Myddelton College

Safeguarding and Child Protection Policy

Date policy reviewed	September 2023
Reviewed & approved by	BPD, AJA & Governors
Next review	September 2024

Index

9. Arrangements for transition of students to another school
a) Where children leave the school
b) New children transferring to Myddelton College

10. Procedures for dealing with Child on Child Abuse allegations
a)   Staff are made aware that children can abuse other children
b)   Staff and pupils being vigilant and responsive
c)   Sexual violence and sexual harassment
d)   Response to a report of sexual violence and sexual harassment
e)   Contact with Children's Services
f)   Anti-Bullying Policy
g)   Investigation procedures
h)   Support for alleged victim and perpetrator
i)   Sexting

11.   Arrangements for dealing with allegations of abuse against teachers and other staff (including the Headmaster, Directors, Governors, and volunteers)
a) First stage
b) Following guidance
c) Investigations following consultation with LADO and/or Police
d) Allegations or concerns about the Headmaster or DSL
e) Procedure for investigating allegations

12. Staff Code of Conduct (Staff Handbook) matters
a) Safer Recruitment
b) Management of safeguarding
c) DSL's responsibilities
d) Training in safeguarding and child protection, to include updates
e) The School's arrangements to fulfil other safeguarding responsibilities
    i) Teaching children how to keep safe
    ii) Looked After children
    iii) Arrangements for visiting speakers
    iv) Off site tuition
    v) Use of mobile phones and cameras
    vi) Equal Opportunities
    vii) The use of 'reasonable force' in School

13. Appendices

Appendix 1   Key external contacts (continued) / Policy advice & guidance

Appendix 2   Indicators of abuse and neglect
1. Abuse
2. Special safeguarding issues
3. Contextual safeguarding
4. Child exploitation
5. Child criminal exploitation - County lines and gangs
6. Serious Violence
7. FGM
8. Forced marriage
9. Radicalisation
10. Special educational needs and/or disabilities

Safeguarding and Child Protection Policy

1. The legal framework

This whole-School policy applies to Myddelton College ('the School') which includes Myddelton College Preparatory School and Boarding Houses.

The policy is updated annually in accordance with 'Keeping Learners Safe' (Wales) Welsh Government Guidance for Schools and Colleges including Independent Schools (Wales): April 2021 last updated) and Wales Safeguarding Procedures 2019. Both documents are available on the School's website.

Ensuring the annual review of the policy is the responsibility of the DSL, as is the regular review of the procedures and implementation of the policy. These reviews will be undertaken with the Headmaster and the Governing Body; they will have the opportunity to ask appropriate questions and seek elaboration of review conclusions.

a) 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.

The school will ensure that arrangements to safeguard and promote the welfare of pupils at the school have regard to all related guidance issued by the Secretary of State for Wales.

The school's policy recognises that the best interests of the child are paramount to enable children to have the best outcomes. For this reason, the school recognises safeguarding and promoting the welfare of children are everyone's responsibility within 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.

b) Boarding responsibilities and arrangements

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

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 WelshGovernment 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.

c) Registration / DBS checks of School staff

All staff who work or volunteer at the School are required to have an Enhanced DBS certificate.

d) Glossary of terms and abbreviations used in policies

This can be found in Appendix 2 at the end of the document.

e) School Safeguarding Audit Tool – Keeping Learners Safe Guidance (Apr 2022)

The Audit tool, linked to the Welsh Government "Keeping Learners Safe" Guidance 2022, has been provided to assist schools in evaluating their safeguarding procedures, processes and systems and to identify areas for school improvement.

The 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 will also be discussed and actions and areas for improvement agreed with the Directors and Governing Body of the College.

The Audit tool is attached in Appendix 3.

2. Governance Oversight of Safeguarding and Child Protection

a) Commitment of Directors and Governors to safeguarding and child protection

Myddelton College's Directors and Governors are committed to safeguarding and promoting the welfare of children. They believe that all pupils, regardless of age, special needs or disability, racial/cultural heritage, religious belief or sexual orientation have the right to be protected from all types of harm and abuse. This Policy is addressed to every member of staff, Directors and Governors, and volunteers at the School (temporary or permanent).

Safeguarding and promoting the welfare of children are everyone's responsibility in Myddelton College. The Directors and Governing Body, and SLT recognise they must ensure a whole school approach to safeguarding, and ensure safeguarding and child protection are at the forefront of School life and underpin all relevant aspects of process and policy development.

In addition, the school will ensure that all pupils, and their parents are made fully aware, from information provided for parents and carers, and teaching and learning in school for pupils, of the paramount importance of safeguarding and child protection.

While the primary requirement is to notify the Local Authority Designated Officer (LADO)/Children's Social Care, the School will also notify the Directors and/or Chair of Governors of any serious safeguarding issues.

The School carries out the mandated checks on the suitability of all people who serve on our School Governing Body. The members of the Governing Body with specific safeguarding responsibility are Mr David Ewart, assisted by Mrs Mary Tetley.

Chair of Governors:
Mr David H Ewart,
8 Raby Ave., Barnard Castle, Co Durham, DL12 8AJ
Tel: 01833 637433 email: ewartdv@btinternet.com

Governor:
Mrs Mary Tetley.

Headmaster:
Mr Andrew J Allman,
Headmaster's House, Myddelton College, Peakes Lane, Denbigh, North Wales
Tel: 01745 472201 email: a.allman@myddeltoncollege.co.uk

b) Involvement

All members of the leadership executive recognise the best interests of the child are paramount to enabling children to have the best outcomes. This important message, endorsed by the leadership executive, is articulated regularly to staff and pupils, and parents.

Safeguarding and promoting the welfare of children is everybody's responsibility. Directors and Governors, and senior leaders, ensure through regular communication, that a whole school approach to safeguarding is adopted that safeguarding and child protection are at the forefront front and underpin all relevant aspects of process and policy development.

Governors meet at least once each term with the Designated Safeguarding Lead to receive briefs and updates, as well as having the opportunity to ask appropriate questions. In addition, they receive written and verbal reports about Safeguarding checks and audits which they have been undertaken in school.

The Headmaster and/or Governors may choose, at any stage, to report to Mr Ewart and/or Mrs Tetley, Governors with an oversight of Safeguarding, in particular any safeguarding audit of the college and any contribution actions they may introduce from this work together with any matters relating to Safeguarding which have been referred to them, including allegations against staff.

