Safeguarding and Child Protection Policy

September 2024

Contents

Key School Contacts

Designated Safeguarding Lead ("DSL") – whole school including EYFS
Mr J Rist: Deputy Head
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 and Mental Health Lead
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.

Prevent Lead, Domestic Violence Lead, Online Safety Lead
Mr J Rist: Deputy Head
Telephone number: 01223 803995 or 01223 365814 ext. 260
Email: jrist@kcs.cambs.sch.uk

Key External Contacts

Education Safeguarding Team   ECPS.General@cambridgeshire.gov.uk

Early Help Hub   early.helphub@cambridgeshire.gov.uk
01480 376666

Local Authority Designated Officer   01223 727967 or 01223 727968
LADO@cambridgeshire.gov.uk

Cambridgeshire County Council Children's Social Care Team and Multi Agency Safeguarding Hub (MASH):

Telephone Number: 0345 045 5203
Monday to Thursday 8am – 5:30pm; Friday 8am-4:30pm

Out of Hours Emergency Duty Team: 01733 234724
outside the above hours and at weekends

Referral Forms:

https://safeguardingcambspeterborough.org.uk/concerned/

Cambridgeshire & Peterborough Safeguarding Children Partnership Board

http://www.safeguardingcambspeterborough.org.uk/children-board

Police
Emergencies   999
Child Abuse Investigation Unit   101
School's police liaison officer   101

Advice and Support about Extremism

Police   999
Non-emergency DfE advice   020 7340 7264 (Mon-Fri 9am to 6pm)
Counter-extremism@education.gsi.gov.uk

Reporting Female Genital Mutilation

Police Child Abuse Investigation Unit 101
Cambridgeshire County Council   01733 234724
Out of Hours Emergency Duty Team

NSPCC Whistleblowing Helpline

National Society for the Prevention of Cruelty to Children (NSPCC)
Weston House
42 Curtain Road
London EC2A 3NH

Tel: 0800 028 0285
help@nspcc.org.uk

NSPCC Support Line for Potential Victims of Sexual Harassment and Abuse in Educational Settings

Tel: 0800 136 663
Further guidance: https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/

UK Safer Internet Centre

Tel: 0344 381 4772
Email: helpline@saferinternet.org.uk

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

Email: whistleblowing@charitycommission.gsi.gov.uk

Cambridgeshire and Peterborough Mental Health Crisis Support

First Response Service   Tel: 111 and press option 2

1 Policy Aims

1.1 This is the *Safeguarding and Child Protection Policy* of King's College School, Cambridge ("the **School**").

1.2 The aims of this policy are as follows:

    1.2.1   to actively safeguard and promote the welfare of children, staff and others who come into contact with the School and protect them from harm;

    1.2.2   to actively promote the wellbeing of pupils;

    1.2.3   to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and allegations of abuse, neglect and / or exploitation;

    1.2.4   to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;

    1.2.5   to raise staff awareness about the School's safeguarding expectations;

    1.2.6   to raise awareness about how to report concerns and ensure they are appropriately investigated;

    1.2.7   to ensure staff are competent to carry out their safeguarding responsibilities and are supported in this role;

    1.2.8   to ensure consistent good safeguarding practice throughout the School to include the promotion of a zero tolerance approach to child-on-child sexual violence and sexual harassment in which pupils are confident to report it and staff are confident to identify and respond to it; and

    1.2.9   to promote a whole school culture of safety, equality and protection.

1.3 Every pupil should feel safe and protected from any form of abuse, neglect and exploitation.

1.4 All staff should understand the indicators of abuse, neglect and exploitation and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the School community are set out in Appendix 1.

1.5 Members of the School community (including alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively, and appropriate action taken.

1.6 Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively, and that appropriate action will be taken.

1.7 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of pupils underpins and is at the heart of all decisions, procedures and policies.

2　Scope and Application

2.1　This policy applies to the whole school including the Early Years Foundation Stage (EYFS) and the School's boarding provision.

2.2　This policy applies at all times including where pupils or staff are away from the School, whether they are on School organised activities or trips, and whether or not the School is open; it will, therefore, apply out of School hours and outside of term time.

2.3　This policy applies to core school activities and to out of hours and commercial activities.

2.4　Commercial activities refers to external groups who hire any part of the School site. Prior to any booking confirmation, all external groups are 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.

2.5　This policy covers the Choir of King's College, Cambridge choristers for the times they are in School, in Chapel or College, at concerts and on choir tours in the UK and abroad.

2.6　This policy is designed to address:

    2.6.1　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

    2.6.2　the specific statutory obligations on the School to safeguard and promote the welfare of children, as defined below.

3　Regulatory Framework

3.1　This policy has been prepared to meet the School's responsibilities under:

    3.1.1　Education (Independent School Standards) Regulations 2014;

    3.1.2　Boarding schools: national minimum standards (Department for Education (**DfE**), September 2022);

    3.1.3　Statutory framework for the Early Years Foundation Stage (DfE, September 2021);

    3.1.4　Education and Skills Act 2008;

    3.1.5　Childcare Act 2006;

    3.1.6　Children and Social Work Act 2017;

3.1.7   Data Protection Act 2018 and General Data Protection Regulation (**GDPR**);

3.1.8   Equality Act 2010; and

3.1.9   Charities Act 2011.

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

3.2.1   Keeping Children Safe in Education (DfE, September 2024) (KCSIE);

3.2.2   Working Together to Safeguard Children March (HM Government, updated July 2022) (WTSC);

3.2.3   Behaviour in schools: advice for headteachers and school staff (DfE, July 2022);

3.2.4   Disqualification under the Childcare Act 2006 (DfE, 31 August 2018);

3.2.5   Revised Prevent Duty Guidance for England and Wales (HM Government, updated April 2021);

3.2.6   Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (HM Government, February 2021);

3.2.7   Multi-agency statutory guidance on FGM (HM Government, updated July 2020);

3.2.8   What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);

3.2.9   Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018);

3.2.10   Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020);

3.2.11   Children missing education (DfE, September 2016);

3.2.12   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);

3.2.13   Sexual violence and sexual harassment between children in schools and colleges (DfE, September 2021);

3.2.14   Searching, screening and confiscation: advice for schools (DfE, July 2022);

3.2.15   Listening to and involving children and young people (DfE, January 2014);

3.2.16   Meeting digital and technology standards in schools and colleges (DfE, March 2023);

3.2.17   Safeguarding children (links to government guidance and resources);

3.2.18   Teaching online safety in schools (DfE, June 2023);

3.2.19   Harmful online challenges and online hoaxes (DfE, February 2021);

3.2.20 Safeguarding children and protecting professionals in early years settings: online safety considerations (UK Council for Internet Safety, February 2019);

