800 789312

NB: The School's catchment area includes several boroughs and authorities, so telephone numbers of other local authorities are available from the DSL. To find out what borough a child is in go to [www.gov.uk/report-child-abuse-to-local-council](http://www.gov.uk/report-child-abuse-to-local-council)



## **Appendix A – Procedure for Dealing with Allegations Against Staff**

### **Section one: Allegations that may meet the harm threshold**

The School has procedures for dealing with allegations against staff, governors 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. These procedures will be used where the member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of School and is known as transferable risk.

For allegations that do not meet the harm threshold, staff should follow the guidance in the Low-Level Concerns Policy.

#### **1. Allegations against Staff**

The LADO should be informed of all allegations that come to the School's attention and appear to meet the criteria. Where an allegation or complaint is made against the DSL or any other member of staff or a volunteer, the matter should be reported immediately to the Head. Where appropriate, the Head will consult with the DSL and all allegations will be discussed with the LADO before further action is taken. When an allegation is made, there are two aspects to consider. The first is looking after the welfare of the child, and if the allegation is about the welfare of a child, then children's social care and as appropriate the police should be contacted directly. The second is investigating and supporting the person subject to the allegation.

#### **2. Allegations against the Head, COO, Executive Principal or Chair of Governors**

Where an allegation is made about the Head of Prep, this should be referred to the Head.

Where an allegation is made against the Head or the COO, this should be referred to the Executive Principal without first notifying the Head or the COO. The Executive Principal will inform the Chair of the Governing Body, Mr Simon Cartmell, or in his absence the Vice Chair (Boys' School), Mr Julian Gregory.

Where an allegation is made against the Executive Principal, the person receiving the allegation should immediately inform the Chair of the Governing Body, Mr Simon Cartmell, or in his absence the Vice Chair (Boys' School), Mr Julian Gregory, without first notifying the Executive Principal.

Similarly, if an allegation is made against the Chair of Governors the allegation should be reported to LADO. Again, any such allegations will be discussed with the LADO before further action is taken.

### **3. Allegations against Supply Teachers**

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. The school will ensure that any such allegation is dealt with properly, and in no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without find out the facts and liaising with the local authority to determine a suitable outcome. The School will fully involve agencies in any enquiries from the LADO, police and/or children's services, but understands that, as the organisation with direct access to Students and other School staff, it is likely that it will usually take the lead in any investigation involving a supply teacher.

### **4. Disclosure of Information**

The Head will inform the accused person of the allegation as soon as possible after the LADO has been consulted. The Parents of the child involved will be informed of the allegation as soon as possible if they do not already know of it. Where the LADO advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Head should not inform the accused or Parents until these agencies have been consulted and it has been agreed what information can be disclosed. The Parents should be kept informed of the progress of the case, only in relation to their child – no information can be shared regarding the staff member, and Parents should be made aware of the requirement to maintain confidentiality and avoid unwanted publicity whilst investigations are in progress.

### **5. Support**

A School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, guided by the LADO and the police where necessary. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate. The colleague should be advised to contact their trade union representative or a colleague for support, and employers should provide access to counselling or medical advice where appropriate.

### **6. Action to be taken against the Accused**

Where an investigation by the police or the local authority children's social care services is unnecessary, the LADO will discuss the steps to be taken with the Head or case manager (or the Chair of Governors where the allegation is against the Head). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further investigation to determine the appropriate action. If so, the LADO will discuss with the Head how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances, it may be appropriate to appoint an independent investigator as advised by the Hertfordshire Safeguarding Children Board.

## **7. Suspension**

Suspension must not be an automatic response to an allegation and should only be considered in a case where:

- there is cause to suspect a child or other children at the School is or are at risk of significant harm or
- the allegation is so serious that it might be grounds for dismissal.

The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment.

## **8. Criminal Proceedings**

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable. Wherever possible the School should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process.

## **9. Return to Work**

If it is decided that the person who has been suspended should return to work, the School should consider how to facilitate this, for example, a phased return may be appropriate and/or the provision of a mentor to provide assistance in the short term. The School should also consider how to manage the contact with the child who made the allegation.

## **10. Ceasing to Use Staff**

If the School ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors within one month. Where the individual is involved with teaching, the TRA will also be notified if the issue is unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

## **11. Resignation**

If a member of staff (or a governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School. Resignation will not prevent a detailed report being made to the Disclosure and Barring Service within one month in appropriate circumstances. Where the individual is involved with teaching, the TRA will also be notified if the issue is unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

## **12. Timescales**

All allegations must be dealt with as a priority. Where it is clear immediately that the allegation is unfounded or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Head should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days.

