

Safeguarding and Child Protection Policy

September 2021

Contents

Key Contacts	3
Policy Statement	6
Definition of Safeguarding	9
Types of Abuse	9
Designated Safeguarding Lead	13
Duty of Governors and Staff	13
Training	14
Procedures	14
Secure School Premises	23
Confidentiality and Information Sharing	25
Monitoring and Review	26
Appendix 1 Types and Signs of Abuse	28
Appendix 2 Concerns About a Child – Guidance for Staff	40
Appendix 3 Responsibilities of the Designated Safeguarding Lead	42
Appendix 4 Reporting Allegations Against Staff	45
Appendix 5 Safeguarding During Remote Learning – COVID-19	49

Key Contacts

Designated Safeguarding Lead ("DSL")

Mr J Rist, Head of Pre-Prep

Telephone number: 01223 803995 or 01223 365814 ext. 260

Email: jrist@kcs.cambs.sch.uk

Deputy Designated Safeguarding Lead ("Deputy DSL")

Mrs Alison Gelling, School Nurse

Telephone number: 01223 365814

Email: agelling@kcs.cambs.sch.uk

Designated Person

Mrs Helen Williams, Year 6 Form Tutor

Telephone number: 01223 365814

Email: hwilliams@kcs.cambs.sch.uk

Head

Mrs Yvette Day, Head and Master over the Choristers

Telephone number: 01223 365814

Email: head@kcs.cambs.sch.uk

Chair of Governors

Rev Dr Stephen Cherry, Dean of King's College, Cambridge

Telephone number: 01223 331419

Email: dean@kings.cam.ac.uk

The **Nominated Safeguarding Governor** is Mr Stuart Thackrah who can be contacted by email at:

cp-governor@kcs.cambs.sch.uk.

Key External Contacts

Local Authority Designated Officer

Telephone Number: 01223 727967 or 01223 727968

Email: LADO@cambridgeshire.gov.uk

Cambridgeshire County Council Children's Social Care Team

Telephone Number: 0345 045 5203 Monday to Friday, 8am - 6pm

01733 234724 Outside the above hours and at weekends

Email: ReferralCentre.Children@cambridgeshire.gov.uk

If the above numbers fail to answer, dial 999 in emergency.

Cambridgeshire & Peterborough Safeguarding Children Partnership Board

Telephone number: 0345 045 5203

Out of hours: 01733 234724

The following numbers may be useful for pupils:-

ChildLine 0800 1111

NSPCC 0808 800 5000

Counselling

Services Centre 33 01223 316488

Counselling referrals via the family GP

National Domestic Abuse Helpline

0808 2000 247

Advice and Support about Extremism

Key contacts within Cambridgeshire Police are:

Kevin Vanterpool kevin.vanterpool@cambs.pnn.police.uk

Matt Newman matt.newman@cambs.pnn.police.uk

Advice and Support for the Cambridgeshire Channel Project:

Steve Lodge steve.lodge@cambs.pnn.police.uk

The Department for Education dedicated helpline for staff and Governors is 020 7340 7264 and counter-extremism@education.gsi.gov.uk

UK Safer Internet Centre

0344 381 4772

helpline@saferinternet.org.uk

FGM

Cambridgeshire Constabulary Child Abuse Investigation Unit

Monday to Friday 8.00am to 8.00pm Tel: 01480 847743

Saturday / Sunday 8.00am to 5pm

Bank Holidays 8am to 4pm

Cambridgeshire County Council Out of Hours Emergency Duty Team Tel: 01733 234724

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

Multi Agency Safeguarding Hub (MASH)

Tel: 01480 847743

Email: mash.cp@cambs.pnn.police.uk

The **NSPCC whistleblowing helpline** can be contacted on:

National Society for the Prevention of Cruelty to Children (NSPCC)

Weston House

42 Curtain Road

London

EC2A 3NH

Tel: 0800 028 0285

Email: help@nspcc.org.uk

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

Reporting serious wrongdoing to the Charity Commission

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

whistleblowing@charitycommission.gsi.gov.uk

1 Policy Statement

- 1.1 This is the *Safeguarding and Child Protection Policy* of King's College School, Cambridge ("the **School**").
- 1.2 The Kings College of Our Lady and St Nicholas in Cambridge (the 'College') is responsible for safeguarding and child protection at the School. The College has appointed the School Governors' Council Committee (the 'Governors') to oversee and supervise safeguarding at the School. The Governors, in turn, delegate the day-to-day management of the School's safeguarding and child protection procedures to the Head.
- 1.3 This policy is designed to address:
- 1.3.1 the School's charity law safeguarding duty to:
 - (i) provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;
 - (ii) set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
 - (iii) have adequate safeguarding policies, procedures and measures to protect people;
 - (iv) provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority and Charity Commission; and
 - 1.3.2 the specific statutory obligations on the School to safeguard and promote the welfare of children, as defined below.
- 1.4 This policy has been prepared to meet the School's responsibilities under:
- 1.4.1 Education (Independent School Standards) Regulations 2014;
 - 1.4.2 Boarding schools: national minimum standards (Department for Education (DfE), April 2015);
 - 1.4.3 Statutory framework for the Early Years Foundation Stage (DfE, March 2017);
 - 1.4.4 Education and Skills Act 2008;
 - 1.4.5 Children Act 1989;
 - 1.4.6 Childcare Act 2006;
 - 1.4.7 Children and Social Work Act 2017;
 - 1.4.8 Data Protection Act 2018 and General Data Protection Regulation (GDPR);
 - 1.4.9 Equality Act 2010; and

1.4.10 Charities Act 2011.

1.5 This policy has regard to the following guidance and advice:

- 1.5.1 Keeping Children Safe in Education (DfE, September 2021) (KCSIE);
- 1.5.2 Working Together to Safeguard Children March (HM Government, July 2018) (WT);
- 1.5.3 Disqualification under the Childcare Act 2006 (DfE, 31 August 2018);
- 1.5.4 Revised Prevent Duty Guidance for England and Wales (HM Government, July 2015);
- 1.5.5 Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (HM Government, April 2015);
- 1.5.6 Multi-agency statutory guidance on FGM (HM Government, April 2016);
- 1.5.7 UK Council for Internet Safety Guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020).
- 1.5.8 What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);
- 1.5.9 Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018);
- 1.5.10 Children missing education (DfE, September 2016);
- 1.5.11 Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);
- 1.5.12 Educate Against Hate (HM Government 2018);
- 1.5.13 Sexual violence and sexual harassment between children in schools and colleges (DfE, May 2018);
- 1.5.14 Searching, screening and confiscation: advice for schools (DfE, January 2018);
- 1.5.15 Listening to and involving children and young people (DfE, January 2014);
- 1.5.16 Strategy for dealing with safeguarding issues in charities (Charity Commission, December 2017);
- 1.5.17 Regulatory alert to charities - safeguarding (Charity Commission, December 2017);
- 1.5.18 How to report a serious incident in your charity (Charity Commission, June 2019);