The working of this policy will be monitored by the Designated Safeguarding Lead in the School and will report to the Headmaster.

Reviews of procedures, and the review of safeguarding incidents that have arisen and how they were managed, will be undertaken by Mr Ewart and Mrs Tetley during the Easter Term and at any other appropriate times during the year if such incidence occurs. A written report will be submitted to Governors and presented for consideration at the Governors' Meeting in March annually, or at any other time as requested, as the formal review of the school's child protection policy and practices.

These reviews will be used to reflect on 'What has been learnt?' and 'How can we strengthen safeguarding and child protection practices further?'

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 child protection arrangements or safeguarding audit, will be remedied without delay.

This policy is available publicly on the school's website and will be supplied to parents or their representatives, as a hard copy, on request.

The views and opinions of all staff are invited in the framing and update safeguarding and child protection policy. Their contribution is extremely important to ensure the relevance of the policy and practices, and to ensure safeguarding is embedded in the life and culture of the school.

This will be particularly important should there have been a substantial allegation made against a member of staff in school.

c) Site security and arrival/departure of visitors

The SLT and Governors review site security at least once each year.

Inner Core
- The five entry points to the inner core of the campus are open during the working day and are closed/opened, as published.

- **All members of school must challenge any visitor to the school who is not wearing a visitor badge and lanyard**.
- Visitors are required to sign in at the school office on arrival to obtain the visitor badge and lanyard. 8
- Should a visitor refuse to return to the school office immediately to sign in, a member of staff must be informed immediately.
- School office: the Secretary will issue a safeguarding leaflet which needs to be read before a visitor signs in and receives a visitor LAN yard.
- When signing in, the visitor commits to practise and uphold safeguarding procedures operating on site.
- This numbered lanyard must be returned to the school office when the visitor departs.
- Visitors wishing to enter the inner core of the site outside school hours must sign in at one of the boarding Houses.
- There is a protocol for boarders who wish either to welcome visitors to the boarding community or who wish to leave the school campus; this information can be obtained from any member of the boarding community staff. Details are published at the entry point to each of the boarding Houses.

The outer core campus is evident and identified to school staff and pupils. Any person who is not a member of staff or student body must be politely advised that the outer core campus is private property and asked to leave.
Anyone who does not leave is trespassing and must be reported immediately to a member of the school staff.

3. Key Contacts

a) Designated Safeguarding Leads (DSL) within the School:

PLEASE NOTE
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.

b) Personnel

Designated Safeguarding Lead: Mr Mike Pearson**,**
Deputy Headmaster, Head of Pastoral and member of the Senior Leadership Team
m.pearson@myddeltoncollege.co.uk
01745 472201 (school hours)

Deputy Designated Safeguarding Leads:

Mr Andrew Allman,
Headmaster
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
01745 472201

Mr Ian Chan
Head of Boarding and member of the Senior Leadership Team
i.chan@myddeltoncollege.co.uk
01745 472201

Mrs Katie Gresley-Jones
Head of Preparatory School and member of the Senior Leadership Team
k.gresley-jones@myddeltoncollege.co.uk
01745 472201

In the absence of the DSL, one of the Deputy DSLs 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.

c) Key External Contacts in Denbighshire:

In an Emergency, always ring 999.

Education Safeguarding Officer,
Denbighshire County Council. Contact No: 01824 708169

Denbighshire County Council Safeguarding Team Access
Email: 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 Referr

Email the Referral Form to: cfsgateway@denbighshire.gov.uk

d) Contact details for the Local Authorities of students living in other Counties:

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

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

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

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 exits. If the pupil is from another Local Authority or is 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

Further key external contacts can be found in Appendix 1.

4. 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 wellbeing of children.

The DSL will ensure that everyone working in the education setting is aware of the Wales Safeguarding Procedures and can access the procedures in the School.

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 the School and its staff to discharge its statutory functions under section 157 of the Education Act 2002.

a) Individual staff responsibility - Immediate Risk Child Protection Consideration

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 DSL, one of the Deputy Designated Safeguarding Leads, identified in school. If staff are unsure, they should always speak to the DSL (or Deputy DSL).

NB: Never leave the School without reporting your concerns; this child could be at risk of harm.

All members of staff need to recognise their responsibility for listening to children; not only should they respond when a child indicates that a problem exists, by offering an early

opportunity to listen to concerns, but also remember that confidentiality must not be guaranteed and that concerns and disclosed information must be passed to the DSL in writing as a priority.

In addition, the school trains 'peer support listeners' so that pupils recognise their involvement in supporting those who choose to share their concerns, and particularly safeguarding concerns.

b) Consideration of a Care and Support referral to Children's Services:

If staff (including Directors, Governors, agency staff and volunteers) have any concerns about a child's welfare (as opposed to a child being at immediate risk of danger then a CASP - care and support plan may be a consideration), they should speak with the School's DSL to agree a course of action. Staff could make a direct referral to Children's Social Care if they deem this to be more appropriate parents should be made aware of such referrals.
If, in exceptional circumstances, both the DSL and the Deputy DSL are immediately unavailable, staff should speak to one of the identified Level 3 Safeguarding Contacts.

If a child's situation does not appear to be improving, the DSL (or the person who made the referral) should contact Children's Services for an update and possible discussion with the allocated social worker / family support worker, or other Extended Services Team Around the Family.

c) 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 school staff should be ready and prepared to identify children who may benefit from early help, be aware of the early help process, and understand their role in it. This early help might and/or can reduce the extent of further harm. Every experience is different for any individual regardless of gender. The identification of a child being exploited however is similar in that the matter needs to be investigated.

All staff have been advised that abuse, exploitation, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. In addition staff are made aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/can occur between children outside these environments.

If early help is appropriate, the DSL will support staff in liaising with other agencies and in setting up an inter-agency assessment as appropriate.

Where early help or other support are appropriate, the case should be kept under constant review and consideration given to referral to children's social care if the child's situation does not appear to be improving.

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.

All 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 inter-agency 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.

d) The School's Independent Person:

> Jo Davies
> Telephone: 07851706262

Jo Davies 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 person is DBS checked and has completed Level 1 Safeguarding Training. The independent person will, at times, be required to forward information about a pupil to the DSL where not to do so would put the pupil at potential risk of harm.

5. Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined in **"Keeping Learners Safe" (Wales)' 2022,** as

> 'Safeguarding is preventing and protecting children from abuse, neglect or other kinds of harm, and educating those around them to recognise the signs and dangers. Safeguarding and promoting the well-being of all children attending an education setting is defined for the purposes of this guidance as:
> - protecting children from risk of abuse, neglect or other kinds of harm
> - preventing impairment of children's health or development
> - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
> - taking action to enable all children to achieve the best outcomes.'

a) Defining abuse

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

- Physical abuse (Serious Violence: KCSIE 51-52)
- Emotional / Psychological abuse (KCSIE 28) **14**
- Sexual abuse (KCSIE 29)
- 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

Exploitation is a form of abuse: it involves being groomed, forced or coerced into doing something that you don't want to do for someone else's gain. It is a complex and hidden issue. People who are being exploited can find themselves in situations where they experience abuse and violence, and may be forced to take part in criminal activities.

Neglect is a form of abuse: 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 (KCSIE 30).

It is important for staff to be aware of all the types of abuse so they can identify cases of children who may be in need of help or protection.

b) Staff training

All staff are trained to be aware of indicators of abuse, exploitation and neglect, and are referred to Appendix 2 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](#)

All school staff members must be aware of the types of abuse, exploitation and neglect so that they are able to identify cases of children who may be in need of help or protection.
Staff should also be aware that they must both be vigilant about other specific safeguarding concerns, such as:

- children missing education,
- domestic abuse,
- child on child abuse,
- sexual violence and sexual harassment,
- serious violence,
- female genital mutilation, (FGM)
- child sexual exploitation, (CSE)
- child criminal exploitation, (CCE)
- mental health,
- radicalisation,
- county lines,
- so-called honour based abuse,
- homelessness,
- children missing education,
- forced marriage

Staff are made aware of specific safeguarding issues including that behaviours linked to drug taking, alcohol abuse, truancy and sexting children in danger.

The use of corporal punishment in Myddelton College is forbidden. The encouragement of corporal punishment by parents, whatever the reason or occasion, will be treated as an urgent safeguarding matter, with immediate referral to the DSL or Headmaster.

In addition, staff should consider carefully **the context** of any safeguarding concerns and be aware they can be associated with factors outside school. Where in doubt or where there in insufficient 'known' information, staff should report their concern to the DSL.

Staff should also be aware that technology is a significant component in many safeguarding and well-being issues; their vigilance when overseeing use of technology will be an important component of safeguarding though they must be careful not to infringe an individual's privacy whilst being vigilant

6. 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 for a child, or any third party, they must follow the procedures below set out below.

a) Child making a disclosure:
A child is likely to make a disclosure to someone they trust: this could be any member of staff or potentially another child.

(Should the adult receiving the disclosure be unable, for any good reason to include being the teacher parent of the child, then it is of appropriate to seek the immediate support of the DSL or a Deputy.)

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.
- As far as possible, the child's wishes should be taken into account when determining what action to take and what services to provide.
- Ensure two members of staff are present and involved should a child choose to disclose details of harmful sexual behaviour.
- The wishes of the victim in terms of how they want to proceed in the disclosure period, are especially important in the context of sexual violence and sexual harassment.

b) 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 'And?'
- You should not ask leading questions, that is, a question which suggests its own answer. Allow the child to express their views and give encouraging, gentle feedback.
  - o Use words like: 'tell', 'explain', 'describe'.
  - o Never ask 'why'.
  - o If at all possible, the questions asked and answers should be recorded.
- You should reassure the child but never give a guarantee of absolute confidentiality.
  - o 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 written record:

This written record should be clear and comprehensive, and should record all matters discussed, concerns, decisions and reasons for the decisions.

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.

It should include any observations on noticeable non-verbal behaviour and record 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: Mr Mike Pearson or one of the Deputy DSLs – Mrs Katie Gresley-Jones, Mr Ian Lloyd, Mr Andy Allman or Mr Ian Chan.

You must **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 Data Protection Act 2018 or the UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

The written record and all notes, which must remain confidential, must be passed in their entirety to the DSL who will ensure the information is kept securely and safely, prior to sharing the information or folder with appropriate agencies and the Police.

The information or folder must only be accessible to those who need to see the information and will be shared only with appropriate agencies and Police.

Hard copies of documents must be locked away securely by the DSL; all on-line 'saved' folder materials should be password protected by the DSL.

c) Staff Room Safeguarding notice board:

All staff should familiarise themselves with standing notices and check the Board daily for important notices, to include updates from the DSL.

d) Records:

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 using the child's own wording as far as possible.

This form should be signed, and dated with times, by the member(s) of staff who will ensure this information is available to the DSL within the day the concern was brought to their attention. There should be NO reason why a Designated Safeguarding Lead 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. For this reason, a post-disclosure plan for their care must be created, detailing agreed support measures in the first instance.

e) Five messages which should be conveyed to a child who has disclosed abuse:

"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's 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.

f) Actions where there are concerns about a child:

Flowchart:

School/college action (solid red box key)
Other agency action (dashed blue box key)

Staff have concerns about child and take immediate action. Staff follow their child protection policy and speak to designated safeguarding lead[1]

↓ ↓

- Referral not required, school/college takes relevant action, possibly including pastoral support and/or early help[2] and monitors locally
- Referral[3] made if concerns escalate
- Designated safeguarding lead or staff make referral[3] to children's social care (and call police if appropriate)

Within 1 working day, social worker makes decision about the type of response that is required

- Child in need of immediate protection: referrer informed
- Section 47[4] enquiries appropriate: referrer informed
- Section 17[4] enquiries appropriate: referrer informed
- No formal assessment required: referrer informed

- Appropriate emergency action taken by social worker, police or NSPCC[5]
- Identify child at risk of significant harm[4]: possible child protection plan
- Identify child in need[4] and identify appropriate support
- School/college considers pastoral support and/or early help assessment[2] accessing universal services and other support

Staff should do everything they can to support social workers.
At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required), and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
[5] This could include applying for an Emergency Protection Order (EPO).

7. Allegations against staff – procedures

All staff are advised to follow the staff code of conduct to ensure they keep within the boundaries of conduct laid down by the school in the policy.

By doing this, they will protect themselves more effectively from any potential allegations.

