



## Safeguarding and Child Protection Policy

<b>Contents</b>	<b>Page number</b>
Key External Contacts	<b>3</b>
Key College Contact	<b>5</b>
Policy statement and introduction	<b>7</b>
Concerns about a child	<b>7</b>
Definitions of safeguarding and types and signs of abuse	<b>8</b>
Procedures for dealing with concerns about a child	<b>8</b>
Extra-familial risks and Early Help	<b>9</b>
What staff should do if they have concerns about a child	<b>10</b>
What staff should do if a child is in danger or at risk of harm	<b>11</b>
What staff should do if a child is seen at risk of radicalisation	<b>11</b>
What staff should do if they discover an act of FGM	<b>11</b>
What staff should do if they have concerns that children are at risk from or involved with serious violent crime	<b>12</b>
How should staff respond to an incident of nudes and semi-nudes being shared by pupils	<b>12</b>
What staff should do if absent from education	<b>13</b>
What staff should do if a child needs a social worker	<b>14</b>
What staff should do if a child needs mental health support	<b>14</b>
Arrangements for dealing with child on child allegations (including child on child sexual violence and harassment)	<b>15</b>
What staff should do if they have concerns about another staff member	<b>14</b>
What staff should do if they have concerns about safeguarding practices in the College	<b>15</b>
Dealing with safeguarding concerns and allegations about supply teachers and contractors	<b>18, 22</b>
Dealing with concerns or allegations that do not meet the harm threshold	<b>23</b>
Safer Recruitment	<b>24</b>

Management of safeguarding	<b>25</b>
Training of all staff	<b>26</b>
Training of DSL/DDSL	<b>27</b>
Oversight of safeguarding including arrangements for reviewing policies and procedures	<b>27</b>
The College's arrangements to fulfil other safeguarding responsibilities	<b>28</b>
Teaching children how to keep safe	<b>28</b>
Filtering and monitoring	<b>28</b>
Relationships Education and/or Relationships and Sex Education	<b>29</b>
Looked after Children	<b>29</b>
Arrangements for visiting speakers	<b>29</b>
Arrangements for lone working and the use of College premises for non-College activities	<b>30</b>
Early Years provision safeguarding arrangements	<b>30</b>
Disqualification from working in childcare	<b>30</b>
Use of mobile phones and cameras	<b>30</b>
DSL for Early Years	<b>31</b>
Duty to notify OFSTED	<b>31</b>
Appendix 1: Signs and Types of Abuse	<b>32</b>
Appendix 2: Flowchart for concerns about a child	<b>43</b>
Appendix 3: Flowchart for child on child sexual violence and sexual harassment	<b>44</b>
Appendix 4: Flowchart for dealing with low-level concerns	<b>45</b>
Appendix 5: Child missing procedures	<b>46</b>

## KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer</b>	<p>Andrea Garcia-Sangil TEL: 01992 556372 EMAIL: <a href="mailto:Andrea.Garcia-Sangil@hertfordshire.gov.uk">Andrea.Garcia-Sangil@hertfordshire.gov.uk</a> <a href="mailto:LADO.referral@hertfordshire.gov.uk">LADO.referral@hertfordshire.gov.uk</a></p>
<b>Local Authority Children’s Social Services</b>	<p>Hertfordshire Children’s Social Care TEL: 0300 123 4043 Essex Safeguarding Children Partnership EMAIL: <a href="mailto:initialresponseteam@essex.gcsx.gov.uk">initialresponseteam@essex.gcsx.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 0345 6061212</p>
<b>Multi-Agency Safeguarding Hub (Herts)</b>	<p>TEL: 01438 737511 (operational Mon-Thurs 9am to 5pm; Friday 9am to 4pm)</p>
<b>Support and Advice about Extremism</b>	<p><b>Anti-Terrorism Hotline</b> Tel: 0800 789 321 (available 24/7)</p> <p><b>Herts CC Prevent Programme Manager –</b> <a href="mailto:Sophie.lawrence@hertfordshire.gov.uk">Sophie.lawrence@hertfordshire.gov.uk</a> <b>Tel: 0777 3094897</b></p> <p><b>Local Authority Police (for Channel referrals)</b> <a href="mailto:prevent@herts.pnn.police.uk">prevent@herts.pnn.police.uk</a></p> <p><b>Department for Education</b> NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a></p>
<b>NSPCC Whistleblowing Advice Line</b>	<p>ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>NSPCC Report Abuse in Education Advice Line</b>	<p>TEL: 0800 136 663 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>