- 1.5.19 Report serious wrongdoing at a charity as a worker or volunteer (Charity Commission, October 2018);
 - 1.5.20 Safeguarding children and protecting professionals in early years settings: online safety considerations (UK Council for Internet Safety, February 2019);
 - 1.5.21 Relationships education, relationships and sex education and health education guidance (DfE, June 2019); and
 - 1.5.22 Cambridgeshire & Peterborough Safeguarding Children Partnership Board.
- 1.6 The following policies, procedures and resource materials are also relevant to the School's safeguarding practices:
- 1.6.1 Anti-Bullying Policy
 - 1.6.2 Data Protection and Retention Policy
 - 1.6.3 Drugs and Substance Misuse Policy
 - 1.6.4 Educational Visits Policy
 - 1.6.5 First Aid Policy
 - 1.6.6 Health and Safety Manual
 - 1.6.7 Intimate Care Policy
 - 1.6.8 Missing Child Policy
 - 1.6.9 Online Safety Policy
 - 1.6.10 Personal, Social, Health and Citizenship Education (PSHCE)
 - 1.6.11 Policy for Good Discipline
 - 1.6.12 Preventing Extremism and Radicalisation Policy
 - 1.6.13 Risk Assessment Policy for Pupil Welfare
 - 1.6.14 Safer Recruitment Policy
 - 1.6.15 Special Educational Needs and Disabilities (SEND) Policy
 - 1.6.16 Staff Code of Conduct
 - 1.6.17 Visitors and Site Security Policy
 - 1.6.18 Whistleblowing Policy
- 1.7 These policies and procedures are available to staff on the School Portal and hard copies are available upon request from the School Office.

- 1.8 This policy has been authorised by the Governors, is available to parents on request and is published on the School website. It is also available for inspection from the School Office during the School day. This policy can be made available in large print or other accessible format if required. It applies wherever staff or Governors are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit. It applies to core School activities and to out of hours and commercial activities (see 1.11 below). It is a whole school policy and applies to the Early Years Foundation Stage (EYFS) provision.
- 1.9 This policy covers the King’s College Choir Choristers for the time they are in school, in Chapel or College, at concerts and on choir tours in the UK and abroad.
- 1.10 Reference to **staff** includes any employee, peripatetic teacher or volunteer who undertakes regulated activity and is, therefore, on our Single Central Register of Appointment.
- 1.11 Commercial activities refers to external groups who hire any part of the School site. Prior to any booking confirmation, all external groups will be required to produce a copy of their current safeguarding policy and risk assessment, confirm the identity of their Designated Safeguarding Lead and produce evidence of DBS checks for their group leaders.

2 Definition of Safeguarding

- 2.1 **Safeguarding** is the protection of people from harm.
- 2.2 **Safeguarding and promoting the welfare of children** means (as set out in KCSIE and WT):
- 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 ensure all children have the best outcomes.

3 Types of Abuse

- 3.1 Abuse is a form of maltreatment and can be:
- physical abuse;
 - emotional abuse;
 - sexual abuse;
 - neglect.
- 3.2 Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- 3.3 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and / or alcohol misuse, deliberately missing education, and consensual and non-consensual sharing of indecent images and / or videos can be

signs that children are at risk. Please see Appendix 1 for explanations of the types of abuse and possible signs of abuse together with details about specific safeguarding issues. The child protection training provided to staff considers the types and signs of abuse staff should be aware of.

4 Safeguarding Principles

- 4.1 The School will take reasonable steps to promote the welfare of its pupils and others who come into contact with the School and to ensure that its pupils and others who come into contact with the School do not, as a result, come to harm or are exposed to abuse.
- 4.2 The School will:
- 4.2.1 Arrange appropriate induction and refresher training on safeguarding for all staff at a level commensurate with their role;
 - 4.2.2 Consult with staff about safeguarding issues and encourage a culture which promotes positive behaviour and the reporting of any safeguarding concerns;
 - 4.2.3 Have appropriate safeguarding policies and procedures, which are fit for purpose, reviewed at least annually and published on its website as appropriate;
 - 4.2.4 Check staff are suitable to act in their roles by:
 - (i) sharing this policy with applicants at the recruitment stage;
 - (ii) undertaking appropriate checks on all staff to ensure an individual's suitability for their role.
 - 4.2.5 Undertake appropriate due diligence checks of third parties and enter into appropriate agreements with them covering the relationship, their respective roles and monitoring and reporting requirements;
 - 4.2.6 Review its premises, security arrangements and arrangements for third party use to minimise safeguarding risks;
 - 4.2.7 Be mindful of the different risks for staff and beneficiaries who are overseas and have suitable reporting and monitoring processes in place for any work overseas;
 - 4.2.8 Actively promote and encourage the reporting of safeguarding concerns, train staff to identify them and to refer or report them (and have a clear system for doing so);
 - 4.2.9 Be quick to respond to concerns and carry out appropriate investigations;
 - 4.2.10 Manage conflicts of interest and / or loyalty;
 - 4.2.11 Encourage effective working relationships with third party agencies which manage safeguarding concerns. This includes being aware of, and complying with, the published arrangements set out by the local safeguarding partners;
 - 4.2.12 Set out risks and how it will manage them in a risk register;

4.2.13 Allocate sufficient funds for the effective management of safeguarding; and

4.2.14 Arrange appropriate insurance cover for staff and volunteers and the activities involved.

4.3 Any safeguarding concern raised by any person, including those involved or participating in a commercial activity, will be taken seriously and action taken in accordance with the relevant School policies and procedures.

5 Specific Safeguarding Duties in Relation to Children

5.1 Safeguarding and promoting the welfare of children is everyone's responsibility. Every pupil should feel safe and protected from any form of abuse and neglect (see Appendix 1 for types and signs of abuse).

5.2 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people and expects all staff to share this commitment.

