



## **Safeguarding Policy**

This is a whole school policy.

Author: Miss Rebecca Davies

<b>Action</b>	<b>Responsibility</b>	<b>Date</b>
Reviewed	Miss R Davies	March 2022
Approved	Mr A. Allman	
Next Review	Miss R Davies	March 2023

This policy applies to Myddelton College, ('the School'), which includes Myddelton College Preparatory School and Boarding Arrangements. The policy is updated annually in accordance with 'Keeping Learners Safe' (Wales) Welsh Government guidance for schools and colleges including independent schools (Wales): 2021) and Wales Safeguarding Procedures 2019 which are both available on the School's website.

## **Statement of Compliance**

Under [section 157 of the Education Act 2002](#), proprietors of independent schools must comply with this legislation for the purpose of meeting standards set out in regulations and exercise their functions in a way that takes into account the need to safeguard and promote the welfare of children.

The [Independent Schools Standards \(Wales\) Regulations 2003](#) set out the standards to which an independent school will be inspected under sections 160(4) and 163(2) of the Education Act 2002. [Standard 3](#) is specific to safeguarding and promoting the well-being, health and safety of children who are attending the school. Estyn will carry out an inspection of the school and report to Welsh Ministers on the extent to which the Independent Schools Standards are met. The Welsh Ministers will take into account Estyn's report and any other evidence relating to the Independent Schools Standards, to determine whether standards are met and to notify the proprietor of its conclusion.

## **Boarding Responsibilities and Arrangements**

In this policy the term "school staff" is used throughout the document this refers to all staff including boarding staff adherence and compliance with its content.

Proprietors of independent schools who provide accommodation for children will be aware that such establishments are required to register with both the Welsh Government and the Care Inspectorate Wales (CIW). Such independent schools are then subject to inspection by Estyn and CIW. The Welsh Government has published guidance on the [National Minimum Standards \(NMS\) for Residential Special Schools](#) and the [National Minimum Standards for Mainstream Boarding Schools](#) to be met as part of independent schools' initial and continued registration.

As with other independent schools, the [Independent Schools Standards \(Wales\) Regulations 2003](#) set out standards to safeguard and promote the welfare of children for whom accommodation is provided by a boarding school. These standards are used to assess whether the school is complying with its legal obligation to safeguard and promote the well-being of the children for whom accommodation is provided.

## **Registration / DBS checks of school Staff**

All school staff who work at the college have an Enhanced DBS certificate.

**A glossary of terms and abbreviations used in this policy can be found in Appendix 2 at the end of the document.**

## **School Safeguarding Audit Tool – Keeping Learners Safe Guidance (Apr 2021)**

The Audit tool linked to the Welsh Government “Keeping Learners Safe” Guidance 2021 has been provided to assist schools in evaluating its safeguarding procedures, processes and systems and identify areas for school improvement. School will use the audit to address any areas that school need to improve upon in the school year. This will form part of the evidence for any future Estyn inspection of the school. **The Audit tool is attached in Appendix 3**

## **Key Contacts**

### **Designated Safeguarding Leads (DSL) within the School:**

There will always be a safeguarding lead on the school site each day. If for some exceptional reason this cannot be in place school will have contact with these staff whilst off the school site to deal with any safeguarding issue.

### **Designated Safeguarding Lead:**

**Miss Rebecca Davies,**

**Assistant Headmistress, Head of Pastoral** and member of the Senior Leadership Team [b.davies@myddeltoncollege.co.uk](mailto:b.davies@myddeltoncollege.co.uk)

01745 472201 (school hours)

### **Deputy Designated Safeguarding Leads:**

**Mr Andrew Allman,**

**Headmaster & Head of Boarding**

[a.allman@myddeltoncollege.co.uk](mailto:a.allman@myddeltoncollege.co.uk)

01745 472201

**Mr Ian Lloyd,**

**Senior Deputy Headmaster** and member of the Senior Leadership Team

[i.lloyd@myddeltoncollege.co.uk](mailto:i.lloyd@myddeltoncollege.co.uk)

01745 472201

**Mrs Alicia Vogler,**

**Deputy Headmistress** and member of the Senior Leadership Team

[a.davies@myddeltoncollege.co.uk](mailto:a.davies@myddeltoncollege.co.uk)

01745 472201

**Mr Michael Pearson,**  
**Assistant Headmaster, Head of Behaviour** and member of the Senior Leadership Team  
[m.pearson@myddeltoncollege.co.uk](mailto:m.pearson@myddeltoncollege.co.uk)  
01745 472201

In the absence of the DSL, the Deputy DSL will act. For out of School activities/hours, staff will contact the DSL, initially by phone, in order to discuss safeguarding concerns, should they arise.

**Other Identified Safeguarding Level 3 Contacts:**

**Mrs N Pritchard,**  
**ALNCo**  
[n.pritchard@myddeltoncollege.co.uk](mailto:n.pritchard@myddeltoncollege.co.uk)  
01745 472201

**Key External Contacts:**

**In an Emergency, always ring 999.**

**Education Safeguarding Officer,**  
Denbighshire County Council.

**Denbighshire County Council Safeguarding Team Access**

Email: [cfsgateway@denbighshire.gov.uk](mailto:cfsgateway@denbighshire.gov.uk)

Telephone: 01824 712200 (Monday to Thursday 9am – 5pm and Friday 9am – 4.30pm)

Out of Hours Service Emergency Duty Team - 0345 053 3116 (after 5pm Mon –Thurs –Fri 4.30 pm and weekends)