3.2.21 Educate Against Hate (HM Government);

3.2.22 Strategy for dealing with safeguarding issues in charities (Charity Commission, December 2017);

3.2.23 Regulatory alert to charities - safeguarding (Charity Commission, December 2017);

3.2.24 Guidance on reporting safeguarding concerns in a charity (Department for Digital, Culture, Media and Sport, March 2022);

3.2.25 Reporting a serious incident in your charity when it involves a partner (Charity Commission, December 2019);

3.2.26 Relationships education, relationships and sex education and health education guidance (DfE, updated July 2020);

3.2.27 Cambridgeshire & Peterborough Safeguarding Partnership Board Threshold Document; and

3.2.28 PACE Code C 2019.

3.3 The following policies, procedures and resource materials are also relevant to the School's safeguarding practices:

3.3.1 Acceptable Use of ICT for Pupils Policy

3.3.2 Anti-Bullying Policy

3.3.3 Attendance and Missing Child Policy and Procedures

3.3.4 Data Protection and Retention Policy

3.3.5 Drugs and Substance Misuse Policy

3.3.6 Educational Visits Policy

3.3.7 First Aid Policy

3.3.8 Health and Safety Manual

3.3.9 Online Safety Policy

3.3.10 Personal, Social, Health and Economic Education (PSHE)

3.3.11 Policy for Good Discipline

3.3.12 Preventing Extremism and Radicalisation Policy

3.3.13 Risk Assessment Policy for Pupil Welfare

3.3.14 Safer Recruitment Policy

3.3.15 Special Educational Needs and Disabilities (SEND) Policy

3.3.16 Staff Code of Conduct

3.3.17 Visitors and Site Security Policy

3.3.18 Whistleblowing Policy

4   Publication and Availability

4.1   This policy has been published on the School's website; it is also accessible to parents and staff on the School Portal.

4.2   This policy is available in hard copy upon request.

4.3   A copy is available for inspection from the School Office during the school day.

5   Definitions

5.1   Where the following words or phrases are used in this policy:

5.1.1   References to **working days** mean Monday to Friday, when the School is open during term time. The dates of term are published on the School's website. If referrals to an external agency are required outside of term time, references to **working days** are to the days on which the relevant external agency is working.

5.1.2   **Safeguarding** is the protection of people from harm.

5.1.3   **Safeguarding and promoting the welfare of children** means (as set out in KCSIE and WTSC):

- Providing help and support to meet the needs of children as soon as problems emerge;

- Protecting children from maltreatment whether that is within or outside the home or online;

- Preventing impairment of children's mental and physical health or development;

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

- Taking action to enable all children to have the best outcomes.

5.1.4   Reference to **Local Safeguarding Partners** means the three safeguarding partners: local authority, Integrated Care Systems (ICSs) and the chief officer of police for an area any part of which falls within the local authority area who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children including identifying and responding to their needs.

5.1.5   References to **Children's Social Care** includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.

5.1.6   References to **Harmful Sexual Behaviour (HSB)** in this policy refer to the DfE's definition: problematic, abusive and violent sexual behaviours expressed by

children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.

5.1.7   **DSL** means the School's Designated Safeguarding Lead; references to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

5.1.8   Reference to **staff** includes any employee, peripatetic teacher, volunteer, or Governor who undertakes regulated activity and is, therefore, on our single central register of appointment.

5.1.9   **LADO** means designated officer at the local authority. The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaising with the three safeguarding partners.

6   Responsibilities - Safeguarding Leadership

6.1   The School Governors ('Governors') are responsible for safeguarding at the School.

6.2   The Governors have overall responsibility for all matters which are the subject of this policy including:

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

6.2.2   strategic leadership responsibility for the School's safeguarding arrangements; and

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

6.3   The Governors:

6.3.1   have nominated one of their number (Nominated Governor) to take leadership responsibility for the School's safeguarding arrangements. Contact details for the Nominated Governor are set out in the School contacts list at the front of this policy;

6.3.2   ensure that appropriate arrangements are in place to discharge their function including appropriate consideration of safeguarding matters at Governor meetings and a holistic annual review of safeguarding;

6.3.3   establish appropriate delegation arrangements at School level, led by the Head and DSL, to enable the School to discharge its safeguarding duties effectively;

6.3.4   ensure that all members of the Board of Governors receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance; and

6.3.5   ensure they discharge their legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have.

6.4 To ensure efficient discharge of its responsibilities under this policy, the Governors have allocated the following tasks:

Task	Allocation	Frequency
Keeping the policy up to date and compliant with the law and best practice.	DSL and School Bursar	As required
Monitoring the implementation of the policy, relevant risk assessments, and any action taken in response and evaluating effectiveness.	DSL	As required; termly at a minimum
Maintaining up to date records for all information created in relation to the policy and its implementation as required by the UK GDPR.	DSL and School Bursar	As required; termly at a minimum
Seeking input from interested groups (pupils, staff, parents etc) to consider improvements to safeguarding procedures.	DSL	As required; annually at a minimum
Formal annual review of the School's safeguarding policies and procedures.	Governors, DSL and School Bursar	Annually at a minimum
Assessing the adequacy of the safeguarding arrangements for those who use or hire the School premises.	School Bursar	Prior to commencement of arrangement

6.5 Head

6.5.1 The Head is responsible for the day-to-day management of safeguarding in the School and for the management of concerns and allegations about staff.

6.5.2 The Head ensures the School's safeguarding policies and procedures are understood and followed by all staff.

6.6 Designated Safeguarding Lead

6.6.1 The DSL is a member of the School's Senior Leadership Team (SLT) with the necessary status and authority to take lead responsibility and overview for all aspects of safeguarding and child protection for the whole school including EYFS and the boarding provision; this includes online safety and understanding the filtering and monitoring systems and processes in place.

6.6.2 The DSL has the appropriate status and authority within the School to carry out the duties of the post, and the time, funding, training, resources and support to enable them 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 name and contact details of the DSL are set out in the School contact list at the front of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE.

6.6.3 The DSL will also liaise with the Head to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles, and to know the provisions of PACE Code C and other applicable codes of practice.

6.6.4 The DSL will take lead responsibility for pupils who are looked after children. Direct support will be delegated to the teacher designated for looked after children.

6.6.5 The DSL takes lead responsibility for all aspects of safeguarding throughout the School. The DSL meets at least termly with the Nominated Governor to discuss recent trends and updates.