This is particularly relevant to those members of staff who are engaged in close one-to-one teaching, particularly in specialist performing arts or sports provision, or in one to one tutorial work, or on occasions when it is necessary to offer or give close support.

a) Staff concerns about another staff member:

If staff have concerns about another staff member (including agency staff, volunteers and contractors), these should be referred to the Headmaster immediately.

Where there are concerns about the Headmaster, this concern should be referred either to the Directors or Governors. In the event of allegations of abuse being made against the Headmaster, staff should refer 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.

Where a referral is made a case manager will be assigned as a key contact for communication between school and investigation agencies. This case manager will also act as the support and link to the member of staff who the allegation relates to throughout any investigation and subsequent referral to the education workforce council.

b) Staff concerns about safeguarding practices in the school:

The School aims to ensure there is a strong culture of both safeguarding and protection of all children's welfare and safety.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime, and know that such concerns will be taken seriously by the Senior Leadership Team.

Raising concerns and adopting an attitude of 'it could happen here' are both thoroughly responsible. Where staff have concerns about poor or unsafe practices, and/or 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 Headmaster.

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 in Annex 1 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).

c) Low Level Concerns Policy

There could be Low Level Concerns about a member of staff's behaviour or manner which give rise to a safeguarding concern. Such concerns can exist on a wide spectrum.

Areas of school life which may be more likely areas for concerns to originate:
staff/pupil relationships and communications,
use of technologies,
use of social media,
one-to-one tuition,
individual music lessons,
sports' coaching,
outdoor pursuits,
conveying a pupil by car,
engaging in electronic communications with pupils,

- and in the boarding Houses, and individual study bedrooms.

However, vigilance must be exercised in all areas school life.

The school provides guidance and advice in policies linked to each of these areas of school life. Staff are advised and required to ensure that they are familiar with the guidance contained therein.

The purpose of the Safeguarding and Child Protection Policy, and the Staff Code of Conduct Policy is to create and embed a culture of openness, trust and transparency.

The low level concerns policy is important as it includes concerns which do not meet the harm threshold of a safeguarding concern but need to be shared responsibly and with the right person (Headmaster and/or DSL), and recorded and dealt with appropriately.

Should this arise, or be the case, a responsible and appropriate response, on every occasion, will be to report this concern to the Headmaster.

Staff who make their concerns known are acting thoroughly responsibly; their concern could act as an amber warning light in cases where there could be substance. It could also achieve the purpose of addressing unprofessional behaviour and supporting the individual to correct this behaviour at an early stage.

This disclosed information will be recorded and will then either be dealt with accordingly or the information will be retained for reference.

The Headmaster will bring the information to the attention of the SLT, and Governors as appropriate.

In addition, the Headmaster will decide whether to refer the matter to the DSL, and LADO/Police, for advice or action. The Headmaster, with the advice of the DSL, will share any patterns of concerning, problematic or inappropriate behaviour with the appropriate agency.

Should the member of staff about whom a low level concern has been made choose to apply for alternative employment in another school, the Headmaster will consider carefully whether or not low-level concerns should be mentioned in the school's reference.

It is important that the SLT, Directors and Governors create a culture that safeguards and promotes the welfare of children in the school. They will adopt robust recruitment and reference writing procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in other schools and colleges, as well as their own. To this effect, they will follow their written recruitment and selection policies and procedures, and adhere to statutory responsibilities for checking staff working with children.

Should a low level concern be reported about supply or agency staff, about volunteers or contractors, the Headmaster will share this information with the organisation responsible for their employment in addition to taking appropriate action to safeguard children within the school.

All those who come into contact with children in Myddelton College are required to have ID checks, two written references must have been received and checked for authenticity, and enhanced DBS certificates which include barred list information for the majority of staff engaging in regulated activity, all need to have been received. Where an enhanced DBS certificate is required, it must be obtained from the candidate before, or as soon as practicable after the person's appointment. Should there be any delay prior to the individual taking up a position in the School, a risk assessment must be undertaken by the Headmaster and/or DSL, and implemented with great care and caution.

Particular care will be taken with those individuals who supply information via the DBS update service, or who have worked abroad.

By doing this responsibly and thoroughly, it reduces the possibility that low level concerns and/or safeguarding concerns will arise.

8. What staff should do if they have concerns about a child

a) Creating a safe and caring environment:

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 also includes resilience to radicalisation.

With this 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 in which their cultural diversity is respected, encouraging confidence and understanding about how to approach adults if they are in difficulties, believing they will be listened to in an appropriate way.
- 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 SLT, or Governors, as appropriate.
- To create and maintain a system of monitoring those thought to be at risk of harm, and to ensure that we, the School, contribute to assessments of need and support packages for all such 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, and 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 all members of other organisations, if responsible for the School's children at any time, have been subject to appropriate checks and these have confirmed each person's suitability to work with children.
- To develop further a network of support for staff and children, through dedicated pastoral time in school and the application of School pastoral systems such as tutor groups/ Houses etc.

Staff, and particularly boarding staff, should be aware that where faith communities can use ostracism of families as a way of registering disapproval, schools should seek to minimise the impact of this on the children whilst at school through the positive and supportive treatment of that child by the school and their fellow pupils.

d) Creating resilience and supporting Mental Health:

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

Myddelton College can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional well-being, which is tailored to the needs of our pupils. Resilience is promoted within our pastoral programme,

specifically Personal, Health and Social Education, and also within tutor groups and within boarding Houses.

Children will also be supported by ensuring the school both prevents and tackles any bullying or anti-social behaviour which can impact upon a child's mental health and happiness.

Where children or staff identify specific problems or concerns, it will be appropriate to refer the matter both to the appropriate authority within school and also to ensure that the designated safeguarding lead is made aware. Preventing and Tackling Bullying, Mental Health and Behaviour in Schools (DFE, 2017) and Mental Health and Behaviour in Schools guidance (DFE 2018) are available for reference.

e) Teaching children to be aware:

Children are taught about safeguarding through the curriculum, and through PHSE. The age appropriate curriculum teaches children about the risks posed by adults and young people, to include those 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.

School staff act in loco parentis and should therefore 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. Active promotion of fundamental British values is important to and contained within the PHSE programme. This also includes curriculum subjects, extra-curricular activities and, in the furtherance of the School's ethos, through weekly assemblies, multi-denominational services, themed assemblies, child elected School Parliament, Peer Supporters 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.