The telephone numbers of the Denbighshire County Council Safeguarding Team (including contact details for children's social care for use in relation to children in need of help or who are the focus of concern) are as follows:

**Denbighshire County Council Single Point of Access:**

If you see, know of or have a concern about a worrying situation or about a child or young person's welfare who lives in Denbighshire contact the  
**Single Point of Access: 0300 456 1000.**

**Professionals will be asked to complete a referral form:**

## **Link to Denbighshire Safeguarding Referral Form:**

**Please note all North Wales Authorities use the same referral form**



Conwy  
Safeguarding Referral

Email the Referral Form to: [cfsgateway@denbighshire.gov.uk](mailto:cfsgateway@denbighshire.gov.uk)

**Contact details for the Local Authorities of students living in other counties are given below:**

### **Flintshire County Council Child Protection**

(For children in school who live in Flintshire)

**The Duty Social Worker, Duty and Assessment Team, Social Services for Children, County Offices, Chapel Street, Flint, CH6 5BD.**

Telephone: 01352 701000 (office hours)

Telephone: 0345 0533116 (outside of office hours)

Email: [ChildProtectionReferral@flintshire.gov.uk](mailto:ChildProtectionReferral@flintshire.gov.uk)

### **Conwy County Council Social Care Services**

(For children who live in Conwy)

Telephone: 01492 575111 (Monday to Friday 9am – 5pm)

Telephone: 0300 123 3079 (outside of office hours)

Email: [duty@conwy.gov.uk](mailto:duty@conwy.gov.uk)

Link to Referral Form for Email:

### **Wrexham County Borough Council:**

(For children in school who live in Wrexham Borough)

Telephone: Single Point of Access (SPOA): 01798 292039 (office hours)

Telephone: Emergency Duty Team (EDT): 0345 053 3116 (out of hours)

### **Gwynedd and Anglesey Local Safeguarding Children Board**

(For children in school who live on Anglesey and in Gwynedd)

Telephone: 01248 725888 (office hours)

Telephone: 01248 353551 (emergency out of hours)

Email: [teulumon@anglesey.gov.uk](mailto:teulumon@anglesey.gov.uk)

### **Cheshire West and Chester Safeguarding Children Partnership:**

(For children in school who live in Cheshire West and Chester)

<https://www.livewell.cheshirewestandchester.gov.uk/Services/998>

Telephone: Integrated Access and Referral Team (I-ART): 0300 123 7047 (Monday to Thursday 8.30am – 5pm and Friday 8.30am – 4.30pm)

Telephone: Emergency Duty Team (EDT): 01244 977 277 (4.30pm – 8.30am Monday to Thursday and from 4pm on Friday. 24 hours' weekends and bank holidays).

**Please Note:**

The home local authority where the pupil lives must be contacted when a safeguarding concern exists, if the pupil is from another authority or an overseas pupil Denbighshire children services should be contacted for advice **on all occasions** this may be especially relevant in the case of boarding students.

**Estyn Safeguarding Children:**

<https://www.estyn.gov.wales/inspection/safeguarding>

**Ofsted Safeguarding Children:**

<https://www.gov.uk/government/publications/ofsted-safeguarding-policy>

**The following telephone numbers may be useful:**

Child Line: 0800 1111

NSPCC: 0808 800 5000

NSPCC whistleblowing advice line: 0800 028 0285

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Weston House, 42 Curtain Road, London EC2A 3NH

**The following telephone numbers are for reporting concerns regarding antiterrorism:**

**Channel contacts** (see Appendix 1 for details regarding 'Channel' and the 'Prevent' Strategy):

**North Wales Police:** 0300 330 0101

<https://www.gov.uk/government/publications/prevent-duty-guidance>

**MI5 Anti-terrorist Hotline:** 0800 789 321

The Department of Education has a dedicated telephone helpline to enable staff and Directors to raise concerns relating to extremism: 020 7340 7264

Email:

[counter.terrorism@education.gsi.gov.uk](mailto:counter.terrorism@education.gsi.gov.uk)

## **Female Genital Mutilation (FGM)**

Anyone can report concerns about FGM to the North Wales police on the direct number 101.

The national helpline is: 0800 028 3550 and [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

In addition, there are local support groups to help victims:

## **North Wales Violence Against Women, Domestic Abuse and Sexual Violence Strategy**

<https://www.denbighshire.gov.uk/en/your-council/strategies-plans-and-policies/north-wales-vawdasv-strategy-2018-2023.pdf>

### **This policy has regard to the following guidance and advice:**

- ‘Keeping Learners Safe’ (Welsh Gov.) – Statutory Guidance for Schools and Colleges (2021)
- Disqualification under the Childcare Act 2006 DFE (update August 2018)
- Working Together to Safeguard Children 2021 Part 7 SSWBA Wales Act 2014 (A guide to inter-agency working to safeguard and promote the welfare of children)
- Sexual violence and sexual harassment between children in schools and colleges (Advice for governing bodies, proprietors, head teachers, principals, senior leadership teams and designated safeguarding leads) May 2018
- Information Sharing: Guidance for practitioners providing safeguarding services (Updated July 2018)
- Revised Prevent Duty Guidance for England and Wales (Updated April 2021)
- The Prevent Duty: Departmental advice for schools and childminders (April 2020)
- UKCCIS (UK Council for Child Internet Safety) ‘Education for a Connected World’
- The use of social media for on-line radicalisation (July 2015)
- Independent Schools Inspectorate Handbook 2018 – the regulatory requirements (and as amended).
- DBS Referral Guidance (as may be amended from time to time)
- National Minimum Standards for Boarding Schools April 2020
- Teacher Misconduct – [Teaching Regulation Agency \(TRA\)](#)
- Education (Independent Schools Standards) (England) Regulations 2014 (as amended from time to time)
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedom Act 2012
- The Children Act 2004
- Use of Reasonable Force in Schools 2013

- Information Commissioner’s Office Data Sharing Code of Practice May 2011 (awaiting update in 2019-20)
- Multi Agency Practice Guidelines: Female Genital Mutilation (2018)
- Equality Act 2010 (Updated June 2015)

The policy also complies with local safeguarding procedures and practice of Denbighshire as part of the inter-agency safeguarding procedures set up by the North Wales Safeguarding Board.