6.6.6 If the DSL is unavailable, the activities of the DSL will be carried out by a nominated Deputy DSL. The Deputy DSL's details are also set out in the School contact list at the front of this policy.

6.6.7 The DSL and DDSL have written job descriptions describing the responsibility and activities related to the role.

7 Safeguarding Principles

7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.

7.2 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. The School requires everyone who comes into contact with children and their families to share this commitment.

7.3 The School will:

7.3.1 understand its role in the safeguarding partner arrangements and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by Cambridgeshire and Peterborough Safeguarding Partnership Board;

7.3.2 be alert to signs of abuse both in the School and from outside, within or outside of the child's family and take steps to protect individuals from any form of abuse, neglect or exploitation whether from an adult or another child;

7.3.3 ensure robust safeguarding systems are in place and are followed in relation to the School's boarding provision including particular vigilance for potential child-on-child abuse as well as implementing strict parameters regarding boarders' activity online and access to potential harmful material;

7.3.4 include opportunities within the curriculum for children to develop the skills they need to recognise and stay safe from abuse;

7.3.5   promote the systems in place for children to confidentially report abuse ensuring they know their concerns will be treated seriously and that they can safely express their views and give feedback;

7.3.6   deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with education, child protection and / or welfare plans;

7.3.7   design and operate procedures which, so far as possible, ensure that staff, pupils, and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

7.3.8   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 WTSC and KCSIE;

7.3.9   be alert to children at potentially greater risk of harm (both online and offline) including children who need a social worker and mental health support;

7.3.10   be alert that children who identify as LGBT, or are perceived by others to be LGBT, may be targeted by other children and ensure action is taken to reduce the risks;

7.3.11   ensure that any child protection records are received or transferred to / from the previous or next School as soon as possible and within 5 days so that appropriate support can be put in place for the child;

7.3.12   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, neglect or exploitation;

7.3.13   encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them;

7.3.14   operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

7.3.15   assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on the understanding of the potential risk in the local area;

7.3.16   identify pupils who may be susceptible to radicalisation, and know what to do when they are identified in accordance with the School's *Preventing Extremism and Radicalisation Policy;*

7.3.17   identify pupils who might be vulnerable to being drawn into county lines or other gang activities;

7.3.18   consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the School or in the local area; and

7.3.19   allow staff to determine how best to build trusted relationships with pupils which facilitate communication.

7.4   Extra-familial Harm

7.4.1   Safeguarding incidents and / or behaviours can be associated with factors outside the School and / or can occur between children outside the School, inside and outside of home and online.

7.4.2   All staff, including the DSL, should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to safety and / or welfare.

7.4.3   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.

7.4.4   All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitations 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

7.5   Staff may follow the School's *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. Such concerns will always be taken seriously by the School. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally; the contact details for the NSPCC are at the front of this policy. Staff may also report concerns directly to the local authority or to the Charity Commission if they consider the School has failed to deal with concerns appropriately.

8   Reporting Obligations

8.1   Staff 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.

8.2   Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and / or they might not recognise their experiences as harmful, eg a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and / or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

8.3   All staff have a duty to:

8.3.1   report any concerns they may have about the safety and / or wellbeing of pupils (this includes where there are concerns about children who may be at risk of being drawn into terrorism);

8.3.2   report any concerns they may have about the safety and / or wellbeing of other persons associated with the School;

8.3.3   report any safeguarding concerns about staff or anyone else associated with the School; and

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

8.4　　The procedures for reporting are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to seek guidance from the DSL, any member of the School's Senior Leadership Team, or directly to children's social care or the police in their absence.

9　　Procedures for Staff

9.1　　If staff have **any concern about a pupil's welfare**, they should report their concern either via MyConcern or directly 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.

9.2　　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.

9.3　　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 and parts 1 and 4 of KCSIE.

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

9.4.1　The DSL, Deputy DSL or Designated Person should always be available during school hours or for activities taking place out of term to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns. However, as staff availability cannot be guaranteed out of school hours or when there is no school activity taking place, urgent safeguarding matters should be referred directly to children's social care (and copied to the DSL). During these times, non-urgent matters may be reported via MyConcern or emailed to the DSL.

9.4.2　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.

9.4.3　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.

9.4.4　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.

Action by the DSL

9.4.5　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 10 below);

<blockquote>

(ii) undertaking an Early Help assessment (which would require parental consent) (see 11 below); or

(iii) making a referral for statutory services (see 12 below).

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

9.4.7 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.
</blockquote>

10 Managing Support for Pupils

10.1 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*.

10.2 The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from children's social care where necessary.

10.3 Form Tutors provide immediate support for pupils. More specialist support is provided by Heads of Year, Deputy Heads, the Housemaster (for boarders), and the School Nurse. Specific concerns are discussed at a variety of weekly staff meetings including those of the Senior Management Team, Senior Pastoral Team, Boarding House staff meeting and the Senior Leadership Team so that everyone is aware and knows how to best to support a pupil.

10.4 Boarders have access to an Independent Listener who they may contact via email at any time. The details of the Independent Listener are posted on noticeboards throughout the Boarding House. In addition, boarders are given a contact card with the details of Childline and the Children's Commissioner (Help at Hand) should they wish to speak with them. Boarders are reminded at the beginning of each school term of the resources available to them and the adults they may speak with should they have any worry or concern.

10.5 Pupils are able to send a note that details any worry or concern they may have to any member of staff via the Worry Box which is located outside the Library.

10.6 Pupils with complex needs who need specialist support may be referred to the School's Integrative Child Psychotherapist, Nicky Harris MA UKCP, who is an independent counsellor and is able to see pupils at School; appointments are made by private arrangement and contract with parents.

11 Early Help

11.1 Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It can be provided at any stage of a child or young person's life to parents, children, or whole families, and is generally supported by children's social care in consultation with the family.

11.2 The School's safeguarding training includes guidance about Early Help processes 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:

11.2.1 is disabled or has certain health conditions and has specific additional needs;

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

11.2.3 has experienced multiple suspensions, is at risk of being permanently excluded from school and in alternate provision or a pupil referral unit;

11.2.4 has a mental health need;

11.2.5 is a young carer;

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

11.2.7 is frequently missing / goes missing from care or from home;

11.2.8 is at risk of modern slavery, trafficking, sexual or criminal exploitation;

11.2.9 is at risk of being radicalised or exploited;

11.2.10   has a family member in custody, or is affected by parental offending;

11.2.11   is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

11.2.12   is misusing drugs or alcohol themselves;

11.2.13   is looked after or has returned home to their family from care;

11.2.14   is at risk of 'honour based' abuse such as Female Genital Mutilation or Forced Marriage;

11.2.15   is a privately fostered child; and

11.2.16   is persistently absent from education including persistent absences for part of the school day.