Discriminatory or extremist opinions or behaviours are challenged as a matter of routine; whilst it is important to ensure challenge occurs, the challenge should be guided and informed, and non-prejudicial.

f) What staff should do if a child is seen as at risk of radicalisation: PREVENT Strategy

Staff should follow the School's normal referral processes by speaking to one of the DSLs immediately when there are concerns about children who may be at risk of being drawn into terrorism.

Children with special educational needs and disabilities are perceived to be more vulnerable to radicalisation.

There may be a referral made to Channel or Children's Social Care depending on the level of risk. Co-ordinated 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 2** 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 SLT and DSLs 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 Policy, with its attachments – to include assessing risk should be consulted for guidance.

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. It is important that staff receive this training to give them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups.

The interaction between the Prevent requirement checks on speakers and KCSIE is likely to mean, in practice, that checks on regular rather than occasional visiting speakers will be recorded on the Single Central Register either as checks on staff or on volunteers.

g) What staff should do if they discover a child may have been subjected to an act of Female Genital Mutilation ('FGM'):

There is a specific legal and mandatory duty on teachers to report to the Police cases where they believe or discover that an act of FGM appears either has or may have been carried out on a girl under the age of 18. This duty does not apply in relation to 'at risk' or 'suspected cases', or in cases where the woman 18 or over. In these cases, teachers and the DSL should follow local safeguarding procedures.

They should still discuss any such case with the DSL and involve Children's Social Care, as appropriate.
(**Appendix 2** of this policy gives information about FGM and procedures to be followed where a child may be at risk; specific reference could also be made to HM Government 'Multi-agency statutory guidance on female genital mutilation' via the DSL.)

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

h) What staff should do if a child goes missing from education:

Should any Child go missing from education, particularly on repeated occasions, this is a vital warning sign and a potential indicator of abuse or neglect, including sexual abuse or criminal and sexual exploitation. The School, and boarding staff in particular, need to be vigilant to a child going missing, and must monitor and report any unauthorised absences immediately (KCSIE Annex B).

There is an Admissions' Register and, twice each day, an attendance register is taken to identify all unauthorised absences from 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 on-going staff training, staff are made aware of the need to be vigilant for signs of unauthorised or even authorised absence from School, to include potential travel to conflict zones, FGM and forced marriage.

For information specific to processes and procedures for dealing with missing children from School, particularly on repeated occasions, please refer to the School's 'Missing Pupil Policy'.

The School recognises its duty to notify the Local Authority when a pupil fails to attend school regularly or is absent without leave for more than 10 days continuously.

The School will notify the Local Authority when a pupil's name is to be deleted from the Admissions' Register.

i) Children leaving school roll - notification to the Local Authority

The School will inform the Local Authority CME Officer
(01824 708169 and ewo@denbighshire.gov.uk) of any child who is going to be added to or deleted from the School's admissions' 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.

If a child has been absent, without the School's permission, for a continuous period of 10 school days or more, or at such intervals as are agreed between the School and the Local Authority, that Local Authority shall be informed.

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.

9. Arrangements for transition of students to another school

a) Where children leave the School:

The DSL will ensure any child protection information, and the file relating to this, are safely transferred both in confidence and as a priority (within five days) to the new School or College; confirmation of receipt of documentation by the accepting School or College will be required.

In addition to the child protection file, the DSL will consider whether it would be appropriate to share any information with the new school or college in advance of a child leaving. This would include, for example, information to allow the new school or college to continue supporting victims of abuse, and have the necessary support in place for when the child arrives.

This will include children who are known to Children's Services, including those children on the Child Protection Register and whether the new School or College are part of the multi– agency plan.

b) New children transferring to Myddelton College:

In preparation for new students arriving at the School, the DSL will contact each child's previous school to arrange for safe transfer and arrival of any/all child protection information and files.

10. Procedures for dealing with Child on Child Harassment allegations

a) Staff are made aware, through training and updates, that children can abuse other children:

Child on Child Abuse, formerly referred to as '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 varying forms of harassment):

- 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 to cause the victim humiliation, distress or alarm; 27
- Sexting (youth produced sexual imagery);
- Initiating/hazing type violence and rituals.

All staff should be aware that safeguarding issues can manifest themselves via child-on-child harassment which is most likely to include but may not be limited to, bullying (including cyber bullying), physical abuse sexual violence and sexual harassment, gender-based violence, up skirting and initiation/hazing type violence and rituals.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention which helps prevent problematic, abusive and/or violent behaviour in the future.

b) Staff and pupils being vigilant and responsive:

Staff and senior pupils must be particularly vigilant to ensure that abusive comments are not dismissed as banter, and that inappropriate behaviour and/or sexual behaviours ignored or underplayed as merely: 'having a laugh'. Such behaviours must be challenged and reported.

Staff and pupils must be aware of the importance of challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

Even though there may be no reported cases of child on child harassment, these behaviours may still be taking place and is simply not being reported. The school community and its individuals must remain vigilant.

Should there be failures as far as young people's behaviour are concerned, children must know that they should report any abuse with confidence, and that they will be supported when doing this.

Equally importantly, they should be made to feel confident they can safely express their views and feelings, and give feedback. Children may not find it easy to tell staff about their abuse. Children can show signs or act in ways that they hope adults will notice and react to. In some cases the victim may not make a direct report.

Staff should remember that a victim reporting a concern or incident may well have experienced such acceptable behaviour on previous occasions. The first disclosure to a trusted adult may only be the first incident reported.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. To this effect, the DSL and pastoral staff will set out for both staff and pupils how the school minimises the risk of child on child abuse; the principal methods used will be through House meetings and PHSE classes, and through the good works of the peer support listeners.

Certain children may face additional barriers to telling someone of abuse because of their vulnerability, disability, sex, ethnicity and or sexual orientation. It is incumbent on all staff, particularly House and sports' staff, that they are aware and vigilant as far as this is concerned.

Abuse which occurs online or outside the school should not be downplayed and should be treated equally seriously.

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

c) Sexual violence and sexual harassment:

This can occur between 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 LGBTQ+ children are at greater risk of such abuse.