The latest information, training and legislation can be viewed via the hyperlink below for the NWSCB.

<https://www.northwalessafeguardingboard.wales/>

This policy operates in conjunction with other related policies and procedures, covering areas such as:

- Anti-Bullying
- Anti-Racism
- Behaviour
- Social Media
- Missing Children.
- Staff Code of Conduct (Staff Handbook)
- Complaints
- ICT Acceptable Use
- Whistleblowing
- Application and Recruitment
- Attendance and Registration
- Boarding Visitors
- Photographs and Digital Images
- Data Protection
- Restraint
- School Visitors
- Site Security
- PHSE
- Equal Opportunities

### **Reporting Concerns about a Child**

The Wales Safeguarding Procedures 2019 (as set out in chapter 1) provide common standards to guide child protection practice and a framework within which individual reports of a child at risk, actions, decisions and plans are made and carried out. They are an integral part of the framework for safeguarding and promoting the well-being of children. The DSL should ensure that everyone working in the education setting is aware of the Wales Safeguarding Procedures and can access the procedures in the college.



The School has a duty to consider at all times the best interests of the child and take action to enable all children achieve best outcomes. Safeguarding and promoting the welfare of children is a **duty** placed upon school and its staff to discharge its statutory functions under section 157 of the Education Act 2002

### **Individual Staff Responsibility**

If a staff member has a concern about a child, they must report these concerns on the same day without delay to the DSL or in the absence of the lead one of the other designated safeguarding staff identified in school.

NB:

Never leave the college without reporting your concerns this child could be at risk of harm.

### **Early Help**

Early help means providing support as soon as a problem emerges at any point in a child's life. The School recognises that children may benefit most from early intervention and has arrangements for listening to children and providing early help. All staff have received training (currently provided by a safeguarding trainer in person at the beginning of each school year as well as regular staff updates, led by the DSL) on the necessity to identify children who may benefit from early help, being aware of the early help process and understand their role in it. **Staff are required to speak to a DSL as soon as any concerns arise in order to discuss strategies for help and agree a course of action.** The DSL will, where appropriate, support staff and take the lead in liaising with other agencies, setting up interagency meetings or contact with services, as appropriate. If early support is identified, the DSL will take the lead in keeping this under constant review and refer the case to children's social care if appropriate. This may involve referral to specialist services.

### **The School's Independent Listener is:**

**Mrs Gaenor Loftus**

**Telephone: 07595 632290**

Mrs Loftus has been introduced to the school community in person and offers an approach for students to talk to someone who is not involved in the running of the school. The School's Independent Listener is DBS checked and provided with Level 1 Safeguarding Training. The independent listener will at times be required to forward information about a pupil to the DSL where to not do so would put the pupil at potential risk of harm.

### **Definitions of Safeguarding and Types and Signs of Abuse**

Safeguarding and promoting the welfare of children is defined in "Keeping Learners Safe" (Wales) 2020, as 'creating and maintaining a safe learning environment for children and young people, identifying where there are child welfare concerns and

taking action to address them, where appropriate, in partnership with other agencies the development of children's understanding, awareness and resilience through the curriculum'.

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

- Physical abuse
- Emotional / Psychological abuse
- Sexual abuse
- Financial abuse - this category may be less prevalent for a child but indicators could be not meeting their needs for care and support or complaints about personal property missing:
- Neglect

All staff are trained to be aware of indicators of abuse and neglect and are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse. Please see the Wales Safeguarding Procedures 2019 [hyperlink](#) below for details and definitions of the abuse categories.

[wales safeguarding procedures](#)

### **Procedures for supporting a child where concerns are identified.**

If a staff member suspects or becomes aware of an allegation or complaint of abuse or neglect from a child or any third party, they must follow the procedures below set out below. A child is likely to disclose to someone they trust: this could be any member of staff. Through training, staff are required to:

- Listen carefully
- Reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- Not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

Advice given through staff training includes the following:

- You must listen carefully to the child, be supportive and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.

- You should respond in a calm and non-judgemental way, asking questions which are open-ended e.g. Is there anything else you want to tell me? Yes? And?
- You should not ask leading questions, that is, a question which suggests its own answer. Use words: ‘Tell’, ‘Explain’, ‘Describe’, never ‘Why’. If at all possible the questions asked should be recorded.
- You should reassure the child, but never give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken.
- You must keep a sufficient written record of the conversation. This should be done immediately. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. Include any observations on noticeable non-verbal behaviour and actual words used by the child. The record should be signed by the person making it and should use names, not initials. Where a record includes an online element, staff should ensure that they do not view or forward illegal images.
- You must contact or hand the record immediately to a Designated Safeguarding Lead: Miss Rebecca Davies or one of the Deputy DSLs - Mrs Alicia Vogler, Mr Ian Lloyd, Mr Andy Allman or Mr Michael Pearson. You should not investigate the matter yourself or discuss it with a colleague.