5.3 The School will:

- ensure that we practise safer recruitment in checking the suitability of staff, including staff employed by another organisation, to work with children and young people in accordance with the guidance given in KCSIE, WT, the Education (Independent School Standards) (England) Regulations 2014 (SI 2014/3283), the National Minimum Standards for Boarding Schools and the Statutory Framework for the Early Years Foundation Stage including ensuring appropriate DBS and reference checks are undertaken according to the government regulations and in line with the School's *Safer Recruitment Policy*;
- Staff connected to the School's early years and later years provisions are under an ongoing duty to inform the School if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's separate *Safer Recruitment Policy* for further details about this duty and to their contract of employment in respect of their ongoing duty to update the School;
- ensure that the School maintains a Single Central Register of Appointment for all staff;
- ensure that visiting speakers are suitable and appropriately supervised is set out in the School's separate *Visiting Speaker Policy*;
- contact previous education settings of children to request that any child protection records are passed on to the School;
- follow the local inter-agency procedures of the Cambridgeshire & Peterborough Safeguarding Children Partnership Board;
- protect each pupil from any form of abuse, whether from an adult or another pupil;
- be alert to signs of abuse both in the School and from outside;
- include opportunities within the curriculum for children to develop the skills they need to recognise and stay safe from abuse;

- deal appropriately with every suspicion or complaint of abuse;
- design and operate procedures which promote this policy;
- design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false, unsubstantiated or unfounded allegations;
- support children who have been abused in accordance with appropriate education, child protection and / or welfare plans;
- be alert to the medical needs of children with physical or mental health conditions, special educational needs or disabilities, where additional barriers can exist when detecting abuse or neglect;
- operate robust and sensible health and safety procedures;
- take all practicable steps to ensure that School premises are as secure as circumstances permit;
- operate clear and supportive policies on drugs, alcohol and substance misuse as per the School's *Drug and Substance Misuse Policy*;
- teach pupils about safeguarding, for example through use of online resources and through the curriculum and PSHCE;
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in the local area;
- encourage a culture of listening to students and taking account of their wishes and feelings in any measure put in place by the School to protect them;
- prepare staff to identify children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WT;
- assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area; and
- identify pupils who may be vulnerable to radicalisation and know what to do when they are identified in accordance with the School's *Preventing Extremism and Radicalisation Policy*.

6 Contextual Safeguarding

- 6.1 Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School.
- 6.2 All staff, but especially the Designated Safeguarding Lead, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

6.3 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

7 The Designated Safeguarding Lead

7.1 DSL means the School's Designated Safeguarding Lead.

7.2 The School Governors have appointed Mr J Rist, Deputy Head, as the DSL who has the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the School. The DSL has the time, funding, training resources and support to enable him 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. The DSL receives focused training to support learning and understanding of the ever-changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation.

7.3 The main responsibilities of the DSL are set out in Appendix 3.

7.4 Mrs Alison Gelling, School Nurse, has been appointed as the Deputy DSL; Mrs Helen Williams, Year 6 Form Tutor, has been appointed as a Designated Person. They are able to carry out the activities of the DSL if he is unavailable.

7.5 Parents are welcome to approach the DSL, Deputy or Designated Person if they have any concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's form tutor or the Head who will notify the DSL in accordance with these procedures.

7.6 The DSL, Deputy and Designated Person may be contacted on their mobile telephones in relation to any safeguarding concerns out of School hours.

8 Duty of Staff

8.1 All staff have a duty:

- to protect children from abuse;
- to be aware of the School's child protection procedures in this policy and guidance issued by the School and to follow them;
- to know how to access and implement these procedures, independently, if necessary;
- to keep a sufficient record of any concerns, discussions and decisions in accordance with this policy;
- to report any matters of concern they may have about the safety and / or wellbeing of pupils;
- to report any safeguarding concerns about staff or anyone else associated with the School;
- to report any concerns they may have about the safety and / or wellbeing of other persons associated with the School; and

- to follow-up on any such reports to ensure that appropriate action is or has been taken.

8.2 The School recognises its duties to children in need and children at risk of harm.

8.3 The Governors ensure that:

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

8.3.2 the School's safeguarding arrangements take into account the procedures and practices of the Cambridgeshire & Peterborough Safeguarding Children Partnership Board, including understanding and reflecting local protocols for assessment and the referral threshold document; and

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

8.4 The Governors have nominated one of its members to take leadership responsibility for the School's safeguarding arrangements. See Key Contacts for contact details.

8.5 The DSL will be appointed by the Governors to promote the educational achievement of children who are looked after. The Governors will ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe. In particular they will ensure that staff have the information they need in relation to the child's looked after status, their care arrangements and that the levels of authority delegated to the carer by the authority looking after the child is made available to them.

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

9 Training

9.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

9.2 The level and frequency of training depends on role of the individual member of staff.

9.3 The School maintains written records of all staff training.

9.4 All training will be carried out in accordance with Cambridgeshire & Peterborough Safeguarding Children Partnership Board procedures.

9.5 Induction

9.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant, includes the provision of copies of):

- this policy;

- the Staff Handbook;
- the *Whistleblowing Policy* and *Online Safety Policy*;
- the *Staff Code of Conduct* (which gives guidance to staff to enable them to make sure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil (for example conveying a pupil by car, engagement in inappropriate electronic communication with a pupil, and so on));
- the *Policy for Good Discipline* for pupils and *Acceptable Use of ICT for Pupils Policy*;
- the role, identity and contact details of the DSL, Deputy DSL and Designated Person;
- a copy of Part 1 and, where appropriate, Annex B of KCSIE;
- the safeguarding response to children who go missing from education;
- the School's approach to online safety;
- safeguarding training in accordance with Cambridgeshire & Peterborough Safeguarding Children Partnership Board procedures including guidance on managing a report of peer-on-peer harmful sexual behaviour; and
- appropriate Prevent duty training.

9.6 Child Protection Training

- 9.6.1 All staff, including the Head, will receive a copy of this policy, Part 1 and, where appropriate, Annex B of KCSIE and will be required to confirm that they have read and understand these.
- 9.6.2 The Head and all staff members will undertake appropriate child protection training which will be updated every year, and following consultation with the Cambridgeshire & Peterborough Safeguarding Children Partnership Board. In addition, all staff members will receive safeguarding and child protection updates via email and staff meetings on a regular basis and at least annually.
- 9.6.3 All members of the Senior Leadership Team and DSL will undertake the online awareness training module on Prevent provided by the Home Office. The training is an introduction to the Prevent Duty and how it aims to safeguard vulnerable people from being radicalised to supporting terrorism or becoming terrorists themselves.
- 9.6.4 Staff development training will also include training on online safety and Prevent duty training assessed as appropriate for them by the School. Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child sexual exploitation, female genital mutilation, cyber bullying, prejudice-based bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

- 9.6.5 All Governors receive safeguarding training on induction. The Nominated Safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities.
- 9.6.6 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant skills, knowledge and experience to safeguard children effectively, including staff meetings and professional development reviews. This includes information on how staff can report concerns occurring out of hours / out of term time.
- 9.6.7 **DSL, Deputy DSL and Designated Person**
- 9.6.8 The DSL, Deputy DSL and Designated Person will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years.
- 9.6.9 In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, Deputy DSL and Designated Person, see Appendix 3.
- 9.6.10 Prevent duty training will be consistent with Home Office Workshop to Raise Awareness of Prevent (WRAP) training if available.
- 9.6.11 **Teaching Pupils about Safeguarding**
- (i) The School teaches pupils about safeguarding through the curriculum and PSHCE, including guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.
 - (ii) Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment through the provision of Relationships Education (Reception – Year 6) and Relationships and Sex Education (Years 7 and 8) which is delivered via PSHCE lessons appropriate to pupils' age and stage of development.
 - (iii) Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The School's complaints procedure for pupils is posted in classrooms and is detailed in the School's *Anti-Bullying Policy*. The procedure sets out what pupils should do if they have a worry or complaint.
 - (iv) The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. The School has appropriate filters and monitoring systems in place and the DSL receives a daily report of internet usage. The School is mindful that this should not lead to unnecessary restrictions on learning.