<b>Disclosure and Barring Service</b>	<p>ADDRESS:  DBS customer services  PO Box 3961  Royal Wootton Bassett SN4 4HF  TEL: 03000 200 190  EMAIL: <a href="mailto:customerservices@dbs.gov.uk">customerservices@dbs.gov.uk</a></p>
<b>Teaching Regulation Agency</b>	<p>ADDRESS: Teacher Misconduct</p>
	<p>Ground Floor South Cheylesmore House 5 Quinton  Road Coventry CV1 2WT  TEL: 0207 593 5393  EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
<b>OFSTED Safeguarding Children</b>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm)  EMAIL: <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a></p>
<b>Independent Schools Inspectorate</b>	<p>TEL: 0207 6000 100  EMAIL: <a href="mailto:concerns@isi.net">concerns@isi.net</a></p>

## KEY COLLEGE CONTACTS

### Designated Safeguarding Lead ("DSL") and Deputy Designated Safeguarding Leads (DDSLs)

#### Main DSL for the College

Jane Pawulska TEL: 07483 064247

EMAIL:

[jane.pawulska@bishopsstortfordcollege.org](mailto:jane.pawulska@bishopsstortfordcollege.org)

#### Deputy DSLs (Senior School)

Richard Honey TEL: 07483 064291

EMAIL:

[richard.honey@bishopsstortfordcollege.org](mailto:richard.honey@bishopsstortfordcollege.org)

Alex Swart-Wilson

EMAIL: [alex.swart-wilson@bishopsstortfordcollege.org](mailto:alex.swart-wilson@bishopsstortfordcollege.org)

Sasha Gunes

EMAIL: [sasha.gunes@bishopsstortfordcollege.org](mailto:sasha.gunes@bishopsstortfordcollege.org)

#### DSL (Prep School) Imogen

Cowan Tel: 07483064244 EMAIL:

[imogen.cowan@bishopsstortfordcollege.org](mailto:imogen.cowan@bishopsstortfordcollege.org)

#### DDSL (Shell -Prep School)

Kirsty Brooks

Tel: 07483 064232

EMAIL: [kirsty.brooks@bishopsstortfordcollege.org](mailto:kirsty.brooks@bishopsstortfordcollege.org)

#### DDSL (L3rd and U3rd Prep School)

Rupert Snow

EMAIL: [rupert.snow@bishopsstortfordcollege.org](mailto:rupert.snow@bishopsstortfordcollege.org)

#### DDSL (Form 1 and 2 Prep School)

Joe Surrage

EMAIL: [joe.surrage@bishopsstortfordcollege.org](mailto:joe.surrage@bishopsstortfordcollege.org)

#### EYFS DSL

Charlotte Cuthbert TEL: 01279

838626 EMAIL:

[charlotte.cuthbert@bishopsstortfordcollege.org](mailto:charlotte.cuthbert@bishopsstortfordcollege.org)

#### DSL Key Stage One (Pre-Prep)

Joanne Wallace(Head of Pre-Prep) Tel: 01279

838626

EMAIL:

[joanne.wallace@bishopsstortfordcollege.org](mailto:joanne.wallace@bishopsstortfordcollege.org)