11.3   A member of staff who considers that a pupil may benefit from Early Help should keep a written record of their concerns and 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 menu of Early Help services and their referral threshold document and will support staff in liaising with parents other agencies and setting up an inter-agency assessment as appropriate.

11.4   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, staff may be required to take a lead role.

11.5   The matter will be kept under review and consideration given to a referral to children's social case for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.

12   Making a Referral

12.1   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.

12.2   Harm is the 'ill treatment or impairment of the health or development of a child.' Seeing or hearing the ill treatment of another person is also a form of harm. It can be determined 'significant' by 'comparing a child's health and development with what might be reasonably expected of a similar child.'

12.3   The contact details for children's social care, including the link to the online referral form, are set out at the front of this policy.

12.4   Anyone can make contact with children's social care to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members, and members of the public. Parental consent is not required for referrals to statutory agencies.

12.5   The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting children's social care.

12.6   Statutory Assessments

   12.6.1   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:

   (i)   **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.

   (ii)   **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.

12.7   Anyone can make a referral. Staff required to make a direct referral may find helpful the flowchart set out in Part 1 of KCSIE and information in Chapter 1 of WTSC about the likely actions and decisions required.

12.8   Parental consent is not required for referrals to statutory agencies but 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:

   12.8.1   personal details of the child including the child's developmental needs;

   12.8.2   detailed information about the concern;

   12.8.3   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.

12.9   If a referral is made by telephone, this should be followed up in writing.

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

12.11　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.

12.12　Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure the concerns are addressed and that the child's situation improves. Further details about local escalation procedures are held with the DSL.

13　Allegations Against Pupils – Child-on-Child Abuse

13.1　Allegations against pupils should be reported in accordance with the procedures set out in this policy (see Appendix 3). 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.

13.2　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 and Removal - Review Policy and Procedure* 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.

13.3　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 to support, advise and assist and ensure the pupil's rights and entitlements are respected. 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.

13.4　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.

14　Welfare Concerns

14.1　Staff who have concerns about the welfare of others, or any other safeguarding issue not expressly covered by this policy, should report them.

14.2　In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.

15　Allegations or Concerns About Staff

15.1　The School has procedures for dealing with allegations made and / or concerns raised about staff, which includes employees as well as volunteers and contractors:

　　　15.1.1　The procedures in this policy apply to staff who pose a risk of harm to children, or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to 'low level concerns' which are concerns that do not meet the harm threshold. The procedures aim to strike a balance between the

need to protect children from abuse and the need to protect staff from false, malicious, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

15.1.2 The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

15.2 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.

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, the LADO, children's social care, the police, and / or the pupil before discussing details with parents. In all cases, the DSL will be guided by the Cambridgeshire and Peterborough Safeguarding Children Partnership Board threshold document.

16.2 Where a pupil has made a disclosure which relates to a family member, the parents should not be informed unless advised by the safeguarding team at children's social care.

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;

17.1.2 **Charity Commission**

(i)   The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance How to report a serious incident in your charity (Charity Commision, June 2019);

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.

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.

17.1.5 Insurers

(i)   The School will consider whether it is necessary to report a safeguarding incident to the School's insurers and / or brokers and, if so, the timescale required by the relevant policies. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

(ii)   Care should be taken to ensure this is done before renewal to ensure 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 and / or the extent of report required, professional advice should be sought.

17.1.6 UK Visas and Immigration

(i)   In order to comply with its duties as a Child Student Sponsor, the School will report to the Home Office if there is any non-compliance with the rules governing a pupil's Student visa.

18   Safer Recruitment and Supervision of Staff

18.1   The School is committed to practicing safer recruitment in checking the suitability of staff, including staff employed by another organisation. See the School's *Safer Recruitment Policy*.

18.2   The School maintains a single central register of appointments for all staff.

18.3   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 causes them to meet any of the criteria for Disqualification under the Childcare Act 2006.

18.4   The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's *Visiting Speaker Policy*.

19   Use of Mobile Devices

19.1   The School's policy on the use of mobile devices in the School, including in the EYFS setting, is as follows:

19.1.1   The School's *Acceptable Use of ICT for Pupils Policy,* sets out the expectations for pupils. Pupils in Pre-Prep are not permitted to bring mobile devices onto the school premises. For all other pupils, mobile devices must be switched off and remain in school bags or lockers during school hours. Pupils must not gain access to the school network with personal devices at any time; use of mobile data while on the school premises during school hours is strictly prohibited.

19.1.2   Staff should use follow the guidance regarding mobile devices as set out in the *Staff Code of Conduct*.

19.1.3   Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts, or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

19.1.4 Visitors may bring mobile phones onto the premises but must not take photographs or video under any circumstances without the express permission of the Head.

19.1.5 The School allows access to the internet onsite for pupils using School devices. Appropriate internet safety measures are taken to manage associated risks, including the use of filtering and monitoring software.

19.2 The School's approach to online safety is set out in the School's *Online Safety Policy*.

20 Secure School Premises

20.1 The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

20.2 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. 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.

20.3 All visitors to the Boarding House (including parents, legal guardians and education guardians of boarders and choristers) must sign in during the normal School day in accordance with clause 20.2 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; depending on the circumstances, they may not be required to be kept under direct staff supervision during their visit, 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.

21 Training

21.1 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.

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

21.3 The School maintains written records of all staff training.

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

21.5 Induction

21.5.1 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 *Whistleblowing Policy;*

- the *Acceptable Use of ICT for Pupils 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;

- the *Policy for Good Discipline*;

- the *Anti-Bullying Policy;*

- the Staff Handbook;

- the role, identity and contact details of the DSL, Deputy DSL and Designated Person;

- a copy of Part 1 and Annex B of KCSIE;

- the safeguarding response to children who go missing from education;

- the School's approach to online safety which includes an understanding of the expectations, applicable roles and responsibility of staff in the filtering and monitoring of online activity;

- safeguarding training in accordance with Cambridgeshire & Peterborough Safeguarding Children Partnership Board procedures including guidance on managing a report of child-on-child harmful sexual behaviour; and

- appropriate Prevent duty training.

Staff delivering the induction training ensure that staff understand the material and have the opportunity to discuss topics in more detail where required.