This advice is included in Staff Induction Training and shared with all staff on appointment. Both staff induction training and ongoing staff training include courses provided by ‘educare.com’, which provides safeguarding and duty of care e-learning services. The Staff Room hosts a Safeguarding Notice Board.

**All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing on a ‘pink form’ (a form for reporting concerns, printed on pink paper).**

Whilst there is no formal layout for this, there is a structure to the form to include the date, time and place of the conversation and for the member of staff to include details of what was said by the child in the child’s own wording as far as possible. This should be signed by the member of staff, and notify the DSL this information is available to the DSL within the day the concern was brought to your attention. There should be no reason why a designated safeguarding person in school has not been notified of a concern within the same day.

Where there is a safeguarding concern, the School will ensure, as far as is possible, that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The DSL, in making decisions, will discuss with the child the actions to follow and listen to the wishes of the child during this process.

The School recognises that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and may find it difficult to develop and maintain a sense of worth. Five messages that should be conveyed to a child who has disclosed abuse are:

**“I believe you”**. Children rarely lie about abuse (especially sexual abuse) although the role of the member of staff is not to determine the validity of the disclosure.

**“It’s not your fault”**. It is always the adult’s responsibility – but the member of staff should avoid condemning the alleged abuser – especially if it is a family member.

**“I’m glad you told me”**. Children who talk about their concerns are less likely to be seriously affected.

**“I’m sorry this happened to you”**.

**“I’m going to try to help you”**. **BUT staff should NOT make promises which they may not be able to keep – especially with regard to confidentiality – disclosures must be reported and staff must not make blanket claims, e.g. they should avoid saying phrases such as “Everything will be all right”**.

The School ethos and culture encourages children in its care to raise any concerns that they might have and ensure that these are taken seriously. The School also encourages children to contribute their own ideas, according to their age and understanding, about how their safety and welfare could be further improved. This is done through the School Parliament, the School Prefect Committee, ‘check ins’ during form time, assemblies, posters around school, and the PHSE programme.

## **What Staff Should Do if they have Concerns about a Child**

### **Care and Support Referral to Children Services**

If staff (including directors, agency staff and volunteers) have any concerns about a child’s welfare (as opposed to a child being in immediate danger), known as a care and support plan (CASP) they should speak with the School's DSL to agree a course of action, although staff can make a direct referral to children’s social care. If in exceptional circumstances both the DSL and the Deputy DSL are unavailable, staff should consider speaking to one of the identified Level 3 Safeguarding Contacts. If anyone other than a DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made via e mail. If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should contact children services for an update and possible discussion with the allocated social worker / family support worker or other extended services Team Around the Family. Staff should follow up any inaction and discuss this issue with the DSL and children's social care services as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and passed to the DSL.

## **What Staff Should Do if a Child is in Danger or at Risk of Harm**

If staff (including directors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children services and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not required and can be requested unless to do so would put the child at further risk i.e. (The concern relates to a person who lives in the family home where the child ordinarily lives when not in college)

If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made by e-mail. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and passed to a DSL.

We believe that the School should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. Children should be helped to develop their behaviours in order to reduce risks and build resilience, especially in the safe use of electronic equipment and the internet. This includes resilience to radicalisation. With that in mind the School aims:

- To support the child's development in ways that will foster security, confidence and independence.
- To provide an environment in which children and young people feel safe, secure, valued and their cultural diversity is respected which encourages confidence and understanding how to approach adults if they are in difficulties believing they will be effectively listened to.
- To raise awareness in all staff, both teaching and non-teaching, of responsibilities in identifying and reporting cases and possible cases of abuse to the Designated Safeguarding Leads, or Directors, as appropriate.
- To maintain a system of monitoring of those thought to be at risk of harm, and to ensure that we, the School, contribute to assessments of need and support packages for those children.
- To promote links with other agencies such as Denbighshire Social Services and the Police with a view to developing a productive and effective partnership.
- To ensure that all adults within our School who have substantial access to children have been checked as to their suitability, as set out in the School's Application and Recruitment Policy.
- To ensure that all adults working closely with children in our school, especially those working on a one-to-one basis (e.g. visiting music teachers, sports coaches) are aware of the need to keep all actions open and clear, working within sight of other adults where possible. Closed doors should, where possible, be avoided and windows, including those in doors, should be kept clear. It is good practice to have other members of staff nearby, at least within calling distance. In general, physical contact with children should be avoided.

- To ensure that any member of another organisation, if responsible for the School's children at any time, has had the appropriate checks.
- To develop further a network of support for staff and children, through dedicated pastoral time in school and application of School pastoral systems such as tutor groups/ houses etc.

Children are taught about safeguarding through the curriculum, through PHSE. The age appropriate curriculum teaches children about the risks posed by adults and young people who use the internet and social media to bully, groom, abuse or radicalise other people, especially children and young people. The PHSE curriculum includes Relationships Education (Prep School) and Relationships and Sex Education (Senior School) in line with new mandatory Government regulations. Internet safety is embedded in the School's computing and PHSE curricula.

Staff act in loco parentis and should therefore aim to act as a reasonable parent would. Staff should be approachable and friendly but there is a line which teachers should not cross. Staff should be consistent, open and honest.

The spiritual, moral, social and cultural development of children, including a focus on British Values, is actively promoted throughout the School. This includes curriculum subjects, extracurricular activities and in the furtherance of the School's ethos through weekly assemblies, multid denominational services, themed assemblies and child elected School Parliament, Peer Mentors and the Prefect Committee.