<b>Designated Teacher for Looked After Children</b>	Jane Pawulska (main DSL) See above
<b>Head</b>	John Maguire TEL: 01279 838606 EMAIL: <a href="mailto:head@bishopsstortfordcollege.org">head@bishopsstortfordcollege.org</a>
<b>Governors</b>	<p><b>Chair of Governors</b> Mr Guy Baker EMAIL: <a href="mailto:governors@bishopsstortfordcollege.org">governors@bishopsstortfordcollege.org</a></p> <p><b>Nominated Safeguarding Governor - Mrs Pauline Mullender</b> EMAIL: <a href="mailto:governors@bishopsstortfordcollege.org">governors@bishopsstortfordcollege.org</a></p>

## POLICY STATEMENT AND INTRODUCTION

This policy applies to Bishop's Stortford College which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) and is available on the College website or by requesting a hard copy.

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2024) ("*KCSIE*")
  - *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)*
  - *KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children* (2023) ("*WT*")
  - *WT refers to the non-statutory advice: Information sharing (July 2018)*
- *Prevent Duty Guidance: for England and Wales* (2023) ("*Prevent*"). *Prevent* is supplemented by non-statutory advice and a briefing note:
- *Relationships education, relationships, and sex education (RSE) and health education* (September 2021).
- The Charity Commission guidance *Safeguarding and protecting people for charities and trustees* (June 2022)]

This policy also takes into account the procedures and practice of Hertfordshire as part of the inter-agency safeguarding procedures set up by the Hertfordshire Safeguarding Children's Partnership. Where a child resides in Essex, Essex Safeguarding Children's Board procedures are followed.

## CONCERNS ABOUT A CHILD

The College has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The College adopts a 'whole school' approach to safeguarding, ensuring 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 College, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The College has arrangements for listening to children and providing early help. Families First is Hertfordshire's strategy for early help for families. A directory of early help services is available at [www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) which will help practitioners and families find information and support to prevent escalation of needs and crisis. If early help is appropriate, the DSL or a Deputy will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate.

## Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others, for example, through witnessing domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (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
- exploitation

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.

### **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 Governing Council recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the College 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 GDPR should 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 Lead ("DSL").

The Governing Council 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 that 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 DSL 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 recorded via CPOMS by the person reporting it or via the DSL /DDSL for staff who do not have direct access to CPOMS. 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 Parts one and two of *KCSIE*.

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 the DSL or their deputy).

Where there is a safeguarding concern, the College 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 College manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The College operates its processes with the best interests of the pupil/s at their heart.

#### **Extra-familial risks and Early Help**

Safeguarding incidents and/or behaviours can be associated with factors outside the College and can occur between

children outside school. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The College 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 College 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, neglect or exploitation.

## **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 anti-social 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
- Has experienced multiple suspension, is at risk of being permanently excluded
- 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, neglect and exploitation 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 persistently absent from education, including persistent absences for part of the school day
- In cases of non-violent harmful sexualised behaviours

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 DSL. The DSL will consider the appropriate action to take in accordance with the Hertfordshire Safeguarding Children's Partnership or Essex Safeguarding Children Board's referral threshold documents. The DSL 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.

## **What staff should do if they have concerns about a child**

If staff (including governors, 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 DSL to agree a course of action, although anyone 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 DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and dated. Copies should be retained.

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

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer 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 DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and dated. Copies should be retained.

The College's three safeguarding partners are: **Hertfordshire** County Council, Hertfordshire Constabulary. The two local Clinical Commissioning Groups: East and North Herts CCG and Herts Valley CCG. A full copy of their local procedures can be found [Hertfordshire Safeguarding Children Partnership | Hertfordshire County Council](#)

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

Staff should follow the College's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. 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 the anti- terrorism hotline on 0800 789 321. Advice and support can also be sought from children's social care. Referrals can be made to [prevent@herts.pnn.police.uk](mailto:prevent@herts.pnn.police.uk)

The College, in recognition that pupils may be at risk of 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 Head, DSL team and governors responsible for safeguarding to ensure the College's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised. Further local advice can be found via [5.3.9 Prevent Guidance \(proceduresonline.com\)](#).

### **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 DSL 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 DSL 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 refer 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 AirDrop 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 DSL as soon as possible.