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

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment are never acceptable, will never be tolerated and are 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 other children or their peers in this way. (KCSIE Annex B)

Sexual harassment: When referring to sexual harassment, 'Keeping Learners Safe' (Wales 2021) defines harassment as 'unwanted conduct of a sexual nature' that can occur online and offline. (KCSIE Annex B)

When referencing sexual harassment, it is often done 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: 29 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 (the School will consider 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 which 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 those on social media;
- sexual exploitation; coercion and threats;
- up-skirting (as described above) - this is now a criminal offence (KCSIE 49 and Annex B).

d) 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 and will be taken seriously and that they will be supported and kept safe.

Rape, assault by penetration and sexual assaults are crimes. Where there is a report of a rape, assault by penetration or sexual assault, the starting point is it should be passed to the Police.

Where a report has been made to the Police, the school should consult the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator (s) and their parents or carers.

The DSL and SLT will consider confidentiality and anonymity when managing harmful sexual behaviours. Children's Services and other agencies will advise.

Victims 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. This will reflect the fact that assault can result in a range of health, including physical, mental, and sexual health problems and unwanted pregnancy.

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; **30**
- the alleged perpetrator;
- all the other children (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them.

It is important that all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing, dated and signed. This information, in its original form, should be kept safely by the DSL.

Where a pattern of problematic or inappropriate behaviour is identified, the school is responsible for deciding upon an appropriate course of action.

Should it be discovered that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and or the person who has made the allocation is in need of help, or may have been abused by somebody else and this is a cry for help.

If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as detailed in the Behaviour Policy.

e) Contact with Children's Services:

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

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child 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's Services for advice) and **protection of all parties involved**. This may include separation and additional supervision. Victims of child-on-child abuse will be supported by the School in the same way as for all allegations of abuse.

f) Anti-Bullying Policy:

The School also has an Anti-Bullying Policy.

The possibility of child-on-child abuse is minimised by:
- an open atmosphere of mutual trust among the boarding community;
- conscientious and experienced boarding staff;
- good staffing provision and supervision.
- Staff awareness to potential concerns behaviours of the child / remarks / hotspots of vulnerability within the college building and grounds

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's 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.

g) Investigation procedures:

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's 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's Services, parents are informed as soon as possible and that the children involved are supported during the interview by an appropriate adult and, at least, until the investigation is completed.

Confidentiality will be an important consideration for the School and advice will be sought as necessary from Children's Services and/or directly with the Police, as appropriate.

h) Support for alleged victim and perpetrator:

In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk; 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 Visitor, as necessary, and support from external agencies will be sought, as appropriate. School will consider carefully the age and developmental stage of the victim, the nature of the allegations and the potential risks of further abuse.

Where there has been a report of sexual violence, the DSL, or deputy, should make an immediate risk and needs' assessment, and ensure this is implemented.

Children's wishes will be important in deciding how they are to be supported emotionally and socially. A victim should never be made to feel ashamed for making a disclosure or a report.

i) Sexting:

Under British law, it is legal to have sex aged 16 and over. However, 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; for example, 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's Services and/or directly to the Police. This referral will be undertaken by the DSL lead or other safeguarding designated staff.

11. Arrangements for dealing with allegations of abuse against teachers and other staff, to include supply staff, including the Headmaster, Directors, Governors, volunteers and contractors)

a) First stage:

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).

In addition, the DSL will ensure that LCSE arrangements are also followed.

Non-recent allegations should be referred to the LADO in line with the Local Authority's procedures for dealing with non-recent allegations. The LADO will co-ordinate with Children's Social Care and the Police.

b) Following guidance:

The guidance addresses matters where school staff and/or others identified above, 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.

Allegations which appear to meet the reporting criteria in KCSIE will be reported straight away to the LADO. This will be done by the DSL in school, or the duty deputy DSL. The Headmaster will be informed by the DSL who has made the referral that a referral has been made and only those details required to support the referral will be passed on to the Headmaster.

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.

The School's DSL or Headmaster might first contact informally the Local Authority Designated Officer to seek immediate advice. (In borderline cases, discussions with the LADO can often be held informally and without naming the school or individual. On the basis of this advice, discussion may become formal in which case an official, formal referral will take place immediately, giving all pertinent and/or required details.)

c) Investigations following consultation with LADO and/or Police:

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

All allegations which appear to meet any of the above reporting criteria are to be reported straight away to the Headmaster or to a DSL. If an allegation is reported to the DSL, the DSL will keep the Headmaster informed and vice versa.

Where the Headmaster or a DSL is absent, reports may be made directly to the Senior Leadership Team.

d) Where the Headmaster and/or DSL is/are the subject of the allegations or concerns:

Reports must be made to the Directors or the Chair of Governors, without delay. In this instance, the Headmaster / DSL must not be informed of the allegation prior to contact with the Directors or Chair of Governors, and Local Authority Designated Officer (LADO).

Staff may consider discussing any concerns with the DSL, and/or deputies, and make any referral via them. It is a formal responsibility of staff that they should report to the DSL any allegations which appear to be or are a safeguarding concern.

e) Procedures for investigating allegations:

i) Contact with the LADO:

The Headmaster 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 Headmaster 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's Services.

Information on conducting investigations where there are safeguarding concerns or allegations of abuse regarding teachers, including supply staff, and other staff (including the Headmaster, Directors, Governors, volunteers and contractors), can be found in KCSIE 352/353.

ii) The individual against whom the allegation has been made:

Having discussed the allegation with the DSL, and agreed the way forward in light of advice contained within KCSIE (364/5), the Headmaster will ensure that the individual who is the 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's Services or the Police.

The Headmaster will nominate a suitable and acceptable 'named person' to the individual whose role will be to keep the individual informed of the progress of the case; he will also consider what other support is appropriate for the individual via a teacher union, or further teacher support agreed with the individual.

iii) Consideration of suspension:

The Headmaster will 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.

Suspension will not be an automatic response when an allegation is reported (KCSIE 361). The person should be informed at the point of their suspension who the 'named person' is within School and be provided with their contact details.

The Headmaster will give due weight to the views of the LADO and Welsh Government Guidance (above Hyperlink) when making a decision about such matters. The Headmaster, with the DSL's support, will record the rationale and justification for such a course of action, keeping this information safe and ready for referral to appropriate agencies if necessary.

The school has a duty of care to its staff and, whilst the welfare of the child is paramount, the school must offer appropriate welfare support to the adult subject to the investigation, and potentially their family.

