



Myddelton College

Safeguarding & Child Protection Policy

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1. KEY EXTERNAL CONTACT DETAILS IN DENBIGHSHIRE AND NORTH WALES

A. Local Authority Designated Officer (LADO):

Local Authority	Region	Name	Email	Landline
Mobile				
Denbighshire Wales LADO Referrals			cfsgateway@denbighshire.gov.uk	01824 712200
Denbighshire Wales Cindy Thomson 07876 577538			cindy.thomson@denbighshire.gov.uk	01824 712829

B. **Denbighshire County Council** is responsible for safeguarding and child protection in the Denbighshire area. They provide essential services to the local community and can be contacted at 01824 706000.

If you are concerned about the welfare or safety of a child or young person, please contact:

01824 712200: Monday to Thursday, 9am to 5pm and Friday 9am to 4.30pm

0345 053 3116: evenings and weekends

You can also send an email to cfsgateway@denbighshire.gov.uk. Safeguarding children | Denbighshire County Council

C. **North Wales Safeguarding Children's Board (NWSCB)** is a statutory body which co-ordinates, monitors and

challenges its partner agencies in safeguarding children in North Wales.

The objectives of the NWSCB are:

- to PROTECT children in its area who are experiencing or at risk of abuse, neglect or other kinds of harm and
- to PREVENT children who within its area who are experiencing or at risk of experiencing abuse, neglect or other kind of harm.

Safeguarding Boards have a unique role to play. North Wales Safeguarding Children's Board sees its function as to make "Safeguarding everybody's business".

The partner agencies are all six local authorities across the region (Cyngor Gwynedd, Anglesey County Council, Conwy County Borough Council, Denbighshire Council, Flintshire Council and Wrexham County Borough Council), North Wales Police, Betsi Cadwaladr University Health Board, National Probation Service and Community Rehabilitation Company.

regionalsafeguarding@denbighshire.gov.uk

Tel: 01824 712903

D. NSPCC Whistleblowing Advice Line

ADDRESS: Weston House, 42 Curtain Road, London, EC2A 3NH

TEL: 0800 028 0285

EMAIL: help@nspcc.org.uk

NSPCC Report Abuse in Education Advice Line

TEL: 0800 136 663

EMAIL: help@nspcc.org.uk

E. Disclosure and Barring Service

ADDRESS: DBS customer services, PO Box 3961

Royal Wootton Bassett, SN4 4HF

TEL: 03000 200 190

EMAIL: customerservices@dbs.gov.uk

F. Teaching Regulation Agency ADDRESS: Teacher Misconduct

Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry CV1 2WT

TEL: 0207 593 5393

EMAIL: misconduct.teacher@education.gov.uk

G. ESTYN

Anchor Court, Keen Road,

Cardiff, CF24 5JW

Telephone: 029 2044 6446

Safeguarding Officer: 029 2044 6482 / 02920 446484 (24 hrs)

Office: 02920 446446 (office hours only)

Email: safeguarding@sharepoint.estyn.gov.uk

G. Care Inspectorate Wales

Telephone: 0300 7900 126 Email: ciw@gov.wales

Welsh Government Office, Sarn Mynach, Llandudno Junction, LL31 9RZ

2. KEY SCHOOL CONTACT DETAILS

Designated Safeguarding Person ("DSP"), Prevent Lead and Designated Teacher for Looked After Children

Mr Michael Pearson
TEL: 01745 472201

EMAIL: m.pearson@myddeltoncollege.co.uk

Deputy Designated Safeguarding People ("DDSPs")

Mrs Lucy Davies
TEL: 07776147295

EMAIL: l.davies@myddeltoncollege.co.uk

Mrs Katie Gresley-Jones
TEL: 01745 472201

EMAIL: k.gresley-jones@myddeltoncollege.co.uk

Mr Alun Brown
TEL: 01745 472201

EMAIL: a.brown@myddeltoncollege.co.uk

Mr Tom Eddy
TEL: 01745 472201

EMAIL: t.eddy@myddeltoncollege.co.uk

3. POLICY STATEMENT

Introduction:

This is a Myddelton College whole-School policy; this includes the Senior School, Preparatory School and the boarding Houses. The policy is reviewed and updated annually (or early in response to changes in legislation) by the SLT and Advisory Committee and is available on the website.