The promotion of fundamental British Values, coined by the Prevent Strategy, aims to prevent political indoctrination of children through the curriculum. Any prejudiced views are challenged as a matter of course.

### **What Staff should do if a Child is seen as at Risk of Radicalisation**

Staff should follow the School's normal referral processes by speaking to one of the DSL immediately when there are concerns about children who may be at risk of being drawn into terrorism. There may be a referral made to Channel or children's social care depending on the level of risk. Coordinated by the police, Channel provides multi-agency support operating within a 'pre-criminal space' in order to deal with concerns proportionately.

Concerns should be reported to the North Wales Police on 0300 330 0101.

(See **Appendix 1** for indicators for the early identification of safeguarding risks to protect and divert young people away from the risks of radicalisation.)

The School, in recognition that children may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments with the Head, DSL and Directors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised. The Prevent Duty training is provided

to all staff, currently following the course provided by 'educare.com' for this purpose. Training takes place annually for relevant updates.

### **What Staff should do if they discover an Act of Female Genital Mutilation ('FGM')**

There is a specific legal duty on teachers to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. They should still discuss any such case with the DSL and involve children's social care as appropriate. (**Appendix 1** of this policy gives information about FGM and procedures to be followed where a child may be at risk.)

Anyone can report concerns about FGM to North Wales Police on the direct number 101. The national helpline is: 0800 028 3550 and [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

### **What Staff should do if a Child goes missing from Education**

Children who go missing from education, particularly on repeated occasions, is a potential indicator of abuse or neglect, including sexual abuse or criminal and sexual exploitation. The School and Boarding staff need to be vigilant and monitor and report absence from both settings there is an Admissions Register and a twice daily attendance register undertaken in school. Boarders register three times per day with a boarding Houseparent in addition to the registrations during the school day. All children are placed on both registers. Every student has at least 2 emergency contact numbers listed in Engage. As part of ongoing staff training, staff will be made aware of the need to be vigilant of signs of absence from School for potential travel to conflict zones, FGM and forced marriage. For information specific to processes for dealing with missing children from School, please refer to the School's 'Missing Pupil Policy'.

### **Children Leaving School Role - Notification to the Local Authority**

The School shall inform the local authority CME Officer 01824 -708169 – [ewo@denbighshire.gov.uk](mailto:ewo@denbighshire.gov.uk) of any child 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) (Wales) Regulations 2010 (as amended). This will assist the local authority to:

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

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any child who fails to attend school regularly, or has been absent without

the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

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

## **Allegations Against Staff – Procedures**

### **What Staff should do if they have Concerns about Another Staff Member**

If staff have concerns about another staff member, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Directors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the designated officer(s) at the North Wales Safeguarding Board. Staff may consider discussing any concerns with the School's DSL and make any referral via them.

### **What Staff should do if they have Concerns about Safeguarding Practices in the School**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding regimes, these should be raised in accordance with the School's whistleblowing procedures which can be found in the School's Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

The member of staff or volunteer should bring their concerns to the attention of one of the Designated Safeguarding Leads, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Leads, to the Head.

Where a staff member feels unable to raise an issue through the School's channels, or feels that their genuine concerns are not being addressed, other whistleblowing channels (e.g. the NSPCC whistleblowing helpline) may be open to them. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

School staff can also raise concerns in these circumstances to Denbighshire County Council Children Services and Education via Children's Gateway 01824 -712200

## **Arrangements for transition of students when changing school**



Where children leave the School, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt will be demanded.

In preparation for new students arriving at the School, the DSL will contact schools to ask for safe transferral of child protection files.

In addition to the child protection file, the DSL will consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives. Where children are open or known to children services including children who are on the child protection register and the college are part of the multi – agency plan.

### **Arrangements for Dealing with Peer-on-Peer Allegations**

All staff are made aware through training and updates that children can abuse other children. Peer-on-peer abuse is abuse by one or more children against another child. It can manifest itself in many ways and can include (but is not limited to):

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault,
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may stand alone or part of a wider pattern of abuse;
- Up-skirting – taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm;
- Sexting (youth produced sexual imagery)
- Initiating/hazing type violence and rituals.

When dealing with allegations of peer-on peer abuse, the school’s DSL will at all times pay due regard to advice in Chapter 4 of ‘Keeping Learners Safe’ (Wales) 2021.

**Sexual violence and sexual harassment:** can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. Evidence shows girls, children with SEND/ALND and LGBT children are at greater risk.

The School will ensure that all victims are taken seriously and offered appropriate support from services available local to the school.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

**Sexual violence:** Definitions of sexual violence, including rape, assault by penetration, sexual assault and consent, are made clear in the Sexual Offences Act 2003 and in ‘Keeping Learners Safe’ (Wales 2021). School staff are aware of what constitutes sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

**Sexual harassment:** When referring to sexual harassment ‘Keeping Learners Safe’ (Wales 2021) means ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media;
  - sexual exploitation; coercion and threats;
  - up-skirting (as described above) - this is now a criminal offence.

## **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a

problem in reporting sexual violence or harassment. It is important that School staff understand consent.

The DSL will, where there has been a report of sexual violence, make an immediate risk and needs assessment. Where the report pertains to sexual harassment, the need for a risk assessment will be considered. The risk and needs assessment will refer to

- the victim, especially their protection and support
- the alleged perpetrator;
- all the other children (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them.