If the member of staff lives on site, or is involved in any way with individuals living or working within the school community, then arrangements for alternative accommodation away from children, and perhaps staff attached to the School, should be made during the period of investigation. In addition, a risk assessment will be undertaken by the Headmaster and DSL jointly.

iv) Informing parents:

The Headmaster will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from Children's Services or the Police or where Police and Social Care Services need to be involved. The Headmaster and/or DSL should not inform parents until those agencies have been consulted and have agreed what information can be disclosed

Discussions relating to informing parents or carers should be recorded in writing, giving reasons and any communication with both the individual and the parents of the child or children. Prior to any actions, these must be agreed first with the DSL.

v) Referral to DBS and/or TRA

The Headmaster will discuss with the LADO whether a referral to the Disclosure and Barring Service and/or Teaching Regulation Agency (TRA) should be made; this is done where an allegation is substantiated and the person is dismissed, or where the School ceases to use their services, or the person resigns or otherwise ceases to provide their services.

The School has a legal obligation, and has made a commitment:

* 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

* to report promptly to the Disclosure and Barring Service if there is reason to believe the member of staff has committed one of a number of listed offences, or who have caused harm or pose the risk of harm to a child, or

* to report promptly any person who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

In addition, in the case of a member of teaching staff being so involved, the TRA will also be informed in writing.

Referrals will be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity.

Should an investigation lead 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).

vi) Concluding review:

Prior to the concluding review, the Headmaster should have conducted fortnightly or monthly reviews, depending on the complexity of the case, to ensure that all appropriate actions are being taken and advice followed.

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

In addition, the Headmaster will arrange a case meeting in school to discuss how the School can ensure any lessons are to be learnt.

It is extremely important that when an allegation is made, the School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Where initial discussions lead to no further action, the Headmaster and the DSL should jointly record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious will be removed from the individual's personnel records and destroyed; the individual will be informed of this action formally in writing by the school.

In all other allegations, a clear and comprehensive summary of the allegations, with details of how the allegation was followed up and resolved and a note of any action taken and decisions reached will be composed as a written record written 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.

The school will preserve records containing information regarding allegations of sexual abuse for 10 years or until the accused has reached pension age (whichever is longer). In addition, employer references should be drafted and, prior to signing, checked carefully for accuracy, with appropriate legal reflection if appropriate, and/or checked and/or approved by the LADO and Chair of Governors.

These procedures will also be followed for supply or agency teachers even though the supply agency will have previously been informed by the school of its management of allegations against the supply or agency teacher. Such a responsible action takes due note of the supply agency's policies and their duty to refer to the DBS as the personnel supplier of any causes for concern.

Allegations proven to be false, unsubstantiated or malicious will not be included in employer's references.

If an allegation is shown to be deliberately invented or malicious, the Headmaster will consider whether any disciplinary action is appropriate against a child or other person 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.

12. Staff Code of Conduct (Staff Handbook) matters:

The School's Staff 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.

a. Safer Recruitment:

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, and volunteers are all subject to the necessary statutory child protection checks before starting work.

These checks will include: right to work checks, additional overseas' checks (if necessary), verifying identity, taking up two written references and receiving and checking these before a person if offered employment, 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 or enhanced DBS check certificate will be obtained from the candidate before or as soon as practicable after appointment, confirmation of which will be required before the person starts work. Any variation to this would require a careful and thorough risk assessment with special arrangements approved by the Headmaster. If the applicant has subscribed to the DBS Update Service, 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 all staff, Directors, Governors and volunteers to work with children and young people are 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.

b) Management of Safeguarding:

The School's DSL is Mr Mike Pearson and the four Deputy DSLs are Mr Andrew Allman, Headmaster, Mr Ian Lloyd, Senior Deputy Headmaster, Mr Ian Chan, Head of Boarding, and Mrs Katie Gresley-Jones, Head of Preparatory School. 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 the DSL or duty DDSL, initially by phone or email, in order to discuss safeguarding concerns, should they arise.

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

c) The DSL's responsibilities:

The DSLs' role is to take lead responsibility for safeguarding and child protection matters in the School and boarding arrangements, and pupils' 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.

As a matter of good practice, all those professionals working with children should have regular reviews of their own practice and opportunities to discuss concerns. This should include the personal and professional duty to report welfare and safeguarding concerns to the DSL or, in the absence of action, directly to Local Children's Services.

The DSL works with the Directors and Governors to review the effectiveness of both Policy and practices, and update the School's Safeguarding and Child Protection Policy. This will be done each term and will include, annually, a reflective assessment of the year's work of 'What has happened and been achieved' and 'What lessons have been learned which will give rise to improvements in the school's work to ensure the highest standards of Safeguarding and Child Protection thereafter'.

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 safe 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 or DDSL will respond to and deal with any incident immediately, contacting the Headmaster if and as necessary.

The DSL must be informed, by the leaders of out of hours/out of term activities', of their trip's safeguarding arrangements so that the DSL and deputies have clear information about safeguarding children. The leaders need to know how to contact the duty DSL.

Personal mobile telephone numbers for both DSL and Deputy DSLs 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 are found in Chapter 2 of 'Keeping Learners Safe' (Wales Apr 2021.)

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

d) Training in safeguarding and child protection, to include updates:

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

i) All Staff

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

- the Safeguarding and Child Protection Policy, including information about the identity and role of the DSL;
- the Staff Code of Conduct, including the School's Whistleblowing Policy and procedures, 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 2022);
- School leaders and staff who work directly with children will also be required to read, understand, implement and practise Chapters 1 and 2 of 'Keeping Learners Safe' (WG Guidance 2022) .

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.

As a result of staff's regular formal safeguarding training and in-set, the School will take all reasonable measures to ensure that staff understand both the key information and their responsibilities. Staff supplementary information, to include informal updates, e-bulletins and staff meeting information, are also provided.

All new staff must be provided with induction training which covers key elements set out in KCSIE for Safeguarding. Leaders and all staff who work directly with children must read Annex B KCSIE (2021) as an introduction to their safeguarding responsibilities. All of these documents are provided to all staff during induction.

The school takes a risk based approach to the level of information that is provided to temporary staff and volunteers; however, the DSL will, as appropriate, ensure the School's Staffroom Board has the information readily available for reading and review.

All staff are also required to:

- read, understand, implement and practise Chapters 1 and 2 of 'Keeping Learners Safe' (Welsh Gov.) and confirm in writing 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. The DSL will ensure understanding by staff by delivering appropriate training at INSET or ordinary/extraordinary staff meetings.