Myddelton College fully recognises the contribution it can make to protect children from harm and to support and promote the welfare of all children who are pupils at Myddelton. This policy applies to all our stakeholders - pupils, staff, parents, advisories, volunteers, placement students and visitors. It has been written and updated to include key advice contained in Keeping Learners Safe (Wales), 2022.

Myddelton College is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. We recognise that no single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The policy is updated annually in accordance with 'Keeping Learners Safe' (Wales), Welsh Government Guidance for Schools and Colleges including Independent Schools (Wales): April 2023 last updated) and Wales Safeguarding Guidance 2024 and North Wales Safeguarding Procedures 2020.

Updating the policy annually is the responsibility of the DSP, as is the regular review of the procedures and implementation of the policy. These reviews will be undertaken with the Headteacher and the Advisory Committee; they will have the opportunity to ask appropriate questions and seek elaboration of review conclusions.

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.

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 Advisory Committee of the College.

Compliance

Myddelton College has a statutory duty under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children. Under this duty, the School follows the guidance set out in:

- Keeping Learners Safe 265/2020 (the role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002);
- Safeguarding Children: Working Together Under the Children Act 2004;
- The Independent Schools Standards (Wales) Regulations 2024, as amended from time to time.

The procedures within this document take into account the Wales Safeguarding Procedures 2022, and give due regard to the statutory documents linked to all aspects of safeguarding within Wales and England.

Guidance Wales (current links are given at the end of this document)

- Welsh Office circular 265/2020 Keeping Learners Safe (which supplements the guidance in Safeguarding Children):
 - Working Together Under the Children Act 2004);
 - the Independent Schools Standards Regulations (Wales, 2003), Standard 3;
 - Welsh Government Circular No: 009/2014 Safeguarding Children in Education – Handling allegations of Abuse against teachers and other staff;
 - the Counter-Terrorism and Security Act (2015 – Section 26, The Prevent Duty);
 - the Social Services & Wellbeing Act, Wales (2014);
 - Working together to Safeguard People Disqualification under the Childcare Act (2006 - Guidance published 2015); the Serious Crime Act (2015);
 - the Female Genital Mutilation Act (2003, amended by SCA 2015);
 - other requirements followed by the Welsh Government in its commitment to safeguard children and young people are those of:
 - the Education Act (2002) s175/175;
 - the Children Act (1989, as amended 2004, section 52);
 - the United Nations Convention on the Rights of the Child (UNCRC) 1989, articles 12, 19, 28 and 29;
 - the Equality Act (2010);
 - the Rights of Children & Young Persons Measure, Wales (2011).
- Relationships education, relationships, and sexuality education (RSE) and health education (September 2021).
- Behaviour in schools (September 2022)
- Working together to improve school attendance (May 2022)
- Keeping children safe in out of school settings (April 2022)
- Digital and technology standards in schools and colleges (March 2023)
- Safeguarding and protecting people for charities and trustees (June 2022)

Additional reference material – England

- Keeping Children Safe in Education - DfE Statutory Guidance, (England - revised September 2021), especially Annex A;
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education (Safer Recruitment Consortium September 2015);
- Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018, HM Government.

This policy also takes into account the procedures and practice of Denbighshire County Council as part of the multi-agency safeguarding arrangements set up by the Children's Safeguarding Assurance Partnership (CSAP) for Denbighshire.

Staff:

In this, 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.

Boarding responsibilities and arrangements

The Welsh Government has published guidance on the National Minimum Standards (NMS) for Residential Special Schools and the National Minimum Standards for Mainstream Boarding Schools to be met as part of independent schools' initial and continued registration. As with other independent schools, the Independent Schools Standards (Wales) Regulations 2003 set out standards to safeguard and promote the welfare of children for whom accommodation is provided by a boarding school. These standards are used to assess whether the school is complying with its legal obligation to safeguard and promote the well-being of the children for whom accommodation is provided.