The DSL will follow government guidance via [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people). This includes the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. Nudes and semi-nudes can be shared online via social media, gaming platforms, chat apps, forums, or involve sharing devices using offline services. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nudes are not always sexually or criminally motivated. This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

#### What to do if an incident comes to your attention

Report it to the DSL immediately. Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download. This is illegal. In exceptional circumstances, it may be necessary for the DSL only to view the image to safeguard the child or young person. That decision rests on the professional judgement of the DSL.

If you have already viewed the imagery by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL and seek support.

Do not delete the imagery or ask the young person to delete it.

Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.

Do not share information about the incident with other members of staff, the young person(s) it involves, or their, or other, parents and/or carers.

Do not say anything to blame or shame the young person(s) involved.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

The DSL's role is to:

- Hold 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.
- Carry out interviews with the children involved (if appropriate).
- Inform parents and carers at an early stage and keep 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.
- Carry 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 DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared 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 Head. Records will be kept in line with statutory requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained.

### **What staff should do if a child is absent from education**

Children who are absent from education for prolonged periods of time and/or on repeat occasions can be a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the College's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. The College's procedures for

unauthorised absence and for dealing with children who go missing from school are outlined in the Missing Pupil Policy in Appendix 5.

Where reasonably possible, the College will hold more than one emergency contact number for each pupil to provide the College with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

The College will report to Hertfordshire Local Authority a pupil who fails to attend school regularly or has been absent from school without the College's permission for a continuous period of 10 school days or more.

### **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 DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. 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 unexplainable and/or persistent absences from education, or 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 College has an important role to play in supporting the mental health and wellbeing of its pupils. 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. The College aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils. Further information and guidance can be found in the Mental Health and Well-Being Policy

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. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support schoolteachers 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, contractors and the DSL/DDSL), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at Hertfordshire ('LADO').

## **What staff should do if they have concerns about safeguarding practices in the College**

The College 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 College's safeguarding systems, these should be raised in accordance with the College's whistleblowing procedures which can be found in the Whistle-Blowing Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the College 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.

## **ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT) –see flow-chart in Appendix 3.**

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, upskirting, 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.

Where there is an allegation or concern that a child has abused others, Section 4.4 of the Hertfordshire Safeguarding Children Partnership Procedures Manual, 'Children Who Abuse Others' is used:

[http://hertsscb.proceduresonline.com/chapters/p\\_chil\\_abuse.html](http://hertsscb.proceduresonline.com/chapters/p_chil_abuse.html)

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 of school should not be downplayed and should be treated equally seriously. All forms of child on child abuse must be raised as safeguarding concerns with the DSL or DDSL.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. The College 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 College acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the College, such abuse may still be taking place and is simply not being reported. The College will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the College 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 College 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 College 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 College'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 College 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 College 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 peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The College will consider extra pastoral support for those children such as counselling. The SEND Code of Practice is a source of information and support available from specialist organisations including SENDIASS. The College also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The College recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child on child abuse. The College will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

The College takes the following steps to minimise the risk of child on child abuse:

- Teaching about child on child abuse and consequences in PSHE and Relationships and Sex Education
- Teaching children that the law on child on child abuse is there to protect rather than criminalise them
- Encouraging an open, listening culture in which children are believed.

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 during the investigation. The College will take advice from the Hertfordshire Safeguarding Children Partnership (HSCP) 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 College will ensure that, subject to the advice of the HSCP, 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 College and advice will be sought as necessary from the HSCP and/ or the police as appropriate. The College will have regard to the procedures set out in *KCSIE* and the *SVSH* at all times.

The victim may ask the College not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL 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 DSL or DDSL 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. Where a report has been made to the police, the College 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 DSL 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 DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the Hertfordshire Safeguarding Children Partnership referral process.

The College's approach to sending nudes or semi-nudes is that it is a safeguarding issue which may be linked to child on child abuse.