- receive, implement and practise 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. The School will endeavour to ensure this online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach within the school.

- undertake regular informal update training, at least annually, to provide them with relevant skills and knowledge to practise effective safeguarding and child protection of children. The School provides these via, for example, emails, staff meetings and training at INSET.

Training will include online safety training.

It will also include Prevent awareness training to equip staff about how to raise concerns appropriately, 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.

ii) Training and updates for DSL and DDSLs

The DSL and DDSLs receive updated Safeguarding and Child Protection training at least every two years to provide them with the current knowledge and skills required to carry out their roles. The DSL and deputies ideally should be trained to the same level to allow effective discussion and debate.

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, promoting a culture of listening to children and training in the approach to Prevent duties.

Where possible, in addition to their formal training, the DSL's knowledge and skills should be updated, for example, via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments, at regular intervals, but at least annually to keep up with any developments relevant to their role.

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 and DDSLs' 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. This will include Prevent awareness training.

In addition, it is effective safeguarding practice that the designated safeguarding lead and deputies have a good understanding of harmful sexual behaviour. The DSL will seek advice about how this can be obtained.

Above all, DSLs should be sufficiently accessible and involved with young people to understand their views.

iii) 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 senior management team of the school, which includes the Headmaster, and the Governors.

The School Senior Leadership Team and Governors will undertake an annual review of the School's safeguarding policies and procedures together with a retrospective 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; such determinations will give rise to immediate discussion and reflective amendment of both policy and practices.

e) The School's arrangements to fulfil other safeguarding responsibilities:
i) Teaching children how to keep safe

The Senior Leadership Team ensures that all children are taught about safeguarding, including online safety, through the curriculum, in PHSE classes and through RSE education. Children are taught through informed discussion about staying safe in school and also beyond it.

School and its staff must recognise that the 'one-size-fits-all' approach may not be appropriate for all children and more personalised or contextualised approaches for vulnerable children, victims of abuse and some SEND children might be needed.

This teaching and learning help children to adjust their behaviours in order to reduce risks and build resilience, including how to recognise and challenge radicalisation, and how to use electronic equipment and the Internet safely, to include when they are online at home.
When teaching children about the safe use of electronic equipment and the internet, 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, are detailed.

Internet safety is an integral part of the School's Computer Science curriculum and is 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;
- to 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. The school ensures that appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate material online, but without an unreasonable level of blocking;
- to ensure children are safe from terrorist and extremist material when accessing the Internet in school, including by establishing appropriate levels of filtering.

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.

ii) 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.

Mr Mike Pearson 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

iii) Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable, detailed in:
- the Prevent Policy,
- the School's Visitors Policy & Procedures (School Day & Extra-Curricular),
- the Visitor Policy & Procedures (Boarding).

The School's responsibility to children is to ensure that they learn and are able to assess critically 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, whether invited by staff or by children themselves, 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 will 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.

1v) 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.

v) 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.

vi) Equal Opportunities

In meeting its safeguarding obligations, the School will be mindful of the obligations under the Equality Act 2010, which cover 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, Directors and Governors 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.

vii) The use of 'reasonable force' in School

All Staff are required to undertake training in the 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, anyperson (including the self- harm to the learner);
- prejudicing the maintenance of good order and discipline at the school or among any leaners 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 who 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 - Handling

Should any adult consider the use of reasonable force is both necessary and appropriate to safeguard a pupil of Myddelton College, it is essential that the adult should be aware that:

- all alternative and other strategies for avoiding and controlling a situation have been tried or used, and been unsuccessful,
- the reasonable force used should be proportional to the need,

- the pupil should be told as soon as reasonably possible why the action has been taken,
- the adult who has used the force should, at the earliest opportunity, pass responsibility for the pupil to another member of staff, and stand back from the situation,
- the use of reasonable force should be reported in writing to the Headmaster with all appropriate details, witness statements, times and dates, and signatures, at the earliest opportunity.

13. APPENDICES

APPENDIX 1 – KEY EXTERNAL CONTACTS (CONTINUED) / POLICY GUIDANCE & ADVICE

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
    Weston House, 42 Curtain Road, London EC2A 3NH

The following telephone numbers are for reporting concerns regarding antiterrorism:

    Channel contacts (see Appendix 2 for details regarding 'Channel' and the 'Prevent' Strategy):

    North Wales Police: 0300 3300101

    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

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

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

Policy has regard to the following guidance and advice:

- 'Keeping Learners Safe' (Welsh Gov.) – Statutory Guidance for Schools and Colleges (2022)
- Keeping Children Safe in Education (KCSIE) 2022
- 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: CONTEST Strategy 4P's: Prevent, Pursue, Protect, Prepare, 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:
- Child on Child Abuse
- Prevent
- PHSE
- Equal Opportunities

- Whistleblowing
- Low Level Concerns **47**
- Staff Code of Conduct
- Anti-Bullying
- Anti-Racism
- Behaviour
- Social Media
- Missing Children.
- Complaints
- ICT Acceptable Use
- Application and Recruitment
- Attendance and Registration
- Boarding Visitors
- Photographs and Digital Images
- Data Protection
- Restraint
- School Visitors
- Site Security

APPENDIX 2 – INDICATORS OF ABUSE AND NEGLECT

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

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. 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 cyber-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.

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.

2. Specific Safeguarding Issues:

- Behaviours linked to drug taking, alcohol abuse, truanting 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.

3. Contextual Safeguarding:

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the School. 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 means assessments of children must 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.

4. Child Exploitation:

This 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, for example, 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.

5.   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-andas sessment-forms

6. 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-an dvulnerable-adults-county-lines

7. FGM:

This 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

8. 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 are 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 is 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 fmu@fco.gov.uk.

9. 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.

10. 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 disproportionally 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 – member of SLT 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 Government) – 'Keeping Learners Safe' (Welsh Gov) 2015 – Department for Education statutory guidance.

LGBTQ+ – The acronym for lesbian, gay, bisexual, transgender, queer & questioning

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 – 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 – KEY DOCUMENTS

Keeping Learners Safe – Guidance April 2022 (Welsh Government).

Keeping Learners Safe - School Audit Tool

WG Safeguarding
audit tool for school

This document can be also accessed from the Welsh Government's Website:
https://gov.wales