21.6   Safeguarding Training

21.6.1 School leaders and all staff will receive a copy of this policy, Part 1 and Annex B of KCSIE and will be required to confirm that they have read and understand these.

21.6.2 Members of the Senior Leadership Team and the Nominated Governor will receive a copy of this policy and be expected to read all of KCSIE.

21.6.3 The Head and all staff members will undertake appropriate safeguarding training which will be updated at least every three years 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.

21.6.4 Staff development training will also include training on online safety which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the School, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the School.

21.6.5 The School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as child-on-child abuse, radicalisation, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyber bullying, prejudice-based and discriminatory bullying, gangs and mental health, to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

21.6.6 All Governors receive safeguarding training (including online safety) on induction. This training will equip them with the knowledge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole-school approach to safeguarding. This training will be regularly updated.

21.6.7 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.

21.7 DSL, Deputy DSL and Designated Person

21.7.1 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 inter-agency working and Prevent awareness training and will be updated at least every two years.

21.7.2 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.

21.7.3 Prevent duty training will be consistent with the government's Prevent training for schools. See Educate Against Hate (HM Government, 2018) for further details.

21.8 Teaching Pupils about Safeguarding

(i) The School teaches pupils about safeguarding through the curriculum and PSHE, 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) The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach might be needed for more vulnerable children, victims of abuse, and some SEND children.

(iii) Pupils are introduced to wellbeing, emotional, physical, and mental health in an age appropriate manner in order to develop resilience and self-esteem in an age-appropriate manner. Resilience is particularly important in safeguarding to mitigate the risk of being drawn into extremism.

(iv) 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 PSHE lessons appropriate to pupils' age and stage of development.

(v) Children who identify as LGBT, or those who are perceived but do not identify as LGBT, can be targeted by other children. LGBT inclusion is taught as part of the statutory Relationships Education, Relationships and Sex Education and Health Education curriculum through age-appropriate PSHE lessons.

(vi) 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.

(vii) 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 so that pupils learn how to keep themselves safe online. The Governors have ensured that appropriate filtering and monitoring systems are in place and meet the DfE's filtering and monitoring standards and are mindful that this should not lead to unnecessary restrictions on learning.

(viii) The School keeps in regular contact with parents and carers to reinforce the importance of pupils being safe online and make them aware of the systems in place to filter and monitor online use and the sites pupils will be expected to access during learning.

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 pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil 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 Governors. Where an incident involves a member of staff, the LADO 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 regards to safeguarding arrangements at any time will be remedied without delay.

23.3 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

23.4 The 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. As part of this review, the Governors will also review the School's approach to online safety and the filtering and monitoring provision.

23.5   Appropriate training in the oversight of safeguarding is provided to the Governors. Governors visit the School and undertake site walks to check the implementation of safeguarding procedures. They also talk to staff and pupils to gain an overview of safeguarding matters in the School. The Nominated Governor checks the Single Central Register on a regular basis.

23.6   The DSL reports to the Education and Pastoral Committee to raise any topics of interest and summarise the School's safeguarding practices over the year.

23.7   The DSL will work with the Nominated 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.

23.8   The Governors will review the report and should also consider independent corroboration, such as:

23.8.1 inspection of records or feedback from external agencies including the LADO;

23.8.2 reports of ISI inspections;

23.8.3 the outcome of any relevant complaints, claims or related proceedings; and

23.8.4 press reports.

23.9   The Governors will review the report, this policy and the implementation of its procedures, including good cooperation with local agencies, and consider any proposed amendments to this policy, from both the DSL and its own members, before giving the revised policy its final approval. Detailed minutes recording the review by the Governors will be made.

24   Recordkeeping

24.1   All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

24.1.1 A clear and comprehensive summary of the concern;

24.1.2 Details of how the concern was followed up and resolved;

24.1.3 A note of any action taken, decisions reached and the outcome;

24.1.4 Open concerns are regularly reviewed by pastoral staff and the DSL and closed once all actions are complete. Pupils with significant historic concerns will be regularly monitored.

24.2   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.

24.3   All records created in accordance with this policy are managed in accordance with the School's *Data Protection and Retention Policy*.

24.4   Insofar as pupil records are concerned:

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

24.4.2 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.

25 Information Sharing and Multi-Agency Working

25.1 The School will treat all safeguarding information 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. When a child leaves the School, their child protection file, should one exist, is transferred securely to the new school as soon as possible and within 5 days of the pupil starting so that appropriate support may be put in place immediately.

25.2 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their education outcomes. 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.

25.3 When the School received 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 UK GDPR and Data Protection Act 2008. The School will also have regard to its data protection procedures. The School Bursar will work with the DSL as appropriate to determine what information should be disclosed.

25.4 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 17 and 47 of the Children Act 1989.

25.5 The School will cooperate with children's social care and, where appropriate, the police to ensure that all relevant information is shared for the purposes of Early Help assessments, and assessments and child protection investigations under the Children Act 1989.

25.6 Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and social services to agree the information that should be disclosed and to whom.

25.7 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.

26 Version Control

Date of last review	July 2024
Date of next review	July 2025
Policy owner	Head / DSL
Authorisation	Rev Dr Stephen Cherry, Chair of Governors on behalf of the Board of Governors

Appendix 1   Forms of Abuse, Neglect and Exploitation

1   Abuse, neglect and exploitation

1.1   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; therefore, staff should always be vigilant and always raise any concerns with the DSL.

1.2   Children can also abuse their peers online. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

2   Definitions of abuse and neglect

2.1   **Abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

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

2.3   **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, prejudiced-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

2.4   **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. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it. The School's procedures for child-on-child abuse can be found in Appendix 3.

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

3 Signs of Abuse

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

3.1.1 the pupil says they have been abused or asks a question or makes a comment which gives rise to that inference;

3.1.2 there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour or there is a sudden or significant change in the pupil's behaviour;

3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;

3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;

3.1.7 the pupil is reluctant to go home, or has been openly rejected by their parents or carers; and

3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

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

3.3 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.

4 Specific Safeguarding Issues

4.1 Statutory guidance acknowledges the following as specific safeguarding issues:

4.1.1 child abduction and community safety incidents;

4.1.2 child-on-child abuse;

4.1.3 children and the court system;

4.1.4   children missing from education;

4.1.5   children with family members in prison;

4.1.6   child criminal exploitation and child sexual exploitation;

4.1.7   consensual and non-consensual sharing of indecent images and upskirting;

4.1.8   county lines or other gang activities;

4.1.9   cybercrime;

4.1.10 domestic abuse;

4.1.11 homelessness;

4.1.12 honour-based abuse (including female genital mutilation and forced marriage);

4.1.13 mental health issues;

4.1.14 modern slavery and the national referral mechanism;

4.1.15 preventing radicalisation;

4.1.16 serious violence;

4.1.17 sexual violence and sexual harassment between children.