SCHOOL WEBSITE POLICIES REFERRED TO IN THE SAFEGUARDING AND CHILD PROTECTION POLICY

- WHISTLEBLOWING POLICY
- ANTI-BULLYING POLICY
- MISSING PUPIL POLICY & PROCEDURES
- SAFER RECRUITMENT POLICY
- EQUALITY, DIVERSITY, INCLUSION AND ANTI-RACISM POLICY
- ACCESSIBILITY POLICY
- BEHAVIOUR POLICY
- CHILD ON CHILD ABUSE POLICY
- LOW LEVEL CONCERNs POLICY
- ONLINE AND E SAFETY POLICY
- PREVENT EXTREMISM AND RADICALISM POLICY
- INDEPENDENT PERSON OR LISTENER POLICY
- ATTENDANCE AND REGISTRATION POLICY
- EDUCATIONAL GUARDIANSHIP POLICY
- HEALTH & SAFETY POLICY

Roles and responsibilities

3.1 **All Staff:** Safeguarding and child protection is everyone's responsibility. At all times, staff should consider what is in the best interest of the child. All staff (including advisory Committee, supply staff,

contractors and volunteers) are under a general legal duty to:

- contribute to providing a safe environment in which students can learn;
- consider at all times the best interests of the student and take action to enable all students to have the best outcomes;
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSP;
- be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues;
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the school's policies pertaining to safeguarding and child protection procedures and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSP or, where appropriate, to one of the key contacts in accordance with this policy;
- support social services and any other agencies following any referral.

3.2 The Designated Safeguarding Person (DSP) Myddelton College has appointed a Designated Safeguarding Person (DSP) who is a senior member of staff and member of the leadership team. The DSP takes lead responsibility for safeguarding (including on-line safety) and child protection and is the first point of contact for parents, students, staff and others if they have any concerns about safeguarding or child protection. The school also has Deputy Designated Safeguarding Persons (DDSPs), ensuring that there is always an appropriately trained and designated person in the school at all time.

DSP responsibilities include:

- **Report making and managing:** the DSP will manage the report of cases of suspected abuse, neglect, radicalisation or any other relevant issue to the Local Authority Social Care Service, Channel programme, DBS and/or Police as appropriate.
- **Working with others:** the DSP will be the principal point of contact for all staff and when coordinating different departments and functions within and outside the school in the management of a case. They will promote supportive relationships with parents and carers to safeguard students' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- **Information sharing and managing the child protection file:** the DSP is responsible for keeping child protection files up to date with accurate and complete records of any actions or decisions taken and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school promptly. This will take place within 5 days of the student starting at a new setting.
- **Raising Awareness:** the DSP is responsible for reviewing and updating the school's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and for ensuring that parents can access the policy and know that the school may make referrals where abuse or neglect is suspected.
- **Training, knowledge and skills:** the DSP will receive the appropriate level of training, together with regular updates, to ensure they are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school or home and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- **Providing support to staff:** the DSP should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support. The DSP will continue to provide staff with the relevant skills and knowledge to safeguard children effectively.
- **Understanding the views of children:** the DSP should, through training, develop the

knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.

Note: A full description of the responsibilities of the DSP is set out in the Appendix of this policy.

3.3 Deputy Designated Safeguarding Persons (DDSP) DDSPs are trained to the same standard as the DSP and, in the absence of the DSP, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of a long-term absence of the DSP, a Deputy will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSP but final lead responsibility for safeguarding and child protection remains with the DSP.

3.4 Headteacher The Headteacher is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end the Headteacher will ensure that:

- the safeguarding and child protection policy and procedures adopted by the advisory Committee are implemented and followed by all staff;
- sufficient time, training, funding, support and resources necessary to enable the DSP and DDSPs to carry out their roles effectively are allocated, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- matters which affect student welfare are adequately risk-assessed by appropriately-trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems which operate with the best interests of the student at heart are in place for students to express their views and give feedback;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's Whistleblowing Policy and low-level concerns procedures;
- ensure all staff are knowledgeable and confident in their safeguarding practice; including making sure that their practice is in line with national and local requirements;
- students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- safer recruitment procedures are being adhered to in line with safeguarding regulations
- s/he acts as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff and volunteers) and liaises with the Local Authority Designated Officer (LADO);
- She notifies the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority and/or the Police of anyone who has harmed or may pose a risk to a child.