The DSL will contact children services and make a referral where required. Any initial risk assessment within school to maintain safety will be undertaken and shared with children services.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse. **Where there is suspicion of abuse between children, the School recognises the importance of rapid investigation** (notwithstanding its duty to refer concerns without delay to children services for advice) and **protection of all parties involved**. This may include separation and additional supervision. Victims of peer-on-peer abuse will be supported by the School in the same way as for all allegations of abuse. The School also has an Anti-Bullying Policy.

The possibility of peer-on-peer abuse is minimised by:

- an open atmosphere of mutual trust among the boarding community;
- experienced boarding staff;
- good staffing provision and supervision;

Although relationships may develop, the School forbids sexual acts between children at School. The School aims to keep such incidents confidential from other children, but will always refer concerns to children services where appropriate.

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

A child against whom an allegation of abuse has been made may be suspended from the School during the investigation.

The School will take advice from children services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all children involved including the alleged victim and perpetrator. If it is necessary for a child to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of children services parents are informed as soon as possible and that the children involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an

important consideration for the School and advice will be sought as necessary from the children services and/or directly with the Police, as appropriate.

In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported through the School's pastoral network of DSL/Heads of House/Form Tutors/Independent Councillor, as necessary, and support from external agencies will be sought, as appropriate.

**Sexting:** Under British law it is legal to have sex aged 16 and over. But it is illegal and a serious criminal offence to take, hold or share indecent photos of anyone aged under 18 – even if the person who has the image is under 18 themselves. It also does not matter whether they are boyfriend or girlfriend. Not only could the person be prosecuted, but they could be required by law to register as a sex offender.

When an incident involving youth produced sexual imagery is brought to a member of staff's attention, they should refer the incident to the DSL immediately. The DSL may then call a review meeting with relevant member(s) of staff, before speaking to the children involved. Parents should be informed as early as possible in the process unless there is a sound reason not to do so, e.g., if the child could be harmed as a result.

If there is a risk that the child has been harmed or is at risk of harm a referral should be made immediately to children services and/or directly to the Police. This referral will be undertaken by the DSL lead or other safeguarding designated staff.

### **Arrangements for Dealing with Allegations of Abuse against Teachers and Other Staff (including the Head, Directors and Volunteers)**

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in an education setting is dealt with fairly, quickly and consistently. In a way that provides effective protection for a child and at the same time supports the person who is subject to the allegation.

The School's procedures for managing allegations against staff who are currently working in the School follows the guidance Welsh Government Handling Allegations of Abuse against teachers and Staff April 2014 (see Link above to full guidance document)

The guidance addresses matters where school staff may have behaved in a way that has harmed a child, or may have harmed a child;

- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child in a way that indicated that they would pose a risk of harm if they were to work regularly or closely with children.

If an allegation is made against anyone working with children in the School, the School **will not undertake their own investigation** of allegations without prior consultation with the Local Authority Designated Officer (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In some cases, the School may first discuss informally with the Designated Officer to seek immediate advice.

All allegations will be investigated as a priority to avoid any delay.

1. All allegations which appear to meet any of the above reporting criteria are to be reported straight away to the Head or to a DSL. If an allegation is reported to the DSL, the DSL will keep the Head informed and vice versa. Where the Head or DSL is absent, reports may be made directly to the Senior Leadership Team. Where the Head or DSL is the subject of the allegation or concern, reports must be made to the Directors. **In this instance the Head / DSL must not be informed of the allegation prior to contact with the Directors and Local Authority Designated Officer (LADO).**

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

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

4. The Head should give careful consideration as to whether the circumstances of the case warrant suspension as a “neutral act” put in writing pending further enquiries by agencies and school or whether alternative arrangements should be put in place until the allegation is resolved. He will give due weight to the views of the LADO and Welsh Government Guidance above [Hyperlink](#)) when making a decision about such matters. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.

5. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.

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

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

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

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

Allegations found to be malicious will be removed from the individual's personnel records and destroyed and informed of this action formally in writing by the school. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with the Welsh Government 'Handling allegations against teaching and school staff guidance April 2014 and a copy will only be provided to the individual concerned.

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

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

### **Staff Code of Conduct (Staff Handbook)**

The School's code of conduct can be found in the Staff Handbook. The aim of the code of conduct is to provide clear guidance about behaviour and actions so as to not place children or staff at risk of harm or of allegation of harm to a child.

### **Safer Recruitment**

The School is committed to safer recruitment processes. Members of the teaching and nonteaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate.

A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

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

The School's protocols for ensuring that any visiting speakers, whether invited by staff or children themselves, are suitable and appropriate supervised are set out in the Staff Handbook.

### **Management of Safeguarding**

The School's DSL is Miss Rebecca Davies and the four Deputy DSLs are Mr Andrew Allman, Headmaster, Mr Ian Lloyd, Senior Deputy Headmaster, Mrs Alicia Vogler, Deputy Headmistress and Mr Michael Pearson, Assistant Headmaster. All are members of the Senior Leadership Team.

In the absence of the DSL, the deputies will act. For out of School activities/hours, staff will contact either DSL, initially by phone or email, in order to discuss safeguarding concerns, should they arise.

The DSL's contact details can be found within the Key Contacts section at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School and boarding arrangements, and pupil's online safety. The DSL's

responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice, acting as a source of support, advice and expertise for all staff. The DSL works with the Directors to review and update the School's Safeguarding Policy. Where a child leaves the School, the DSL will also ensure their safeguarding file is transferred to the new school (separately from the main child file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL regularly reviews the School's and their own practices by way of ensuring they are current with legislation, guidance and local safeguarding procedures together with ensuring school staff receive and maintain safeguarding training.