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

4.3   Children missing from education

4.3.1   Children going missing, particularly repeatedly and for prolonged periods, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, 'honour-based abuse' or risk of forced marriage. 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.

4.3.2   Where reasonably possible the School will hold more than one emergency contact for each pupil in order to ascertain whether a child is missing.

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

4.3.4   This will assist the local authority to:

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

b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation or involvement with serious violent crime.

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

a) fails to attend School regularly; or

b) 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).

4.4 Elective Home Education (EHE)

4.4.1 Where a parent expresses their intention to remove a pupil from school with a view to educating them at home, the School will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and / or has a social worker.

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

4.5.1 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:

a) in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or
b) for the financial advantage or increased status of the perpetrator or facilitator; and / or
c) through violence or threat of violence to victims (and their families).

4.5.2 Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

4.5.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

4.5.4 The victim may have been exploited even if the activity appears consensual.

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

4.5.6 Some of the following can be indicators of both, including children who:

a) appear with unexplained gifts, money or new possessions;
b) associate with other young people involved in exploitation;
c) suffer from changes in emotional wellbeing;
d) misuse drugs or alcohol;
e) go missing for periods of time or regularly come home late; and
f) regularly miss school or education or do not take part in education.

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

4.5.8   CSE 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.

4.5.9   The victim may have been sexually exploited even if the sexual activity appears consensual. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g through others copying videos or images they have created and posted on social media). The CCE indicators above may also be indicators of CSE as children who:

   a) have older boyfriends or girlfriends;
   b) suffer from sexually transmitted infections or become pregnant.

4.6   County Lines

4.6.1   'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (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.' They are likely to exploit children and vulnerable adults to move, store, and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

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

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

4.6.4   Additional reporting duties:

   a) If a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services or providers who offer support to victims of county lines exploitation.
   b) Where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

4.7   Serious Violence

4.7.1   Indicators which may signal children are at risk from, or are involved with serious violent crime may include:

   a) increased absence from school;
   b) a change in friendships or relationships with older individuals or groups;
   c) a significant decline in performance;
   d) signs of self-harm or a significant change in wellbeing;
   e) signs of assault or unexplained injuries; and
   f) unexplained gifts or new positions (which may also indicate a child is at risk of criminal exploitation).

4.7.2   Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence e.g. having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft and robbery. Further advice for schools is provided in the Home Office's *Preventing youth violence and gang involvement* and its *Criminal exploitation of children and vulnerable adults: county lines guidance.*

4.8   Cybercrime

4.8.1   Cybercrime is a criminal activity committed using electronic devices and / or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or 'cyber-dependent' (crimes that can only be committed by using an electronic device).

4.8.2   Cyber-dependent crimes include:

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

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

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

4.9   Domestic Violence

4.9.1   Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be but is not limited to: psychological, physical, sexual, financial or emotional.

4.9.2   Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.

4.93   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.

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

4.10   Honour-Based Abuse

   4.10.1 All forms of so-called honour-based abuse (regardless of motivation) 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.

   4.10.2 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.

   4.10.3 Female Genital Mutilation (FGM)

      (a)   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.

      (b)   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 38-43 of the Multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 61-63 focus on the role of schools).

      (c)   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.

      (d)   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 (January 2020) for further details about the duty.

      (e)   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.

   4.10.4 Forced Marriage

      (a)   Since February 2023 it has been a crime to carry out any conduct with the purpose to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

      (b)   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.

(b)   Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found in the following publication: Multi-agency guidelines; handling cases of forced marriage (April 2023).

(c)   Staff should speak to the DSL if they have any concerns. The publication Multi-agency guidelines: handling case of forced marriage highlights the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fcdo.gov.uk for advice and information.

4.11   Radicalisation and the Prevent Duty

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

4.11.2 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.

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

- **Extremism:** '*vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas*.'

- **Radicalisation:** '*the process of a person legitimising support for, or use of, terrorist violence*'

- **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.*'

4.11.4 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 may different methods (such as social media) and settings (such as the internet).

4.11.5 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 Prevent referral.

4.11.6   Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, February 2021).](#)

4.11.7   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.

4.11.8   Contact details of the School's Prevent Lead are set out in the Key Contacts section of this policy.

4.12   Child-on-Child Abuse

4.12.1   All staff should be aware that children can abuse other children and that it can happen both inside and outside of school as well as online.

4.12.2   The School's procedures for dealing with child-on-child abuse can be found in Appendix 3.

4.13   Online Safety

4.13.1   All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

4.13.2   It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

4.13.3   The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

(a) **content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

(b) **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

(c) **conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying; and

(d) **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils or staff are at risk, it should be reported to the Anti-Phishing Working Group (https://apwg.org/).

4.14   Sharing nude and semi-nude images and videos

   4.14.1 Consensual and non-consensual sharing of nudes and semi-nude images and / or videos can be signs that children are at risk.

   4.14.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery. The School treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.

   4.14.3 Members of staff should not view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.

   4.14.4 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, app or suitable reporting agency to have it taken down or to support the pupils or parents in making a report; or

   (c) a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.

   4.14.5 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 should not view the image themself;

   (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.

   4.14.6 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.

4.14.7 If an electronic device that is prohibited by the school 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.

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

4.14.9 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).

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

4.14.11 The UK Council for Child Internet Safety's advice note Sharing nudes and semi- nudes: advice for education settings working with children and young people (December 2020) contains details of support agencies and provides further information for schools on how to responding to incidents of sexting.

4.14.12 Advice for pupils is available at:

http://www.thinkuknow.co.uk

https://www.childline.org.uk/explore/onlinesafety/pages/sexting.aspx

4.14.13 Advice for parents is available at:

http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/

4.14.14 The Home Office has published Indecent images of children: guidance for young people (November 2019) to help young people understand the law on indecent images of children and how to navigate the internet confidently and safely within legal boundaries.

5   Upskirting

5.1   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. Anyone of any gender can be a victim.

5.2   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.

5.3   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.

5.4   All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

6 Special Educational Needs and Disabilities

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

6.2 Additional barriers can exist when detecting the abuse, neglect or exploitation 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 or certain health conditions can be more prone to peer group pressure and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;

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

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

6.3. The School should provide extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.

7 Looked After Children

7.1 The Governors ensure that staff have the skills, knowledge and understanding to keep looked after children safe and that appropriate staff have 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 them.