10 Reporting Obligations of Staff in Relation to Safeguarding

10.1 Reporting Obligations Generally

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

10.3 The procedures for fulfilling staff member's reporting duties are set out below. **If staff are ever unsure about the appropriate process to use, they should not hesitate to speak to the DSL, Senior Leadership Team or directly to children's social care or police in their absence for guidance.**

10.4 What to do if staff have a concern about a pupil:

10.4.1 If staff have **any concern about a pupil's welfare**, they should report their concern to the DSL (or the Deputy DSL or Designated Person in the DSL's absence) **immediately**. The contact details of the DSL, Deputy DSL and Designated Person are set out in the contacts list at the front of this policy. See Appendix 2 for guidance about what to do when receiving a disclosure and recording a concern.

10.4.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

10.4.3 Teachers must report known cases of female genital mutilation (**FGM**) to the police. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

10.4.4 If the concern involves an allegation against a member of staff, this must be reported in accordance with the procedures set out in Appendix 4.

10.5 What if the DSL is unavailable?

10.5.1 The DSL, Deputy DSL or Designated Person should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of School hours.

10.5.2 If in exceptional circumstances the DSL, Deputy DSL or Designated Person are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the Senior Leadership Team and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.

10.5.3 Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and / or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 13 below for further details on making a referral.

10.5.4 Any action taken by a member of staff pursuant to this requirement should then be shared with DSL, Deputy DSL or Designated Person, or a member of the Senior Leadership Team, as soon as is practically possible.

10.6 Action by the DSL

10.6.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Cambridgeshire & Peterborough Safeguarding Children Partnership Board procedures and referral threshold document. Such action may include:

- (i) managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from children's social care where required (see 11 above);
- (ii) an early help assessment (see 12 below); or
- (iii) a referral for statutory services (see 13 below).

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

10.6.3 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

11 Managing Support for Pupils Internally

11.1 The School has a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified. See section 22 below and the School's *Risk Assessment Policy for Pupil Welfare*.

12 Early Help

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

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

12.2.1 is disabled and has specific additional needs;

12.2.2 has special educational needs (whether or not they have a statutory education, health and care plan);

12.2.3 is a young carer;

12.2.4 is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;

- 12.2.5 is frequently missing / goes missing from care or from home;
- 12.2.6 is at risk of modern slavery, trafficking or exploitation;
- 12.2.7 is at risk of being radicalised or exploited;
- 12.2.8 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- 12.2.9 is misusing drugs or alcohol themselves;
- 12.2.10 is looked after or has returned home to their family from care;
- 12.2.11 is a privately fostered child.

- 12.3 A member of staff who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Cambridgeshire & Peterborough Safeguarding Children Partnership Board referral threshold document and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- 12.4 If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases School staff may be required to take a lead role.
- 12.5 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.

13 Making a Referral

- 13.1 **Where a child is suffering, or is likely to suffer from harm, a referral should be made to children's social care (and if appropriate the police) immediately.** The relevant contact information is set out at the front of this policy.
- 13.2 **Statutory Assessments**
- 13.3 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:
 - 13.3.1 **Children in need:** *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.* Children in need may be assessed under section 17 of the Children Act 1989.
 - 13.3.2 **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm.*

- 13.4 Staff required to make a direct referral may find helpful the flowchart set out on page 23 of KCSIE and the flowcharts set out in Chapter 1 of WT for information about the likely actions and decisions required.
- 13.5 Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
- 13.5.1 personal details of the child including the child's developmental needs;
 - 13.5.2 detailed information about the concern;
 - 13.5.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.
- 13.6 If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.
- 13.7 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.
- 13.8 If after a referral the pupil's situation does not appear to be improving, local escalation procedures should be followed to ensure the concerns are addressed and that the pupil's situation improves. Further details about local escalation procedures are held with the DSL.
- 13.9 In the case of a 'Prevent' referral being required, the Prevent Lead (Mr J Rist, who is also the School's DSL) will make a referral to the Multi-Agency Safeguarding Hub (MASH).

14 Allegations Against Staff

- 14.1 The School has procedures for dealing with allegations against staff:
- 14.1.1 The procedures in this policy apply to staff who pose a risk of harm to children and aim to strike a balance between the need to protect children from abuse and the need to protect staff from false, malicious, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 4 and follow Part 4 of KCSIE.
 - 14.1.2 The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.
- 14.2 The child protection officer appointed by Social Services, and the Designated Officer(s) should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria set out in Appendix 4 or that are made directly with the police.
- 14.3 **Staff guidance:** Detailed guidance is given to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with students, parents, colleagues and any other person who comes into contact with the School. This guidance is contained in the *Staff Code of Conduct* and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

14.4 **Whistleblowing:** Staff and volunteers should also feel able to follow the School's separate *Whistleblowing Policy* to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities, and that such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the School's local authority or to the Charity Commission if they consider that the School has failed to deal with concerns appropriately.

15 Allegations Against Pupils - Peer on Peer Abuse

15.1 Allegations against pupils should be reported in accordance with the procedures set out in this Policy. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

15.2 A pupil against whom an allegation of abuse has been made may be excluded from the School as a neutral measure during the investigation and the School's *Expulsion, Removal and Review Policy* will apply. The School will take advice from children's social care and / or the police, as appropriate, on when and how to inform the pupil and his / her parents about the allegations and how the investigation of such allegations will be conducted. The School will carry out risk assessments and take all appropriate action to ensure the safety and welfare and continued education of all pupils involved including the pupil or pupils accused of abuse.

15.3 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the relevant agencies, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's education guardian will be requested to provide support to the pupil and to accommodate them if it is necessary to exclude them as a neutral measure during the investigation.

15.4 Where an allegation is made against a pupil, all those involved will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

15.5 Missing Child Procedures

15.5.1 All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any pupil missing from the School. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing. Please see the School's separate *Missing Child Policy* for further details.

15.6 Boarders and Choristers

15.6.1 Boarders and Choristers have access to an independent listener and are provided with a range of helplines and contact numbers, including the Children's Commissioner, to contact in case of problems or distress. These contact numbers

are given to boarders to keep in their bedside cabinets and are also posted on the noticeboard in the Boarding House.

16 Informing Parents

- 16.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, children's social care, the police and / or the pupil before discussing details with parents.
- 16.2 In all cases, the DSL will be guided by the Cambridgeshire & Peterborough Safeguarding Children Partnership Board referral threshold document.
- 16.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

17 Additional Reporting

- 17.1 In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

17.1.1 Health and Safety Executive

- (i) The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's *Health and Safety Manual* for further details about this.