3.5 The Directors The Directors have overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of students. It is the role of the Directors to provide scrutiny of the safeguarding policy and safeguarding practice. The Directors take seriously their responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end, the Director overseeing safeguarding protocols will ensure that:

- they are trained in safeguarding at the point of their induction
- an effective, up-to-date child protection policy is in place and made available on the school's website;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- an appropriate member of staff from the school's leadership team is appointed to the role of DSP;
- all staff receive safeguarding induction and ongoing training in accordance with this policy;
- students are taught about safeguarding, including online safety;
- the school's safeguarding arrangements take into account the procedures and practice of the Local Safeguarding Children Partnership;

- Myddelton College contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of students are identified;
- clear systems and processes are in place for identifying and managing students with mental health problems;
- child protection files are maintained and, where appropriate, such records are transferred to a student's new school in accordance with statutory guidance;
- appropriate filters and monitoring systems are in place to keep children safe online; the school reports to their local authority any student who joins or leaves the school at non-standard transition times in line with statutory and local authority guidance;
- ensures written assurances are provided by individuals or organisations who hire school premises confirming appropriate safeguarding and child protection procedures are in place.
- all school leaders understand the importance of Human rights and equality legislation.
- ensure that, according to the Equality Act 2010, Myddelton College must not unlawfully discriminate against students because of their sexuality, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions.

3.6 Safeguarding Advisor: The Advisory Committee representative takes lead responsibility for monitoring the operation of safeguarding arrangements in the school. This is done in a number of ways, these being:

- discussions about safeguarding matters with the DSP at least once a term and more regularly, if needed;
- ensuring an annual audit of the school's safeguarding procedures is submitted to the Advisory Committee with recommendations for further improvements. The annual written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the school is making to inter-agency working; and the provision for teaching students how to keep themselves safe. This audit will form part of the annual review undertaken by the College as a whole to ensure that all policies, procedures and training provided by the college are effective and comply with the law.

4. EQUALITY ACT 2010

Myddelton College understands and recognises its obligations under the Equality Act and that the school must not discriminate against pupils because of a protected characteristic including sexuality, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the school will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The school will also consider its duty to make reasonable adjustments for disabled pupils.

5. CONCERN ABOUT A CHILD

The School has a duty to consider, at all times, the best interests of the pupil and take actions to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children are everyone's responsibility. The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the school, and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact Estyn directly if they wish.

The School has arrangements for listening to children and providing early help. All children have a pastoral support network and a large number of adults from whom they can seek advice or talk to. All students have a form tutor and a Head of Year in addition to their classroom teachers. In addition to this, boarding students have a Head of Boarding, a Houseparent and an assistant Houseparent. Beyond this, children are made aware of the First Aid team's availability by posters around the school. The safeguarding team of DSP and DDSPs is introduced during assemblies and notices about the team can be found in boarding houses, teaching areas and social areas.

Independent Listener:

For external support, the School appoints a local Independent Person, Mrs Jo Davies, who is introduced to the children in assemblies and posters are displayed in boarding houses with contact details. "Who can help" posters are also displayed in boarding houses and social areas detailing contacts. Details of key pastoral staff and also contact details of external organisations such as Childline, Young Minds and the Samaritans. The School also assigns sixth form students as peer mentors to younger children who are identified as needing low level support.

Definitions of safeguarding and types and signs of abuse.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

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 a school or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

6. PROCEDURES FOR DEALING WITH CONCERNs ABOUT A CHILD

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below.

Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, Information Sharing:

Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. The Advisories recognise the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with Local Authority Children's Social Care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears

regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR") must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Person ("DSP") or a Deputy (DDSP).

The Headteacher will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data',
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk,
- not providing pupils' personal data where the serious harm test is met.

All staff should:

- listen carefully,
- avoid asking leading questions,
- reassure the individual that the allegation/complaint will be taken seriously and they will be supported and kept safe,
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report,
- 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,
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSPs if they have concerns,
- determine how best to build trusted relationships with children and young people which facilitate communication.

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Keeping Learners Safe (Welsh Government).

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being a DSP or a DDSP).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is

particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place that are well promoted, easily understood and easily accessible for children to report confidently abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the pupil/s at their heart.

Contextual Safeguarding:

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially a DSP and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early Help

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association
 - with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health
 - problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is absent from education, particularly on repeat occasions and/or prolonged periods including persistent absences for part of the school day.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSP. The DSP will consider the appropriate action to take in accordance with safeguarding partners.