## **13. Unfounded or Malicious Allegations**

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager should consider whether the child and /or the person who has made the allegation is in need of help or may have been abused by someone else. In such circumstances, a referral to local authority children's social care may be appropriate.

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

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

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

## **14. Record Keeping**

Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal pension age or for a period of ten years from the date of the allegation, if this is longer, unless the allegation was found to have been malicious or false, in which case it will be removed from the employee's records. Other than where allegations are false, malicious, unsubstantiated, or unfounded the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.

## **15. Non Recent Allegations**

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child should be reported to the LADO in line with local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with local authority social care and the police. Abuse can be reported no matter how long ago it happened.

Section two: Concerns and or allegations that do not meet the harm threshold (see Low-Level Concerns Policy for more detail).

## **Appendix B - Role of the Designated Safeguarding Lead**

Governing bodies and proprietors should appoint an appropriate senior member of staff, from the School leadership team to the role of Designated Safeguarding Lead. The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role-holder's job description. This person should have the appropriate status and authority within the School to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

### **1. Deputy Designated Safeguarding Leads**

It is a matter for individual Schools as to whether they choose to have one or more Deputy Designated Safeguarding Lead(s). Any deputies should be trained to the same standard as the Designated Safeguarding Lead and will have the time, status and authority to be responsible for such matters to deputise for the Designated Safeguarding Lead where appropriate.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the Designated Safeguarding Lead; this lead responsibility should not be delegated.

### **2. Manage Referrals**

The Designated Safeguarding Lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required
- Support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and
- Refer cases where a crime may have been committed to the police as required.

### **3. Work with Others**

The Designated Safeguarding Lead is expected to:

- Liaise with the Head to inform them of issues, especially ongoing enquiries under Section 47 of The Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult
- Liaise with the "case manager" and the LADO at the local authority for child protection concerns which concern a staff member
- Liaise with relevant staff (e.g., SENCO/nurses/pastoral team) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding

whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically

- Liaise with the mental health support team where safeguarding concerns are linked to mental health.
- Promote supportive engagement with Parents and Carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes: ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- Act as a source of support, advice and expertise for staff.
- Act as a point of contact with the safeguarding partners.

#### **4. Information sharing and managing the child protection file**

The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and kept securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include a clear and comprehensive summary of the concern, details of how it was followed up and resolved, a note of any action taken, decisions reached and the outcome.

Where children leave the School (including in year transfers) the DSL should ensure their child protection file is transferred to the new school as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive.

#### **5. Training, knowledge and skills**

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at

least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, including local criteria for action and local referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children
- Understand the lasting impact that trauma and adversity can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- Are alert to the specific needs of children in need, those with special educational needs, those with relevant health conditions and young carers
- Understand the importance of information sharing, both within the School and with the safeguarding partners, other agencies, organisations and practitioners
- Understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice on and support to staff in protecting children from the risk of radicalisation
- Understand the unique risks associated with online safety and are confident they have the relevant up to date knowledge to keep children safe whilst they are online at school
- Can recognise the additional risks that children with SEN face online, for example from online bullying, grooming and radicalisation and have the capability to support children with SEN to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

## **6. Providing Support to Staff**

Training should support the DSL in developing expertise, so they can support and advise staff and help them to feel confident on welfare, safeguarding and child protection matters.

This includes specifically to:

- ensure that staff are supported during the referrals processes and
- support staff to consider how safeguarding welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

## **7. Understanding the Views of Children**

It is important that all children feel heard and understood. Therefore, DSLs (and deputies) should be supported in developing knowledge and skills to:

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

## **8. Raise Awareness**

The Designated Safeguarding Lead should:

- Ensure each member of staff has access to, and understands, the School's Safeguarding Policy and procedures, especially new and part-time staff
- Ensure the School's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure the School's Safeguarding Policy is available publicly and Parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this
- Link with the local Safeguarding Partnerships to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and School leadership staff.

## **9. Holding and Sharing Information**

The Designated Safeguarding Lead should be equipped to:

- Understand the importance of information sharing, both within the School, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection act 2018 and the UK General Data Protection Regulation (GDPR)
- Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record- keeping.

## **10. Availability**

During term time the Designated Safeguarding Lead (or a deputy) should always be available (during School hours) for staff in the School to discuss any safeguarding concerns.