17.1.2 Charity Commission

- (i) The School is a registered charity and is required to report all serious incidents to the Charity Commission promptly in accordance with the guidance "How to report a serious incident in your charity" (Charity Commission, June 2019).
- (ii) Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving students. This is likely to involve the following:
- (A) Pupils or other beneficiaries have been, or are alleged to have been, abused or mistreated while under the care of the School or by someone connected with the School, for example a Governor, staff member or volunteer;
- (B) There has been an incident involving the abuse or mistreatment (alleged or actual) of someone who has come into contact with the School, through its work, which has resulted in or risks significant harm, and this is connected with the activities of the School;
- (C) There has been a breach of the School's procedures or policies which has put pupils or others who come into contact with it at risk of significant harm, including failure to carry out checks which would

have identified that a person is disqualified in law, under safeguarding legislation, from working with children or otherwise disqualified from holding their position.

- (iii) The School will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy.
- (iv) The School will tell the Charity Commission what action it has taken or is planning to take at the time of reporting a serious incident, including the immediate management of the incident and any wider review or lessons learned exercise.

17.1.3 Disclosure and Barring Service (DBS)

- (i) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4 for further details.

17.1.4 Teaching Regulation Agency (TRA)

- (i) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed or would have been dismissed if they had not resigned. See Appendix 4 for more details.

17.1.5 Insurers

- (i) The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- (ii) Care should be taken to ensure this is done before renewal to ensure that the school complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

18 Secure School Premises

- 18.1 **School Premises:** The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.
- 18.2 **Visitors:** All visitors to the School site register at the School Office. All visitors, including parents and guardians, must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises.
- 18.3 **Boarding House:** All visitors (including parents, legal guardians and education guardians of boarders and choristers) to the Boarding House must sign in during the normal School day in accordance with clause 18.2 above. Outside of the normal school day, all visitors must report to the duty member of staff immediately on arrival, and must observe the necessity to be kept under sufficient staff supervision during their visit. Parents, legal guardians and education guardians of

boarders are expected to notify the Housemaster or member of staff on duty that they are visiting, however, they are not required to be kept under staff supervision during their visits, unless a court order requires such supervision. Parents of boarders and choristers must respect the visiting times as set out by the Housemaster from time to time.

19 Use of Mobile Technology and Online Safety

- 19.1 The School's policy on the use of mobile technology, including phones and cameras in the School may be found in the *Acceptable Use of ICT for Pupils Policy*, *Online Safety Policy* and the *Staff Handbook*, and is as follows:
- 19.2 **Staff:** All mobile devices are to be switched off or set to silent mode and kept out of sight during any contact time with the children EXCEPT when a member of staff is on duty, in which case they should carry their mobile device with them in the event of needing to summon assistance. Staff should use School devices whenever possible in taking photographs or video of pupils. Use of personal mobile phones, cameras or other personal mobile devices for taking photographs of the children should be limited and only with prior agreement from the Head or DSL. Images on a personal device should be uploaded to the School drive and deleted from the personal device as soon as practicable.
- 19.3 **Children:** Please see the School's separate *Acceptable Use of ICT for Pupils Policy* and *Online Safety Policy* for pupils which includes guidance on the use of cameras and mobile phones. In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises.
- 19.4 **Parents:** Parents (including parents of pupils in the EYFS setting) may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
- 19.5 The School does not allow access to the internet onsite for pupils' personal use. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage. The School's approach to online safety is set out in the School's *Online Safety Policy*.

20 Recordkeeping

- 20.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.
- 20.2 The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data for the benefit of pupils and parents. The privacy notices are published on the School's website. In addition, staff must ensure that they follow the School's data protection procedures when handling personal data created in connection with this policy. In certain circumstances, the DSL may share personal information with a third party without parent or guardian consent.
- 20.3 All records created in accordance with this policy are managed in accordance with the School's *Data Protection and Retention Policy*.

20.4 Insofar as pupil records are concerned:

20.4.1 Staff must record all concerns about a pupil through MyConcern. Guidance on recordkeeping is set out in Appendix 2.

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

21 Information Sharing and Multi-Agency Working

21.1 The School will treat all child protection records with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of children.

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

21.3 The School understands its pivotal role in multi-agency safeguarding and will make arrangements to work together and co-operate with the three local safeguarding partners (Local Authority, clinical commissioning group and the police) to ensure that all relevant information is shared for the purposes of early help assessments and child protection investigations under section 47 of the Children Act 1989.

21.4 **Allegations against staff:** Where allegations have been made against staff, the School will consult with the Designated Officer(s) and, where appropriate, the police and social services to agree the information that should be disclosed and to whom.

21.5 While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

21.6 When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the GDPR and Data Protection Act 2018. The School will also have regard to its data protection procedures. The School Bursar will work with the DSL as appropriate to determine what should be disclosed.

22 Risk Assessment

22.1 Where a concern about a student's welfare is identified, the risks to that student's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

22.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual student welfare plans (such as

behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting student welfare will be systematic and student focused.

- 22.3 The Head has overall responsibility for ensuring that matters which affect student welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.
- 22.4 Day-to-day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

23 Monitoring and Review

- 23.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary and seeking contributions from staff. The DSL will update the Senior Leadership Team regularly on the operation of the School's safeguarding arrangements.
- 23.2 Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the School Governors. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.
- 23.3 The School Governors will commission a report to undertake a review of this policy and the School's safeguarding procedures annually. This will include an update and review of the effectiveness of procedures and their implementation and the effectiveness of multi-agency working.
- 23.4 The DSL will work with the Nominated Safeguarding Governor, preparing a report commissioned by the Governors. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Governing Body should also consider independent corroboration, such as:
 - 1.2.2 inspection of records or feedback from external agencies including the Designated Officers;
 - 1.2.3 reports of ISI inspections;
 - 1.2.4 the outcome of any relevant complaints, claims or related proceedings; and
 - 1.2.5 press reports.
- 23.5 The full Governing Body will review the report, this policy and the implementation of its procedures, including good cooperation with local agencies, and consider the proposed amendments to the policy, from both the DSL and its own members, before giving the revised policy its final approval. Detailed minutes recording the review by the Governing Body will be made.
- 23.6

Signed:

The Reverend Dr Stephen Cherry
Dean, King's College, Cambridge
Chair of Governors, King's College School

21st September 2021



Date of Last Review:	September 2021
Date for Next Review:	September 2022
Policy Owner:	Head / DSL
Authorisation:	Chair of Governors, On behalf of the Board of Governors

Appendix 1 Types and Signs of Abuse and Specific Safeguarding Issues

Types of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Part 1 of KCSIE defines the following indicators of abuse and neglect, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.