7.2 The DSL maintains these details, including contact details of the child's social worker.

8 Care Leavers

8.1 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.

9 Mental Health

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

9.2   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.

9.3   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.

9.4   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.

10   Children who are Lesbian, Gay, Bisexual or Gender Questioning

10.1   The School recognises that pupils who are or are perceived to be lesbian, gay, bisexual or gender questioning are vulnerable to being targeted by other children.

10.2   Inclusion for all is taught as part of the PSHE and RSE curriculum.

10.3   All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

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. Use 'tell me, explain to me, describe to me' (TED) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the police will need to take the lead on investigating and continued questioning might compromise possible criminal proceedings.

1.3 Reassure the pupil they are being taken seriously and they will be supported and kept safe.

1.4 Do 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. This will involve professional judgement, but where doubts exist, the information must be passed on in accordance with this policy.

1.5 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.

1.6 Pass on the record when reporting the concern in accordance with this policy.

1.7 Where a pupil makes a disclosure relating to a family member, parents should not be informed unless advised to do so by the safeguarding team at children's social care.

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 signed and dated, with the name of the signatory clearly printed in writing. Records 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 a clear and comprehensive summary of the event / concern / conversation;

2.2.4 details of how the concern was followed up and resolved;

2.2.5 the action taken and by whom with reasons for the decision made and the outcome;

2.2.6 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.

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

otherwise by the agency) to inform them and that they should expect further contact from the agency.

3 **Use of Reasonable Force**

3.1 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.

3.2 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   Procedures for Allegations of Child-on-Child Abuse

1   Child-on-Child Abuse

1.1   Children of any age can abuse other children and this can happen inside and / or outside school and / or online. This includes, but is not limited to:

1.1.1.   bullying (including cyber-bullying and prejudice-based and discriminatory bullying);

1.1.2.   abuse within intimate personal relationships between children (teenage relationship abuse);

1.1.3.   physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);

1.1.4.   sexual violence such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;

1.1.5.   sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

1.1.6.   causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

1.1.7.   consensual and non-consensual sharing of nude and semi-nude images (also known as 'sexting' or 'youth produced sexual imagery') means the taking and sending or posting of nude or semi-nude images, videos or lives streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop;

1.1.8.   upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

1.1.9.   initiation / hazing type violence and rituals that could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element.

2   The School's approach to child-on-child abuse

2.1   Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).

2.2   Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero tolerance approach to abuse. Downplaying certain behaviours by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and at its worst, to a culture that normalises abuse.

2.3   All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this policy and / or the school's *Policy for Good Discipline* and the *Anti-Bullying Policy*, so that appropriate action can be taken.

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

3   Sexual violence and sexual harassment (SVSH)

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

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

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

3.4   SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.

3.5   The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The School acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4   Management of allegations of child-on-child SVSH

4.1   The initial report

4.1.1   The School recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them, and to respond to all reports of abuse however they are reported and whether they are made by victims directly or by third parties.

4.1.2   The School acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to

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receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.3   They should:

a)   listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;

b)   where possible they should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;

c)   where there is an online element, consider the searching, screening and / or confiscation of devices and the UKCIS *Sharing nudes and semi-nudes: advice for education settings working with children and young people*. The key consideration is for staff not to view or forward illegal images of a child;

d)   explain the next steps and how the report will be progressed;

e)   make a written record of the report (recording the facts as the child has presented them);

f)   inform the DSL (or deputy) as soon as practically possible if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2   DSL's considerations

4.2.1   Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interest of the pupils involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue.

4.3   School's considerations

4.3.1   The School will consider:

a)   the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the School may have to take action to protect other children;

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

c)   the ages and developmental stages of the children involved and any imbalance between them;

d)   if there is an intimate personal relationship between the children;

e)   whether there are any ongoing risks to those involved;

f)   the time and location of the incident and any action required to make the location safer; and

g)   the wider context.

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

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

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

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

5   Investigations and findings

5.1   The School will record the findings of investigations undertaken by the police and / or the CPS, and if the police decide not to take any further action, will consider whether investigation should be undertaken or commissioned by the School to enable it to determine whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances when this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.

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

Appendix 4   Procedures for Allegations or Concerns Against Staff

1   The School's procedures

1.1   The School promotes an open and transparent culture in which all concerns about all members of staff working in or on behalf of the School, in a paid or unpaid capacity, are dealt with promptly and appropriately, whether they are low level concerns or constitute an allegation that the person poses a risk of harm.

1.2   By doing this, it aims to identify any concerning, problematic or inappropriate behaviour early in order to minimise the risk of abuse, support everyone affected and to inform members of staff of any behaviour which is or could be deemed to be inappropriate or that which crosses acceptable professional boundaries and to help them reflect, manage and learn.

1.3   The School has procedures for dealing with two levels of allegations made or concerns raised about staff. These cover:

    1.3.1   allegations or concerns that do not meet the harms threshold, otherwise known as 'low level concerns'; and

    1.3.2   allegations that may meet the harms threshold.

1.4   Low level concerns

    1.4.1   The School encourages everyone affected by its operation to report any concern, even those that do not appear serious enough to make a referral; staff should report a concern to the Head or DSL if they believe that a member of staff may have acted in a way that is inconsistent with expected professional standards and / or the *Staff Code of Conduct* so that the appropriate action can be taken.

    1.4.2   Examples of such behaviour could include, but it not limited to:

        a)   being overly-friendly with children;
        b)   having clear favourites;
        c)   taking photographs of children on their mobile phone in a manner which is not in accordance with School procedures;
        d)   engaging with a child on a one-to-one basis or in a secluded area or behind a closed door without a window; or
        e)   humiliating pupils.

    1.4.3   All members of staff are themselves encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and / or on reflection they believe they have behaved in such a way that they consider may have fallen below the expected standards.

    1.4.3   The purpose of the School's policy with regards to low level concerns is to create and embed a culture of openness, trust and transparency in which the School's values and behaviour expectations, which are set out in the *Staff Code of Conduct*, are consistently displayed by all staff.

    1.4.4   The Head and DSL will address the concern in a proportionate manner. They will consider whether the matter is a low level concern - one which does not meet the allegations threshold (as set out in this section) or is otherwise not considered serious enough to

consider a referral to the designated officer(s), or whether it is sufficiently serious to meet the harms threshold.