The College 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 DSL/DDSL and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL 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 College especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (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 College 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 College will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The College 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 DSL 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 is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing College premises (including during any before or after school-based activities), and College transport. The College 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 College will consider intra familial harms and whether any support for siblings is necessary following an incident.

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

The College 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 College's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the College will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the 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 Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the College's behaviour policy.

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

The College's procedures for managing allegations against staff (including supply staff, volunteers and contractors who are currently working in the College whether in a paid or unpaid capacity) follow DfE statutory guidance and Hertfordshire Safeguarding Children Partnership arrangements (*Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5*) 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.

Allegations that do not meet the above harm test should be dealt with using the College'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 (via 101) 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, before contacting the LADO, the College 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 College 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. In borderline cases, the College may discuss informally with the LADO on a no-names basis.

When dealing with an allegation about a staff member, the College will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation. The College may receive an allegation relating to an incident that happened when an individual or organisation was using College premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the College follows safeguarding policies and procedures, including informing the LADO.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the relevant Head. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head is absent or is the subject of the allegation or concern, reports should be made to Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. 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 College's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.
3. 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.
4. 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.

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the College 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 College 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 College 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 accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
  - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

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 College 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* 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 College 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.

6. 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.
7. 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 College 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 College. 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.
8. 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.

9. 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).
10. 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.
11. 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 College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The College 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 College 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).
12. 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 College'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 College will make a referral to the DBS.

The College has a duty of care to its staff, and whilst the welfare of a child is paramount, the College must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The College 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 *KCSIE* 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. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other 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.

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 DSL 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 Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the College'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 College will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

## **DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS**

The College's procedures for managing allegations against staff above also apply to staff not directly employed by the College, for example, supply teachers provided by an employment agency or business ('the agency'). The College 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 College 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 College 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 College 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 College during the investigation.

When using an agency, the College 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 College first, the College must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

## **DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD).**

**See also**

**flowchart in Appendix 4.**

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of 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 College 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 College's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The College's **Staff Code of Conduct** can be found in the Staff Handbook. The aim of the Code of Conduct is to provide clear guidance about 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.

Low-level concerns should be shared responsibly and quickly with the relevant Head. The Head should record all low-level concerns in writing. This should include:

- details of the concern
- the context in which it arose
- evidence collected by the DSL where the concern was raised via a third party
- the decision categorising the type of behaviour
- action taken
- the rationale for decisions and action taken
- the name of the individual sharing the concerns (respecting any wishes to remain anonymous as far as possible).

The College Head is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Head without delay so that they can be recorded and dealt with appropriately,



sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

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

The records will be kept confidential and 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 until the individual has left employment.

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 College 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 College's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the College will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will 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 College is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.

## **SAFER RECRUITMENT**

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

There is a need for ongoing vigilance which includes all staff and a culture which considers matters inside and outside the workplace, including online.

Members of the teaching and non-teaching staff at the College 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 College may undertake an online update check through the DBS Update Service.



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

The College'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 Visiting Speaker Policy.

The College's procedures for managing contractors attending the College site can be found in the 'Contractors at Work Policy'.

## **MANAGEMENT OF SAFEGUARDING**

The College's Senior School DSL is Jane Pawulska who is a member of the leadership team. The Prep School DSL is Imogen Cowan who is a member of the leadership team. The Pre-Prep DSL is Jo Wallace.

The relevant Deputy DSLs are the people to whom reports should be made in the absence of the DSLs if the matter is urgent and cannot be logged on CPOMS. This ensures there is cover for the role at all times.

The DSL team's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the College, including online safety. The DSL's responsibility is to maintain an overview of safeguarding within the College, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the College's policies and procedures in practice. The DSL works with the Governing Council to review and update the College's safeguarding policy.

Where a pupil leaves the College, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) 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. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school 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.

The DSL regularly reviews the College's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL and/or DDSL will always be available in person during school hours for staff in the College to discuss any safeguarding concerns. If a DSL/DDSL is not available in person, they can be contacted via e-mail. For out of hours/out of term activities, the College's arrangements are that the DSLs and/or Heads are contacted.