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

Emotional Abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs of Abuse

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

- the pupil says they have been abused or asks a question or makes a comment which gives rise to that inference;
- there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
- the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour or there is a sudden or significant change in the pupil's behaviour;
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;
- the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- the pupil is reluctant to go home, or has been openly rejected by their parents or carers; and
- inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

The Cambridgeshire & Peterborough Safeguarding Children Partnership Board can provide advice on the signs of abuse and the DfE Advice "what to do if you're worried a child is being abused (March 2015)" provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

Specific Safeguarding Issues

Statutory guidance acknowledges the following as specific safeguarding issues:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Consensual and non-consensual sharing of indecent images and upskirting
- County Lines
- Domestic abuse
- Homelessness
- Honour-based abuse
- Mental health

- Preventing radicalisation and Channel
- Peer on peer / children on children abuse
- Sexual violence and sexual harassment between children (see below)

Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE 2021. Staff should be particularly aware of the safeguarding issues set out below.

Children Missing Education

Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding issues. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

Where reasonably possible the School will hold more than one emergency contact for each pupil.

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

This will assist the local authority to:

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

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

- fails to attend School regularly; or
- has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

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

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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. 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. In some cases, the abuse will also be in exchange for something the victim needs or wants and /

or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and / or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and / or take place online.

County Lines

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

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

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation.

Domestic Abuse

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable support to be given to the child according to their needs.

Honour-Based Abuse

All forms of so-called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Female Genital Mutilation (FGM)

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

There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM](#) (HM Government, April 2016) (pages 59-61 focus on the role of schools).

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

If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance [Mandatory Reporting of Female Genital Mutilation - procedural information](#) (December 2016) for further details about the duty.

Guidance published by the [Department for Health](#) also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

Breast Ironing

Breast ironing, also known as breast flattening, is the process whereby young pubescent girls' breasts are ironed, massaged and / or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and, therefore, be kept in education longer.

Breast ironing is a harmful cultural practice, much like female genital mutilation, and is child abuse. All staff must be able to identify the signs and symptoms of girls who are at risk of or have undergone Breast ironing and should report any concerns to the DSL immediately.

Forced Marriage

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

Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the [Multi-agency guidelines: Handling case of forced marriage](#) (HM Government, June 2014).

Staff should speak to the DSL if they have any concerns. Pages 32-36 of the [Multi-agency guidelines: Handling case of forced marriage](#) (HM Government, June 2014) focus on the role of schools in detecting and reporting forced marriage and the Forced marriage Unit can be contacted on 020 7008 0151 or fmua@fco.gov.uk for advice and information.

Mental Health

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

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

Where children have suffered abuse and neglect, or 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.

All staff are asked to monitor the mental health of pupils. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the School's safeguarding procedures and the DSL should be notified.

Radicalisation, the Prevent Duty and Channel

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

The School aims to build pupil's resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can

popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and learn how to challenge these ideas. The Prevent duty is not intended to limit discussion of these issues. Schools should, however, be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political views.

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

- **Extremism:** *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"*
- **Radicalisation:** *"the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."*
- **Terrorism:** *'an action that endangers or causes serious violence to a person / people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.'*

There is no single way of identifying an individual who is likely to be susceptible an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a referral to the Channel programme, having consulted Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, April 2015).

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

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referral to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. The DSL may be asked to attend the Channel panel to help with the assessment.

Peer on Peer Abuse

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

Safeguarding issues can manifest themselves via peer-on-peer abuse. This includes, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi-nudes images and / or videos;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
- initiation / hazing type violence and rituals.

The School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Sexual violence and sexual harassment can occur online and offline (both physical and verbal). Like all peer-on-peer abuse, sexual violence and sexual harassment are never acceptable and will be taken seriously. See also **Sexual violence and sexual harassment between children** below.

The School takes steps to minimise the risk of all types of peer-on-peer abuse. The School has robust anti-bullying procedures in place (see the School's *Anti-Bullying Policy*) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including risks arising from behaviour in the boarding house and the particular vulnerabilities of those with a special educational need or disability (see the School's *Risk Assessment Policy for Pupil Welfare*).

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

Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment can occur between two or more children of any age or sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The School will respond to allegations seriously and all victims will be offered appropriate support.

The School is aware of the importance of:

- making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and committing / attempting to commit certain acts of voyeurism e.g. upskirting. Dismissing or tolerating such behaviours risks normalising them.

References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault. It is important that staff and pupils understand 'consent' in the context of sexual violence; pupils in Years 7 and 8 are taught about consent in PSHCE lessons.

References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child-on-child sexual harassment, it 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.

While not intended to be an exhaustive list, some examples of sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual 'jokes' or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone or part of a wider pattern of sexual harassment and / or sexual violence. It may include:
 - consensual and non-consensual sharing of nudes and semi-nudes images and / or videos. As set out in the [UK Council for Internet Safety \(UKCIS\) Guidance: Sharing of nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
 - sharing of unwanted explicit content;
 - upskirting;
 - sexualised online bullying;

- unwanted sexual comments and messages, including on social media;
- sexual exploitation – coercion and threats.

The DfE guidance Sexual violence and sexual harassment between children in schools and colleges (September 2021) provides further detailed advice.

Sexual Imagery and Upskirting

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, but children need to know it is still illegal. Non-consensual sharing is illegal and abusive. UKCIS provides further detailed advice.

Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing parts of their body or clothing, not otherwise visible, to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

As per UKCIS advice, members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of shared sexual images, members of staff should describe the content of the images as reported to them.

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

- a) it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
- b) it is necessary to report the image to a website or agency to have it taken down; or
- c) a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

Where viewing an image is unavoidable:

- a) viewing should take place on School premises wherever possible;
- b) the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- c) a senior member of staff should be present to monitor and support the person viewing the image. This member of staff does not need to view the image;

- d) full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
- e) any member of staff who views an indecent image should be given appropriate support.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

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

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

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

Special Educational Needs and Disabilities

The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's *Special Educational Needs and Disabilities (SEND) Policy*.

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

- a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;
- b) pupils with a special educational need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and
- c) there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

Children who need a social worker

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can

leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

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

Looked After Children

The Governors ensure that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

- a) whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
- b) contact arrangements with birth parents or those with parental responsibility;
- c) information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL maintains these details, including contact details of the child's social worker. See Appendix 3 for the DSL's role in relation to pupils who are looked after children.

Care Leavers

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

Appendix 2 Concerns About a child - Guidance for Staff

1 Receiving a Disclosure

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, i.e. a question which suggests its own answer.
- 1.3 Reassure the pupil but not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.
- 1.4 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.5 Pass on the record when reporting the concern in accordance with this policy.

Remember that a victim may not make a direct report; a friend may make a report or a member of staff may overhear a conversation. In all cases, staff should act on concerns immediately rather than wait to be told.