Denbighshire's threshold guidance and determine the level of need. The DSP will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early

help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Early Help Assessment – information for professionals – Denbighshire County Council

What staff should do if they have concerns about a child:

If staff (including advisories, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSP to agree a course of action, although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than the DSP makes a referral, they should inform the DSP as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSP should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSP and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a child is in danger or at risk of harm

If staff (including advisory Committee, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate report to children's social care and/or the police. Anyone can make a report. Any such report must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk.

Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSP makes a report, they should inform the DSP as soon as possible that a report has been made. The local authority social worker should acknowledge receipt to the reporter within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSP and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Where children are engaged in close one-to-one teaching such as during music lessons, individual sports coaching sessions or during individual tutoring the additional procedures should be followed:

- use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson / meeting is taking place, inviting them to visit periodically;
- arrange the meeting during normal school hours when there are plenty of other people about;
- do not continue the meeting for any longer than is necessary to achieve its purpose;
- avoid sitting or standing in close proximity to the pupil, except as necessary to check work;
- avoid using "engaged" or equivalent signs on doors or windows;
- avoid unnecessary physical contact;
- avoid any conduct that could be taken as a sexual advance;
- refer any incident that causes you concern immediately to a DSP or DDSP;
- report any situation where a pupil becomes distressed or angry to a DSP or DDSP.

What staff should do if a child is seen as at risk of radicalisation

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as the Prevent Duty, forming part of the School's wider safeguarding obligations.

Staff should follow the School's normal referral processes when there are concerns about children who may be susceptible to extremist ideology and radicalisation. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or 0800 789 321. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Headteacher, DSP and advisory Committee Safeguarding representative responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised. The School's procedures for carrying out the Prevent duty are outlined in the Prevent Extremism and Radicalism Policy.

What staff should do if they discover an act of Female Genital Mutilation ("FGM")

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSP and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries. If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSP to agree a course of action, although staff can make a direct referral to children's social care.

How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and report any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns. For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's Air Drop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSP as soon as possible. The DSP will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keeping them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSP must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared and need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Headteacher. Records will be kept in line with statutory requirements set out in Keeping Learners Safe (Welsh Government), and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSP immediately, who should always inform the police as a matter of urgency.

What staff should do if a child is absent from education

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. The School's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education can be found in the School's Missing Pupil Policy and Procedures.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The School will report to Denbighshire County Council a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more. When working with Local Authority children's services where school absence indicates safeguarding concerns the School will have regard to the non-statutory DfE guidance 'Working together to improve school attendance'.

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and

mental health.

Local Authorities should share the fact a child has a social worker, and the DSP should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. As first lines of provision, the School provides excellent pastoral support through classroom teachers, form tutors, **Heads of Section, Headteacher, Deputies** and the Safeguarding Team, some of whom are trained as mental health first aiders.

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. Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. Public Health Wales has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Headteacher. Where there are concerns about the Headteacher, this should be referred to the Chair of the Advisory Committee. In the event of allegations of abuse being made against the Headteacher, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the LADO at Denbighshire County Council. Any safeguarding concern can also be reported to a safeguarding advisory if necessary.

What staff should do if they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's Whistleblowing Policy and procedures. 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.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

7. ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships

between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, up-skirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside school should not be downplayed and should be treated equally seriously.

The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children. The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children through the Learning Development Department. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sexuality, ethnicity and/or sexual orientation.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child on child abuse. Issues in boarding accommodation are responded to immediately and concerns reported directly to the DSP and Headteacher of Boarding. The School will

comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

The School minimises the risk of child on child abuse through:

- educating all members of the advisory Committee, its senior leadership team, staff, students, and parents about this issue;
- engaging parents on these issues;
- supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs. These interventions can be 'de-clinicalised' and brokered through a positive relationship with the School and its staff;
- working with governors, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;
- creating conditions in which children can aspire to, and realise, safe and healthy relationships fostering a positive whole-school culture where there is zero tolerance of any form of abuse;
- ensuring that all child-on-child abuse issues are fed back to our safeguarding team so they can spot and address any concerning trends and identify students who maybe in need of additional support.

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

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

The School will take advice from the CSAP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s).

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the CSAP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed.