The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with *WT*. "*NPCC- When to call the police*" can assist the DSL or DDSL understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The

DSL or DDSL will also be responsible for leading on Mental Health and may discuss issues confidentially with the School Counsellor where safeguarding concerns are linked to mental health. The DSLs and DDSLs should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

## **TRAINING**

Induction and training are in line with advice from Hertfordshire Safeguarding Children Partnership.

### **All Staff**

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

- the Safeguarding and Child Protection policy (including the policy and procedures to deal with child on child abuse, Prevent and online-safety which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.);
- the role and identity of the DSL team;
- the Behaviour policy and Anti-Bullying Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff code of conduct including the College's whistleblowing procedure and the acceptable use of technologies policy (AUP), staff/pupil relationships and communications including the use of social-media (these can be found in the staff Employment Manual);
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE* at least or, for staff that do not work directly with children, Annex A;
- College leaders and staff who work directly with children will also be required to read Annex B of *KCSIE* (and Part five of *KCSIE*).

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are provided with an induction outlining the main safeguarding and child protection principles and arrangements, the identity of the DSL team and how to report a concern.

All staff are also required to:

- Read at least Part one of *KCSIE* or, for staff that do not work directly with children, Annex A) and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via INSET days or regular updates via briefings or emails.
- Understand key information contained in Part one or, for staff that do not work directly with children, Annex A of *KCSIE*. The College will ensure staff understanding by way of a test.
- Receive training in safeguarding and child protection regularly, in line with advice from the Department for Education and Hertfordshire Safeguarding Children's Partnership. Training will include online safety 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 College provides these via, for example emails, e-bulletins, staff meetings and the National Online Safety platform webinars.

The Governing Council will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the College are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The Governing Council are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the College 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. Provision within the Equality Act includes reasonable adjustments for disabled children and young people.

## **DSL(s)**

The DSL receives updated child protection training at least every two years to provide them 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 at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the Hertfordshire's approach to *Prevent* duties [and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the College will support the DSL in developing their 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. DSLs ensure that accurate records are kept of any concerns, including notes of any action taken, decisions reached and the outcome.

The DDSLs are trained to the same level as the DSLs.

## **OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Pauline Mullender is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the College. She is a member of the governing body.

The College considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the College's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. This happens via a meeting with the DSL team and

Pauline Mullender. The College draws on the expertise of staff, including the DSL(s), in shaping the College's safeguarding arrangements and policies.

The College's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.

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

## **THE COLLEGE'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

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

The Governing Council ensures 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 of College, in order to reduce risks and build resilience, including to 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 College 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 College's assembly programme and also embedded in PSHE and Relationships Education and Relationships and Sex Education ("RSE").

### **Filtering and Monitoring**

The College has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the College's IT system. The College's layered solution consists of a firewall and an independent advanced filtering application for all devices onsite, the 1 to 1 devices continue to have the advanced filtering system applied when offsite.

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 scams (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 College 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. Further detail of the College's policy and procedures in relation to online safety can be found in the E-Safety Policy which also includes detail on the use of mobile and smart technology in the College, including the School's management of the associated risks, and the College's IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through College systems. These systems will be reviewed periodically. The DSL takes lead responsibility in this area. The Governing Council does all it reasonably can to limit children's exposure to risk from the College's IT system by ensuring that the College has

appropriate filtering and monitoring systems in place and regularly reviews their effectiveness. They ensure that the Senior Management Team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively, and know when to escalate concerns when identified. This involves taking into account the number of and age range of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks. The filtering and monitoring system is informed in part, by the risk assessment required by the Prevent Duty. The College adheres to the Department for Education filtering and monitoring standards:

[Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges-filtering-and-monitoring-standards-for-schools-and-colleges). This sets out that clear roles and responsibilities are assigned to manage filtering and monitoring, that there is at least an annual review of provision, that harmful and inappropriate content without unreasonably impacting teaching and learning, and that effective monitoring strategies are in place to meet safeguarding needs.