## Appendix C – Safeguarding Procedure for Commercial Lettings

The School has procedures in place to ensure we can provide a safe environment and positive experience for all users. These procedures for Commercial hiring reflect the schools' current safeguarding procedures and incorporate Commercial operation and use. The School is committed to ensuring that users of our facilities and venues are safe and strive to maintain this with regular reviews, staff training and encouraging an environment of openness and vigilance. Our systems and processes fully support and promote safeguarding, which must take priority over profit. We carry out relevant checks to ensure that safer recruitment practices and safeguarding policies and procedures are adhered too or are challenged. All Commercial Hirers that involve adults working with young people agree to follow a code of conduct that promotes safe working practices and makes responsibilities and expectations clear, including the understanding that anyone can make a referral. Finally, the Commercial team works in partnership with external hirers to safeguard and promote the welfare of all users of the facilities ensuring they adhere to all safeguarding best practices.

### 1. Deputy Designated Safeguarding Leads

The Commercial team are Level 3 DSL trained to the same standard as the Designated Safeguarding Lead and will continue to keep their training relevant and up to date. The Commercial Deputy DSLs will be the main point of contact for any such safeguarding matters raised by Hirers during the holiday periods in the school year. The Commercial team are expected to help and support with referrals made by the Hirer DSL and will know how to get in touch with the DSL teams at the Boys/Girls' Schools to ensure they are made aware. The DSL team will seek advice and liaise where necessary with relevant agencies. During term time the Designated Safeguarding Lead (or a deputy) should always be available (during School hours) for staff in the Commercial Team to discuss any safeguarding concerns. Out of these hours, the Commercial Team should always be available, or have an adequate rota in place to enable them to contact a DSL.

### 2. Procedure for Commercial Hirers

Contractually each hirer must adhere to the following statements:

- You shall comply with our safeguarding policy.
- You shall provide us with the names of all Hirer Staff before they attend the Premises.
- It is a condition of this Agreement that you shall provide us with written confirmation that the following checks have been completed on each of the Hirer Staff before the Facilities Hire can commence:
  - verification of identity against an official document containing a photograph of the individual;
  - that a satisfactory enhanced disclosure from the Disclosure and Barring Service (DBS) has been obtained;
  - that a check of the Children's Barred List has been completed and that the individual is not barred from working with children; and
  - such other checks as are specified by Us from time to time in order for us to comply with Our statutory or regulatory obligations.
- You shall provide us with a copy of the enhanced DBS certificate for each of the Hirer Staff before they can attend the Premises so that we may determine whether the Hirer Staff are suitable to attend the Premises.
- You undertake and agree to immediately notify us if:
  - any of the Hirer Staff are or become barred from working with children or adults;

- any of the Hirer Staff are the subject of a referral to the DBS or any successor body;
  - any of the Hirer Staff are released under investigation, arrested, charged, cautioned or convicted of any criminal offence, the circumstances of which could have an impact on the welfare of children or adults;
  - any of the Hirer Staff receive a police caution, reprimand or warning, the circumstances of which could have an impact on the welfare of children or adults;
  - there is a formal child protection investigation of any of the Hirer Staff or any member of their household;
  - You become aware of any circumstances relating to any of the Hirer Staff that may be reasonably be considered to pose a safeguarding risk to children or adults; or
  - there is any change in the circumstances of any of the Hirer Staff that affects their right to work in the UK.
- If we determine that any member of Hirer Staff is unsuitable to attend the Premises for any reason we may in our ultimate discretion exclude that person from the Premises and prevent their future attendance at the Premises.
  - All Visitors who are not Hirer Staff must not have unsupervised access to children or vulnerable adults.
  - do not raise or gather funds for any external organisation or cause.
  - Any breach to our contractual safeguarding agreement shall be considered to be a material breach of the Agreement and shall result in immediate termination.

### **3. Referrals and record keeping**

Any Hirer working with young children has completed and signed a declaration indicating the designated DSL and the organisation's safeguarding protocols. The Hirer's DSL will be expected to liaise without delay with the School DSL (or deputy) on any safeguarding matters that occur on the School site. The Hirer is responsible for managing referrals and/or seeking advice from any relevant agency. They are responsible for ensuring accurate records are kept and shared accordingly so that the Commercial team have awareness as soon as possible of any safeguarding or child protection issues and will retain records within the relevant hirer file. The Commercial team are here to support and guide where necessary and to notify the Executive Principal and respective Heads.

### **4. Holding and sharing information**

Any Hirer working with young children should ensure they keep adequate records of any concern, allegation or referral. Using their discretion, they should inform schools, colleges, agencies and practitioners where necessary. The Hirer is responsible for ensuring any transferring of records is carried out safely and securely.