During term time, the DSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements are that the DSL can be reached by mobile phone daily and the most appropriate or most easily available DSL will respond to and deal with any incident immediately, contacting the Headmaster if and as necessary. Personal mobile telephone numbers for both DSL and Deputy DSL are kept in the School offices and may be used in out of hours/out of term times.

Full details of the DSL's role can be found in Chapter 2 of 'Keeping Learners Safe' (Wales Apr 2021.)

Ultimate lead responsibility for safeguarding and child protection remains with the headmaster not DSL and this responsibility should not be delegated.

## **Training**

All induction and training are in line with current legislation and Guidance in Wales via the Welsh Government.

## **All Staff**

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

- the safeguarding policy, including information about the identity and role of the DSL.
- the staff code of conduct, including the School's whistleblowing procedure and the ICT acceptable use policy, staff/child relationships and communications including the use of social media (Staff Handbook)
- a link to the document 'Keeping Learners Safe' (WG Guidance Apr 2021)
- School leaders and staff who work directly with children will also be required to read and understand Chapters 1 and 2 of 'Keeping Learners Safe' (WG Guidance 2021)



Copies of the above documents are provided to all new staff during induction and are readily available on the Staffroom Safeguarding Notice Board and the policy through the School Website.

All staff are also required to:

- Read Chapters 1 and 2 of 'Keeping Learners Safe' (Welsh Gov.) and confirm that they have done so Each time Part One of 'Keeping Learners Safe' (Wales Guidance Apr 2021.) is updated by the Welsh Government, staff will be updated on the changes via staff training during INSET or staff meetings.
- Understand key information contained in Part One of 'Keeping Learners Safe'. The DSL will ensure understanding by staff by delivering appropriate training at INSET or ordinary/extraordinary staff meetings. All staff will sign a document confirming that they have read and understood Chapters 1 and 2 'Keeping Learners Safe'.
- Receive training in safeguarding and child protection regularly, in line with advice from the Denbighshire Safeguarding Team. The School uses 'educare.com' online training, together with regular staff updates, to deliver much of this training. Training will include online safety. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails, staff meetings and training at INSET.

### **Training and Updates for DSLs**

The DSLs receive updated child protection training at least every two years to provide them with the current knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children through a care and support plan (CASP) identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children and training in the approach to Prevent duties. Further details of the required training content for the DSL are set out in Chapter 4 of 'Keeping Learners Safe' guidance.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually, to keep up with any developments relevant to their role, through attendance at courses, conferences, meetings, emails etc.

### **Oversight of Safeguarding, Including Arrangements for Reviewing Policies and Procedures**

A review of the School's safeguarding policy takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The

working of this policy will be monitored by the DSL in the School who will report as required to the management team of the school.

The School Senior Leadership Team will undertake an annual review of the School's safeguarding policies and procedures together with a review of the safeguarding incidents that have arisen and how they were managed. This policy will also be reviewed as necessary to reflect changes in legislation, guidance and practice. This process is carried out to ensure that the School is continuing to provide the very highest standard of safeguarding possible.

Any deficiencies or weaknesses identified in this policy or in any of the School's safeguarding arrangements will be remedied without delay.

The mechanisms for change in practice are formulated with staff through training updates and pastoral meetings (House meetings etc.) and changes in practice added to/ altered within the Staff Handbook. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

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

## **The School's Arrangements to Fulfil Other Safeguarding Responsibilities.**

### **Teaching children how to keep safe**

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

Internet safety is an integral part of the School's Computer Science curriculum and also embedded in PHSE, including sex and relationships education.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The School subscribes to an internet filtering system with the facility to control and filter website content deemed inappropriate. Time available for use of the internet is controlled according to age. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others and help manage online behaviour that can increase a child's likelihood of, or causing, harm. Further detail of the School's approach to online safety can be found in the School's IT & Communications Policy, ICT Acceptable Use Policy, Photographs and Digital Images Policy, and Social Media Policy which include detail on the use of mobile technology in School (and accessing 3G and 4G technology on school premises) and the School's IT arrangements to ensure

that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

### **Looked after children**

The Senior Leadership Team will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Miss Rebecca Davies is the designated member of staff who has responsibility for their welfare and progress. The School will ensure that the designated member of staff receives appropriate training in order to carry out their role.

The school will liaise when necessary with the LAC Education Liaison Officer in Denbighshire County Council to seek advice and support beyond the school scope of supporting LAC pupils.

LAC Education Liaison Officer Contact No: 01824 – 71 2910

### **Arrangements for Visiting Speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable, detailed in the School's Visitors Policy & Procedures (School Day & Extra-Curricular) and the Visitor Policy & Procedures (Boarding). The School's responsibility to children is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

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

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

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers may be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy. Unsupervised volunteers whose presence is regular and frequent will be subject to the usual DBS checks.

## **Off-site tuition**

Please refer to the School's 'Educational Visits Policy' for details regarding additional measures taken to safeguard children for off-site tuition or performances away from the School.

## **Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's IT & Communications Policy, Social Media Policy, ICT Acceptable Use and Photographs and Digital Images policy.

## **Equal Opportunities**

In meeting its safeguarding obligations the School will be mindful of the obligations under the Equality Act 2010, which covers discrimination against a child or prospective child on grounds of sex, race, caste, disability, religion or belief, sexual orientation, gender reassignment, pregnancy or maternity. All staff, volunteers and Directors with responsibilities under this policy must take into account the Equal Opportunities Policy when discharging their duties.