2 Recording a Concern

- 2.1 Staff must record all concerns in writing as soon as possible after the disclosure.
- 2.2 Records should be factual and should include:
 - 2.2.1 the pupil's details: name; date of birth; address and family details;
 - 2.2.2 date and time of the event / concern / conversation;
 - 2.2.3 the action taken and by whom;
 - 2.2.4 the name and position of the person making the record.
- 2.3 The School uses MyConcern software to record concerns digitally, for which staff receive training. Paper copies can also be found in the staff room, from the DSL or downloaded from the School Portal. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

3 Receiving a Report of Harmful Sexual Behaviour

- 3.1 Additional guidance about how to manage a report of harmful sexual behaviour is provided in Part 5 KCSIE. This includes the following advice:
- 3.2 Only record the facts as the child presents them.
- 3.3 Where the report includes an online element, do not view or forward illegal images of a child. See Appendix 1 above and the [UKCIS](#) guidance regarding sexual imagery.
- 3.4 Manage reports with another member of staff present (preferably the DSL, Deputy DSL or Designated Person), if possible.
- 3.5 Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

4 **Use of Reasonable Force**

- 4.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed.
- 4.2 Staff should refer to the School's *Policy for Good Discipline* and the *Staff Code of Conduct* for more detailed guidance about the use of reasonable force.

Appendix 3 Responsibilities of the Designated Safeguarding Lead (DSL)

The name and contact details of the DSL and Deputy DSL are set out in the Key Contacts section at the front of this policy.

In accordance with Annex B of Keeping children safe in education, the main responsibilities of the DSL are:

Managing Referrals

The DSL is expected to:

- a) refer cases of suspected abuse to children's social care as required;
- b) support staff who make referrals to the local authority children's social care;
- c) refer cases to the Channel programme where there is a radicalisation concern as required;
- d) support staff who make referrals to the Channel programme;
- e) refer cases where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child to the Disclosure and Barring Service as required; and
- f) refer cases where a crime may have been committed to the Police as required.

Working with Others

The DSL is expected to:

- a) act as a point of contact with all safeguarding partners;
- b) liaise with the Head in respect of police investigations or ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- c) as required, liaise with the Case Manager (see Appendix 4) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- d) liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies; and
- e) act as a source of support, advice and expertise for staff.

Raise Awareness

The DSL should:

- a) ensure this policy is known, understood and used appropriately;
- b) ensure the School's child protection and safeguarding processes are known, understood and use appropriately;
- c) ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly and liaise with the Head and Governors regarding this;
- d) ensure this policy is available publicly;

- e) ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the School's role in this; and
- f) maintain links with the Cambridgeshire Safeguarding Children Partnership Board to ensure staff are aware of training opportunities and the local policies on safeguarding.

Child Protection File

- a) Where children leave the School ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file. The DSL is responsible for ensuring that reasonable steps are taken to effect secure transit and for obtaining confirmation of receipt from the new school or college.
- b) In addition, the DSL will consider if it is appropriate to share any information with the new school or college in advance of a child leaving.
- c) On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCO.

Preventing Radicalisation

In accordance with the Prevent Duty Guidance for England and Wales and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (HM Government, 2015) the DSL has the following responsibilities:

- (a) acting as the first point of contact for parents, pupils, teaching and support staff and external agencies in all matters relating to the Prevent Duty;
- (b) co-ordinating Prevent Duty procedures in the School;
- (c) undergoing appropriate training on the Prevent Duty such as the Home Office 'Workshop to Raise Awareness of Prevent' (**WRAP**) training;
- (d) undergoing appropriate training on the Channel programme;
- (e) assessing the training needs of all School staff in relation to the Prevent Duty and implementing and maintaining an ongoing training programme for staff including induction training for all newly appointed staff and volunteers;
- (f) maintaining an ongoing training programme on the Prevent Duty for all staff including induction training for all new employees and keeping records of staff training;
- (g) monitoring the keeping, confidentiality and storage of records in relation to the Prevent Duty;
- (h) liaising with local Prevent co-ordinators, the police and local authorities and existing multi-agency forums, including referrals to the Channel Police Practitioner and / or the police where indicated;

Training

The DSL, Deputy DSL and Designated Person have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will

be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- a) understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- b) have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- c) ensure each member of staff has access to and understands the School's *Safeguarding and Child Protection Policy* and procedures, especially new and part time staff;
- d) are alert to the specific needs of children in need, those with special educational needs and young carers;
- e) understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- f) understand the importance of information sharing, both within the school, and with all safeguarding partners / Cambridge & Peterborough Safeguarding Children Partnership Board, other agencies, organisations and practitioners;
- g) are able to keep detailed, accurate, secure written records of concerns and referrals;
- h) understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- i) are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;
- j) can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- k) obtain access to resources and attend any relevant or refresher training courses;
- l) encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them; and
- m) are able to take lead responsibility for students who are looked after children.

Appendix 4 Reporting Allegations Against Staff

The School's Procedures

The School has procedures for dealing with allegations against staff that aim to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations. These procedures will be used where the member of staff 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 would pose a risk of harm to children; and / or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All such allegations must be dealt with as a priority without delay. The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s)). The Designated Officer(s) will be informed immediately and in any event within one working day of all allegations that come to the School's attention and appear to meet the criteria set out above. These procedures will be applied with common sense and judgement.

Allegations of abuse against a teacher who is no longer teaching, and historical allegations of abuse, will be referred to the police.

Any allegations not meeting the above criteria will be dealt with according to the KCSIE guidance regarding low-level concerns. All low-level concerns are recorded and monitored by the School; should a pattern of behaviour be identified that subsequently meets the harms threshold as determined by the Head and DSL, the case will be dealt with according to the following procedures.

The School's values and expectations for behaviour are detailed in the *Staff Code of Conduct* and should be demonstrated and reinforced by all staff at all times.

Reporting an Allegation

The reporting requirements for allegations against a member of staff, the Head or Governor are set out below. In all cases, the member of staff making the allegation may consider discussing their concerns with the DSL and making a referral via the DSL. The only circumstances in which this would not be appropriate is if the allegation is against the DSL. Staff may also speak directly with the Head or the Chair of Governors.

Allegations against staff: Where an allegation or complaint is made against the DSL or any other member of staff, (other than the Head) the matter should be reported immediately to the Head or, in the Head's absence, the Chair of Governors. The allegation will be discussed immediately with

the Designated Officer(s) before further action is taken. Where appropriate, the Head will consult with the DSL.

Allegations against the Head: Where an allegation or complaint is made against the Head, the person receiving the allegation should immediately inform the Chair of Governors, or in their absence the Deputy Chair or the Nominated Safeguarding Governor, without first notifying the Head. Again, any such allegations will be discussed immediately with the Designated Officer(s) before further action is taken. The Chair of Governors will consult the Governor responsible for safeguarding, and vice versa.

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

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

The person taking action in accordance with the procedures in this Appendix is known as the "case manager".

Disclosure of Information

The case manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.

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

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

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

Further Action to be taken by the School

A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part 4 of KCSIE and the School's employment procedures.

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

Ceasing to Use Staff

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

When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the [DBS referral guidance](#).