Confidentiality will be an important consideration for the School and advice will be sought as necessary from the CSAP and/ or the police as appropriate. The School will have regard to the procedures set out in Keeping Learners Safe (Welsh Government) at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from a DSP or DDSP who should consider:

parents or carers should normally be informed unless doing so would put the victim at greater risk;
the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care;
and whether a crime has been committed.

Ultimately, the DSP or DDSP will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. When a report has been made to the police, the School will 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. If the DSP decides to make a referral to children's social care

and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSP may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the CSAP referral process.

The School's approach to sexting is primarily education through the Relationships and Sexuality Education Curriculum. Children and young people are provided with education about:

- what it is;
- how it is most likely to be encountered;
- the consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment;
- issues of legality;
- the risk of damage to peoples' feelings and reputation;
- strategies and skills required to manage specific requests or pressure to provide such images and managing the receipt of such images – who to tell, what to say, what to do, what not to do and where to get support from.

Nudes and semi-nudes can be shared by, and between, children and young people under a wide range of circumstances, and are often not sexually or criminally motivated. Any incident involving nudes and semi-nudes is treated as a safeguarding concern and should be reported to a DSP or DDSP. The School's response to such an incident will differ depending on the motivations behind the incident and the appropriateness of the child or young person's/people's behaviour. Therefore, engaging in the taking or sharing of nudes and semi-nudes may not always be 'harmful' to all children and young people. Situations are considered on a case by case context, considering what is known about the children and young people involved and if there is an immediate risk of harm. The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child on child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by a member of the safeguarding team within school and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSP will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSP (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.

The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSP will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), School transport and Boarding Houses if necessary.

The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra-familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSP will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Headteacher will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

8. DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and CSAP arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police.

Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

When dealing with an allegation about a staff member, the School will apply common sense and judgement, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

Allegations which appear to meet the above reporting criteria are to be reported straight away to the "case manager" who is the Headteacher or DSP:

A. If an allegation is reported to the DSP, the DSP will keep the Headteacher informed. Where the DSP and Headteacher are absent or are the subject of the allegation, reports should be made to the Chair of Advisories. Where the Headteacher or DSP are the subject of the allegation, they must not be informed of the allegation prior to contact with the Chair of the Advisory body and LADO.

B. The case manager should 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 case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate 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. 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 social care. The DSP is responsible for ensuring the child is not at risk.

C. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

D. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

E. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

- redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the School so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, WT, Keeping Learners Safe (Welsh Government) and KCSIE when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

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

G. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation

should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

H. The case manager 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 social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

I. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

J. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

K. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services.

The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

L. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should 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 or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with Keeping Learners Safe (Welsh Government) and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it's necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSP should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Headteacher will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

9. ADDITIONAL CONSIDERATIONS WHEN DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies. Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

10. DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, service providers that run extra-curricular activities or holiday letting groups). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSP or DDSPs and how they can be contacted.

11. DEALING WITH CONCERNs OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff. The School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's staff code of conduct provides clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times. The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns Policy. Low level concerns should be reported via the SAFEGUARDING: LOW LEVEL CONCERNs form. The Headteacher is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Headteacher without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Headteacher, it should be referred to the Chair of the Advisory Committee. Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Headteacher will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for the same duration as that individual's personnel file.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harm threshold, it will then follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified. If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Headteacher will consult with the LADO and take a more collaborative decision-making approach.

12. SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

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, are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service. All members of the Advisory Committee are subject to safer recruitment procedures and DBS checks.

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

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Visiting Speakers Policy.

The School's procedures for managing contractors attending the School site can be found in the School's Visitors Policy.

13. STAFF TRAINING

Induction and training are in line with advice from the CSAP.

All Staff

All new staff who work directly with children, whether full-time, temporary or volunteers, will be provided with induction training that includes:

- the child protection and safeguarding policy (including the policy and procedures to deal with child on child abuse);
- the role and identity of the DSPs and any DDSPs;
- the behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media;
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education;
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- reading a copy of Keeping Learners Safe

All staff are directed to the location of the above documents during induction. All teaching staff, as part of their appraisal, are asked to identify how they are going to further promote their knowledge and understanding of safeguarding.