Children with a special educational needs and/or disability (SEND/ALND) can face additional safeguarding challenges, including communication barriers and difficulty in overcoming these. Staff should guard against the assumption that certain behaviours, moods and injuries necessarily pertain to the child's disability without the need for further exploration and be aware that behaviours such as bullying may impact disproportionately upon a child with SEND/ALND without them necessarily displaying signs of this.

## **The use of 'reasonable force' in School**

All Staff are required to undertake training in Use of Reasonable Force in School. The Level 2 course meets the national approved police standards.

Under section 93 of the Education and Inspections Act 2006 all school staff are able to use such force as is reasonable in the circumstances to prevent a child or young person from doing, or continuing to do, any of the following:

- committing any offence (or, for a learner under the age of criminal responsibility, what would be an offence for an older learner);
- causing personal injury to, or damage to the property of, any person (including the self- harm to the learner);
- prejudicing the maintenance of good order and discipline at the school or among any learners receiving education at the school, whether during a teaching session or otherwise.

There are circumstances when it is appropriate for staff in Schools to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between students or blocking a student’s path, or active physical contact such as leading a student by the arm out of the classroom.

The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances. Wherever possible no individual staff member will use reasonable force unless supported by a fellow staff member with a pupil.



Welsh Government  
Guidance - Handlin

## **APPENDIX 1 – INDICATORS OF ABUSE AND NEGLECT**

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

**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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

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

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

**Contextual Safeguarding:** Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so the school will provide as much information as

possible as part of any referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

**Child Exploitation:** is a form of sexual and criminal exploitation where children are sexually exploited for money, power or status and or enticed in to criminal activity. It can involve violent, humiliating and degrading sexual assaults or threats of violence. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Similarly, a child can be exploited to perform criminal acts including drug trafficking “County Lines” activity and enticed in to a gang culture which could criminalise the child. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children have money from unknown sources
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late;
- and;
- Children who regularly miss school or education or do not take part in education.

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

### **Child Criminal Exploitation: County Lines and Gangs**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines and gang activities are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

County lines and gang exploitation can:

- affect any child or young person (male or female) under the age of 18
- still be exploitation even if the activity appears to be consensual
- involve force and/or enticement-based methods of compliance – often accompanied by violence or threats of violence
- be perpetrated by individuals or groups, males or females, and young people or adults

- be typified by some sort of power imbalance in favour of those perpetrating the exploitation.

Age may be the most obvious, but the power imbalance may also include gender, cognitive ability, physical strength, status and access to economic or other resources. Where a victim may have been trafficked for the purpose of transporting drugs the school will consider a referral to the National Referral Mechanism:

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-andassessment-forms>

**Serious Violence:** Indicators that children are at risk from, or involved with serious violent crime may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Advice for schools is provided in

<https://www.gov.uk/government/publications/advice-toschools-and-colleges-on-gangs-and-youth-violence> and

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-andvulnerable-adults-county-lines>

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

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

If staff have a concern that a child may be at risk of FGM, they should speak to the DSL immediately.

There is a specific legal duty on teachers. If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

**Anyone can report concerns about FGM to North Wales police on the direct number**



101.

**The national helpline is:** 0800 028 3550 and [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: **020 7008 0151** or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme. Channel is part of the Prevent strategy. The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism.

'Prevent' training will be undertaken every two years by all staff in school, as part of the 'Emtrg.com' online package.

**Special Educational Needs and/or Disabilities:** Children with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

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

## **APPENDIX 2 – GLOSSARY OF TERMS AND ABBREVIATIONS**

**ALND** – Additional Learning Need and Disability

**CAMHS** – Child and Adolescent Mental Health Services

**Channel** - part of the Prevent strategy. The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism.

**CASP** – Care and Support Plan (Child in Need)

**CSE** – Child Sexual Exploitation

**DBS** – Disclosure and Barring Service

**DfE** – Department for Education

**DSL** – Designated Safeguarding Lead – staff in School with chief responsibility for safeguarding.

**Early Help** – providing support as soon as a problem emerges, at any point in a child’s life, from foundation years through to teenage years.

**Emtrg.com** - e-learning service providing a broad range of safeguarding and duty of care training for every member of staff in an educational setting.

**Estyn** – The Educational and Training Inspectorate for Wales (‘esteem’ comes from the Welsh Language verb meaning “to reach, stretch or extend”).

**FGM** – Female Genital Mutilation

**HBV** – Honour Based Violence

**‘Keeping Learners Safe’ (Welsh Gov)** – ‘Keeping Learners Safe’ (Welsh Gov) 2015 – Department for Education statutory guidance.

**LGBT** – Lesbian, Gay, Bisexual, Transgender

**Ofsted** - Office for Standards in Education, Children’s Services and Skills, which inspects and regulates services that care for children and young people, and services providing education and skills for learners of all ages.

**Prevent duty** - The [Counter-Terrorism and Security Act 2015](#) contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism. This is also known as the Prevent duty.

**PSHE** – Personal, Social and Health Education (curriculum subject in School)

**SEND** – Special Educational Needs and Disability

**SLT** – the School’s Senior Leadership Team

**TRA** – Teaching Regulation Agency, within the Department for Education (formerly the National College for Teaching and Leadership)

**UKCCIS** – UK Council for Child Internet Safety

**WG** – Welsh Government

Wales Safeguarding Procedures 2019 Hyperlink

<https://gov.wales/safeguarding-guidance>

### **APPENDIX 3 – Keeping Learners Safe – Guidance April 2021 (Welsh Government).**



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### **Keeping Learners Safe - School Audit Tool**



WG Safeguarding  
audit tool for schoo

**This document can be also accessed from the Welsh Government’s Website: <https://gov.wales>**