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

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

Malicious Allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's *Policy for Good Discipline*. Where parents are dissatisfied with the procedures followed or decision of another agency, they should invoke that agency's complaints procedure as appropriate.

Where an allegation by a parent has been deliberately invented or been a malicious allegation the Head will consider (in accordance with the School's *Terms and Conditions*) whether to require that parent to withdraw their child or children from the school on the basis that they have treated the school or a member of staff unreasonably. Where parents are dissatisfied with the procedures followed or decision of another agency, they should invoke that agency's complaints procedure as appropriate.

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

Recordkeeping

Allegations that are found to be malicious will be removed from personnel records.

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

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

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

Appendix 5 Safeguarding During Remote Learning – COVID-19 (Updated September 2021)

While the School is currently open to all pupils, periodic lockdowns due to COVID-19 over the coming academic year remain a possibility. The School continues to follow all government guidance and will consult with the local health protection team, should there be an outbreak of infection at School. As such, the School remains ready to switch between its online learning platform and teaching on site at short notice should all or part of the School need to close to pupils due to advice from the government or health authorities.

During any period of full or partial lockdown of the School, the fundamental safeguarding principles, the School's relevant procedures and this policy remain intact and are summarised below:

- with regard to safeguarding, the best interest of children must always continue to come first;
- if any member of staff has a concern about any child, they should continue to act and act immediately;
- a Designated Safeguarding Lead, Deputy or Designated Person should always be available on site or via mobile phone;
- it is essential that unsuitable people are not allowed to enter the children's workforce and / or gain access to children; and
- children should continue to be protected while they are online.

The measures below seek to set out interim measures to ensure that any new processes in response to a switch to online learning are not weakening the School's collective approach to safeguarding or undermining the School's policy.

Supporting Children not in School

Pupils who are required to switch to online learning due to a full or partial School closure will continue to access the full School curriculum via the Home Learning Platform. Where the DSL has identified a pupil to be on the edge of social care support, or who would normally receive extra pastoral support in School, a robust communication plan will be put in place for that pupil. The plan will be reviewed regularly and where concerns arise the DSL will consider any referrals as appropriate.

Should a family choose to self-isolate and prefer their children to work remotely when not required to by the government or health authorities, they must seek prior permission from the Head. If permission is granted, the School will devise a plan for these pupils to access the curriculum remotely; specific communication procedures will be put in place and pupils' attendance and academic progress will be monitored closely.

The School recognises that being present in School is a protective factor for pupils and working from home can affect the mental health of pupils and their parents / carers. Staff are aware of this in setting expectations of pupils' work. The School will be proactive in its support of pupils with robust communication between teachers, the Senior Pastoral Team and parents. The School is prepared to offer extra help and / or School resources where necessary.

Vulnerable Children

The School will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers for looked-after or previously looked-after children. The School site is open to all vulnerable children or those who may be borderline vulnerable; the School will be proactive in offering supervision and support on site for these children. The lead for this is Mr J Rist.

Attendance Monitoring

For the duration of a full or partial School closure, the School will take attendance registers and complete the online Educational Setting Status form which gives the Department for Education daily updates on how many pupils and staff are attending.

For pupils working from home, teachers will keep a record of pupils' engagement with the curriculum via completed tasks or online lessons. Subject teachers will communicate with Form Tutors regarding pupil activity and inactivity during this time. Form Tutors will liaise with parents, if necessary, regarding any persistent lack of engagement by pupils and will work together with subject teachers to adjust the provision as necessary.

The School will continue to inform Children's Social Care if a child with a social worker does not attend school either in person or remotely.

Designated Safeguarding Lead

The School will have a trained DSL, Deputy DSL or Designated Person available either on-site or contactable via mobile phone at all times. Staff will be made aware of who that person is and how to contact them.

The DSL will continue to engage with social workers and attend all multi-agency meetings, which can be arranged remotely, if necessary.

Reporting a Concern

Where staff have a concern about a child, they should continue to follow the process outlined in this policy and log the concern via MyConcern.

Staff are reminded of the need to report any concern immediately and without delay.

If staff are not able to access MyConcern, they should report their concern directly to the DSL or Head; any concerns about the Head should be reported to the Chair of Governors.

Safeguarding Training and Induction

During any period of School closure, the DSL will continue to stay up to date with safeguarding developments through updates from the Education Safeguarding Team, accessing the Knowledge Hub, and via the Safeguarding Children Partnership Board communications and website.

All existing School staff have had their safeguarding training and have read Part 1 of Keeping Children Safe in Education (KCSIE) 2021. The DSL will communicate with staff any new local arrangements.

Where new staff are recruited or volunteers enter the School, they will continue to be provided with a safeguarding induction.

Safer Recruitment, Volunteers and Movement of Staff

It remains essential that people who are unsuitable not be allowed to enter the children's workforce or gain access to children. When recruiting new staff, the School will continue to follow the relevant safer recruitment procedures as set out in further detail in the School's *Safer Recruitment Policy*.

Should the School need to utilise volunteers due to a partial closure, it will continue to follow the internal risk assessment process. **Under no circumstances will a volunteer who has not been checked be left unsupervised or be allowed to work in regulated activity with children.**

The School will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as necessary.

It is essential from a safeguarding perspective that the School is aware on any given day, which staff or volunteers are present in the School and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the School will continue to keep the Single Central Register (SCR) up to date. All staff register their daily attendance on the School site.

Online Safety

During a period of remote learning, it is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk. Any such concerns should be reported immediately via MyConcern or directly to the DSL. Where appropriate, referrals should still be made to children's social care and, as required, the police.

Online Lessons

The School has developed procedures for staff, pupils and parents to follow for the period of remote learning, including the use of live webcams for lessons:

- All staff must use their School email address to communicate with pupils or parents (preferably via School Post) and all communications with pupils must be copied to parents;
- Teaching should be in groups only; not one to one with any pupil unless pre-approved by the DSL;
- Visiting Music Teachers and Learning Support Teachers delivering one-to-one lessons via online platforms must have the written consent from parents to do so and a parent or responsible adult (nominated by the parent) must be present for the duration of the lesson;
- A register should be taken and kept for records;
- Staff and pupils must wear appropriate clothing, as should anyone else in the household who may be on camera;
- Pupils should have webcams on unless otherwise directed by teachers;
- Sessions should not be recorded by staff, pupils or parents;

- Lessons should follow the normal school timetable, however, pupils should be dismissed slightly early to enable a screen break before joining their next lesson on time;
- Teachers should use School-approved laptops, not personal devices;
- Lessons should be broadcast in appropriate rooms with neutral backgrounds; and
- Language must be professional and appropriate, including any family members in the background.

The School will ensure the use of any online learning tools and systems is in line with privacy and data protection requirements.

Staff should ensure any visible account information used in virtual communication with pupils or parents (such as profile name or photo) is appropriately professional.