1.4.5   The School considers that all concerns about members of staff should be shared responsibly with the right person, that they should be recorded and that they should be dealt with appropriately. In most cases, and particularly where a low level concern has been raised by a third party, that will involve some form of investigation by the Head and, where possible, discussions with the person raising the concern, the person about whom the concerns have been raised and any witnesses.

1.4.6   The information collected as part of any such investigation will help to categorise the type of behaviour and determine what further action may need to be taken. The detail of the concern should be recorded along with the context in which it arose, the rationale for the decisions made and action taken. This information should be kept confidential and stored securely. The name of individuals sharing concerns should also be noted, but a wish to remain anonymous should be respected as far as reasonably possible.

1.4.7   Records of low level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

1.4.8   Where a pattern of behaviour is identified, the School will decide on a course of action to take which might include reference to its internal disciplinary procedures or a referral to the designated officer(s) if the harms threshold is met. The School will also consider whether there are any wider cultural issues in School that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

1.4.9   Low level concerns should not be included in staff references unless they relate to issues which would normally be included e.g. misconduct or poor performance. Those that relate exclusively to safeguarding should not be referred unless they meet the threshold for referral to the LADO and are found to be substantiated.

1.5   Allegations that may meet the harms threshold

1.5.1   Allegations that may meet the harms threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school, for example where the member of staff has:

(a) behaved in a way that has harmed a child, or may have harmed a child; and / or

(b) possibly committed a criminal offence against or related to a child; and / or

(c) behaved towards a child or children in a way that indicates they would pose a risk of harm if they work regularly or closely with children. This includes behaviour that may have happened outside school and creates a transferable risk.

1.6   The School should consider whether any allegations not meeting this criteria should be dealt with as low level concerns. Advice from the LADO will be sought in borderline cases.

1.7   All such allegations must be dealt with as a priority without delay. The LADO 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 in paragraph 1.5.1 above.

1.8   Allegations against a teacher who is no longer teaching, and historical allegations will be referred to the police and may also be discussed with the designated officer.

2   Reporting an allegation

2.1   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.

2.2   Allegations against staff: Where an allegation or complaint is made against the any member of staff that is clearly not a low level concern, the matter should be reported to the Head immediately or, in the Head's absence, the Chair of Governors. The allegation will be discussed immediately with the LADO before further action is taken. Where appropriate, the Head will consult with the DSL.

2.3   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 Nominated Governor, without first notifying the Head. Again, any such allegations will be discussed immediately with the LADO before further action is taken. The Chair of Governors will consult the Nominated Governor and vice versa.

2.3   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 Governor. If either the Chair of Governors or the Nominated Governor are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the LADO before further action is taken. Where appropriate, the Chair of Governors will consult the Nominated and vice versa.

2.4   If it is not possible to report to the Head or Chair of Governors or Nominated 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 Governor.

2.5   The person taking action in accordance with the procedures in this Appendix is known as the "case manager". The case manager will discuss the allegation immediately with the LADO before further action is taken.

3   Disclosure of information

3.1   The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.

3.2   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 only in relation to their child – no information can be shared regarding the staff member. 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.

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

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

4   Further action to be taken by the School

4.1   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.

4.2   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.

5   Ceasing to use staff

5.1   If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement 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.

5.2   If a member of staff tenders their resignation, or ceases to provide their services at a time when safeguarding concerns exist in relation to that person, those concerns 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.

5.3   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.

5.4   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.

6   Malicious allegations

6.1   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*.

6.2   Where a parent has made a deliberately invented or 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.

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

7 Recordkeeping

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

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

7.3   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, unfounded, unsubstantiated, or malicious will also not be included in any reference. Substantiated allegations should be included in references provided that the information is factual and does not include opinions.

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

Appendix 5 – Charity Safeguarding Procedures

1   Charity Safeguarding Duties

1.1. As trustees of a charity, the trustees as the Board of Governors, acknowledge in addition to their statutory duties to safeguard and protect children and adults at risk, they have a duty to take reasonable steps to protect everyone associated with the charity from harm, abuse or mistreatment.

1.2. This protection of the people involved in the charity is central to its culture. The full extent of these additional safeguarding duties is set out in the Charity Commission guidance: *Safeguarding and Protecting People for Charities and Trustees*. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse and data breaches.

1.3. The contents of the School's safeguarding and data protection policies, the Staff Handbook and the School's health and safety procedures set out how many concerns about these issues will be handled. If anyone has any safeguarding concerns which have caused or may cause harm to anyone associated with the charity which are not expressly covered by those or other School policies, they should contact the DSL without delay.

1.4. The trustees fulfil these duties by:

1.4.1   leading by example and promoting a fair, inclusive and positive culture, ensuring that everyone involved with the charity feels able to report any concerns they may have, confident that they will be heard and responded to;

1.4.2   setting and regularly (at least annually) reviewing the suitability of policies and procedures as a Board to ensure they remain fit for purpose and that they are followed in practice;

1.4.3   establishing appropriate delegation arrangements for the effective governance and management of safeguarding matters within the charity;

1.4.4   exercising proper oversight of the management of individual safeguarding matters and a review of the performance of the charity's safeguarding function, including consultation with stakeholders and appropriate trend analysis;

1.4.5   being quick to respond to concerns, to carry out appropriate investigations and take necessary action;

1.4.6   being open and transparent and not ignoring harm or downplaying failures;

1.4.7   managing conflicts of interest and / or loyalty;

1.4.8   ensuring that staff receive training in safeguarding at a level which is commensurate with their role;

1.4.9   ensuring that clear processes are in place relating to checks required where there are changes to the School structure or individual roles;

1.4.10 having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of:

(a) staff (there may be differing processes for international staff)

(b) partner organisations

(c) contractors

(d) beneficiaries

1.4.11. entering into appropriate agreements with other third parties (whether those who provide services to the Charity or directly to its beneficiaries (including pupils)) covering the relationship, their respective roles and monitoring and reporting requirements;

1.4.12. review its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep people safe;

1.4.13. reviewing any grant-making undertaken to ensure appropriate policies and procedures are in place;

1.4.14. implementing suitable reporting and monitoring processes are in place for any work overseas;

1.4.15. exercising proper oversight of the Charity's online operations, adequately managing risk and ensuring that online services are suitable for users;

1.4.16. set out risks and how it will manage them in a risk register;

1.4.17. allocating sufficient funds for the effective management of safeguarding and arranging appropriate insurance cover;

1.4.18. Ensuring a sufficient level of oversight of the charity's operations to manage risk and reporting any incidents which materially affect the charity's operations, finances, people or reputation to the Charity Commission in line with How to report a serious incident in your charity (Charity Commission, June 2019).