Staff who do not work directly with children are provided with induction that includes hardcopies of the following documents:

- the child protection and safeguarding policy (including the policy and procedures to deal with child on child abuse);
- the role and identity of the DSPs and any DDSPs;
- the behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media;
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- a copy of Keeping Learners Safe

All staff

All staff must be continually updated with:

- Keeping Learners Safe. Staff will be updated on any changes via INSET safeguarding training;
- Receive training in safeguarding and child protection regularly, in line with advice from the CSAP.

Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will

also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.

- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, staff meetings, emails, staff bulletins.

The nominated safeguarding Advisor is appropriately trained and will ensure that all advisories receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The advisories are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements.

Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

DSP

The DSP receives updated child protection training at least every two years to provide him with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children, training in the CSAP approach to Prevent duties and harmful sexual behaviours. The DSP's knowledge and skills should be updated at least annually to keep up with any developments relevant to the role. In particular, the School will support the DSP in developing knowledge and skills to understand the views of children, including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSPs are trained to the same level as the DSP.

All senior monitors are trained in safeguarding and all pupils are made aware of safeguarding procedures and where they can seek advice.

14. THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The Advisory Committee ensure that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside School, in order to reduce risks and build resilience, including radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's PSHE and Relationships and Sexuality Education ("RSE").

The School maintains effective communication with parents and guardians on how the School will educate their children on keeping safe and also how they can support their children at home to keep safe, particularly online. This is done through presentations to parents on safeguarding issues,

presentations to parents on the PSHE and RSE programmes and access to the content of the lessons their children will be taught, regular updates of current issues via the School newsletter and also a dedicated Safeguarding and Wellbeing page on the website.

Filtering and monitoring

The school's internet access is protected by a firewall that restricts access to inappropriate or harmful content. The School's IT department monitors the use of the School's WIFI and liaises with the DSPs where concerns arise outside of the normal weekly report. The School uses Watchguard for their Firewall and Internet Filter Configuration. Further details of this can be located in the IT office. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scam (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's Pupils use of Online and E-Safety Policy and the Photographs and Digital Images Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

Relationships and Sexuality Education (“RSE”)

RSE is compulsory from September 2020 although the School has flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment.

The School will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sexuality Education (RSE) and Health Education when making arrangements for and teaching RSE. RSE will form part of the School's PSHE programme.

Looked After Children

The advisory committee 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. The DSP is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values. The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the visiting Speaker's presentation and/or footage in advance of the session being provided. Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Arrangements for use of school premises for non-school activities

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSP or DDSPs can be contacted and/or are available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance 'Keeping children safe in out-of-school settings' (April 2022). The lettings manager will complete and keep a record of the handover documents for external lettings of the school premises.

This includes:

- Issuing the letting organisation with the School's child protection and safeguarding policy.

- Arrangements for contacting the DSP or DDSP.
- If applicable, will view and keep a copy of the letting organisation's safeguarding policy and nominated DSP for the duration of their stay.
- Confirmation at the end of their stay whether there have been any child protection or safeguarding incidents to report, and arrangements for reporting if information should come to light after the duration of their residency on the School's campus.

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSP or DDSPs.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSP and DDSPs, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

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

Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSPs or DDSPs.

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 (including through corporal punishment). 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 sexuality) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sexuality (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or up-skirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sexuality, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sexuality. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual

behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's Air Drop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or maybe referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share the claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" sets out the classification of incidents, and how each should be handled.

Up-skirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sexuality can be a victim.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve 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.

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime 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 and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and up-skirting.

Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); 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; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sexuality) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited (e.g. they believe they are in a genuine romantic relationship).

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. The CCE indicators below can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "Child sexual exploitation: guide for practitioners". CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b)

for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves maybe experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- 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.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse. Children who have been exploited will need additional support to help maintain them in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of "deal line".

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims (May 2022)".

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSPs (or a deputies), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre – NCSC.gov.uk.

Mental health: all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

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

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSP or DDSPs. The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

So called 'honour based' abuse: 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

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

indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil 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 pupil's return.
- A pupil is reluctant to undergo a medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSP or DDSPs who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers personally to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSPs and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSPs in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack, particularly section 13.1

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.²⁴⁸ 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. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. 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.

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. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing apolitical, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). 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 susceptible and act proportionately, which may include making a Prevent referral. Designated Safeguarding Persons and other senior leaders in colleges should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSPs or the DDSPs, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSPs should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions:

Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

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

Lesbian, gay, bi or trans ("LGBT"):

The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The School endeavours to provide a safe space for LGBT children to speak out or share their concerns with trusted members of staff.

Domestic abuse:

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021.

The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

The School recognises the serious, long lasting emotional impact of domestic abuse on children. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

The School has commitment to Operation Encompass and informing all stakeholders of the initiative. The lead person for Operation Encompass is Mr Pearson. School staff may also contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil maybe at risk of homelessness they should talk to the DSP in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and/or missing can be found in the School's Missing Pupil Policy. All unexplained absences will be followed up in accordance with this Missing Pupil Policy.

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

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, 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 pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority. These intervals are discussed with the local authority and agreed on a case-by-case basis. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports

identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents:

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system:

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison:

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

DESIGNATED SAFEGUARDING PERSON JOB DESCRIPTION

The Designated Safeguarding Person (DSP) must be an appropriate senior member of staff, from the school or college leadership team. They have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies. The Designated Safeguarding Person need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post. Whilst deputies can carry out delegated activities, the ultimate lead responsibility remains with the Designated Safeguarding Person. The lead responsibility cannot be delegated.

Deputy designated safeguarding persons

The deputies are trained to the same standard as the designated safeguarding Person and the role should be explicit in their job description. Whilst the activities of the designated safeguarding person can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSP, this lead responsibility should not be delegated.

Availability During term time

The designated safeguarding person (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the Designated Safeguarding Person (or deputy) would be expected to be available in person, Myddelton College will in exceptional circumstances allow availability via phone and or Skype or other such media is acceptable. The designated safeguarding person must arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage reports

The designated safeguarding person is expected to report cases

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

Working with others

The designated safeguarding person is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the Headteacher to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding

- whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
- ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding person is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice. When children leave the school (including in year transfers) the DSP should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as Designated Safeguarding Persons and special educational needs co-ordinators (SENCO's) or the named person with oversight for SEND in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the Designated Safeguarding Person should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The DSP should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the advisory Committee or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and

- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The designated safeguarding person (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Person (and any deputies) should undertake Prevent awareness training. Training should provide the DSP with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

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

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Persons, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the Designated Safeguarding Person in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

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

Understanding the views of children

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

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

Holding and sharing information

The designated safeguarding person should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

Myddelton College affirms that this policy fully complies with Welsh Government statutory guidance, including *Keeping Learners Safe* (2022), Wales Safeguarding Procedures (2020), and the Independent School Standards (Wales) Regulations 2024. It also meets the Boarding Schools' Association (BSA) expectations and the National Minimum Standards for Boarding Schools, ensuring robust safeguarding arrangements in residential settings. The College guarantees that:

- All boarding provision adheres to CIW and Estyn inspection requirements, including safe recruitment, staff training, and welfare monitoring.
- A Designated Safeguarding Person (DSP) or Deputy is available at all times, including out-of-hours and during boarding activities, with clear contact details displayed in boarding houses.
- Independent Listener arrangements are in place and communicated to pupils.
- Safeguarding audits are completed annually using the Welsh Government audit tool, and findings are reported to the Advisory Committee.
- Risk assessments for boarding environments, visiting speakers, and non-school activities on site are conducted and documented.
- The College maintains compliance with online safety standards, including Welsh Government filtering and monitoring requirements, and ensures pupils are educated on safe use of technology.
- All safeguarding records, including allegations and low-level concerns, are retained in line with Welsh Government guidance and BSA best practice.
- The College promotes a culture of listening to pupils, equality, and respect, ensuring reasonable adjustments for SEND and protected characteristics under the Equality Act 2010.

This statement confirms that safeguarding and child protection are embedded across all aspects of school and boarding life, meeting both statutory and best practice standards.

16. Version History:

Version	Author	Date	Comments
1	Deputy Head / DSP	July 2018	Initial draft for discussion
2	SLT	Sept 2019	To bring in line with College Handbook
3	SLT	Sep 2024	
4	LDA	Nov 2024	
5	MTP	May 2025	Changed Board of governors to board of advisories Changed ICH to TED
6	MTP	June 2025	ISSR 2003 changed to ISSR 2024
7	MTP	Nov 2025	Added compliance statement at the end