The College will liaise with parents to reinforce the importance of children being safe online and the systems the College 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 College their child is going to be interacting with online.

The College ensures that an appropriate level of security protection procedures are in place to safeguarding systems, staff and learners. These are reviewed periodically to keep up with evolving cyber-crime technologies.

### **Relationships Education AND/OR Relationships and Sex Education (“RSE”)**

Relationships Education AND/OR RSE has been compulsory since September 2020. The College 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 College will have regard to the DfE’s statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education AND/OR RSE.

Relationships Education AND/OR RSE will form part of the School’s PSHE programme.

### **Looked after children**

The Governing Council ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

DSLs are the designated member of staff who have responsibility for their welfare and progress. The College ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for visiting speakers**

The College has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The College’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 College is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the College. 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 College 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 College site, will be supervised by a College employee. On attending the College, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The College shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

### **Arrangements for Lone-working and the use of College premises for non-College activities.**

Additional measures are taken to safeguard pupils in one-to-one tuition. See 'Lone Working Policy'. Where the College is used as premises for non-College activities, safeguarding arrangements are organised by the Operations and Commercial Manager together with external partners. When services or activities are provided under the direct supervision or management of College staff, the College arrangements for child protection apply. This applies regardless of whether or not the children who attend any of these services or activities are children who attend the College.

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

### **Disqualification from working in childcare**

Where staff work in, or are involved in the management of, the College's early years or provision of care of pupils under the age of eight, the College will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the College's safer recruitment practices, further details of which can be found in the College's Recruitment and Selection Policy.

The College records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the College will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the College will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

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

The College's policy on the use of mobile phones and cameras in the setting can be found in the School's Acceptable

Use Policy. Staff are not permitted to use their personal mobile devices or cameras to take images in College. Staff who wish to use take photographs or video of pupils (whether on a personal or College device) must first speak with the Head to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in College for any other reason must first speak with the Head. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Head of the Pre-Prep.

### **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Charlotte Cuthbert.

### **Duty to notify Ofsted**

The College will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the College is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the College became aware (or ought reasonably to have become aware) of it.

The College will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).



## APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All College 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 DSL or DDSL.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside of these environments. All staff, but especially the DSL team 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 DSL or DDSL.**

**Physical abuse:** a form of abuse which may involve hitting, shaking, hair pulling, biting, 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 sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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 sex (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 upskirting, 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. Further information can be found in the *SVSH* advice.

**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 sex, 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 sex. 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. Further information can be found in the *SVSH* advice.

**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 AirDrop 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 may be 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 them 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.

**Upskirting:** 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 sex 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, truanting 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 upskirting. Safeguarding issues can also be linked to, for example, children having unexplainable and/or persistent absences from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families<sup>219</sup>); 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 sex) 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 below CCE indicators 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 may be 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 DSL (or a deputy), 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, and education.

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 DSL or DDSL.

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 medical examination.

**If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or DDSL) 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 to personally 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 DSL 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 DSL 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 College'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.

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. Since February 2023 it is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday, even if violence, threats, or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. 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 [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk).

**1. Radicalisation:** Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence. Extremism is the vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

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 a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be vulnerable to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. 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 at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL or DDSL who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL 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 DSL as appropriate.

**Lesbian, gay, bi or gender questioning ("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 College 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.

School staff can contact Operation Compass on 0204 513 9990 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 College 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 may be at risk of homelessness they should talk to the DSL 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 go missing from school or education:** A child going missing from the College is a potential indicator of a range of safeguarding issues including 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 College's procedures for dealing with children who go missing, particularly persistently. The College's procedure for dealing with children who go missing can be found in the College's Missing Children Policy in Appendix 2. All unexplained absences will be followed up in accordance with the Attendance and Registration Policy.

The College shall inform the local authority of any pupil who is going to be added to or deleted from the College's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).<sup>245</sup> 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 College 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 College's permission for a continuous period of 10 school days or more.

Action should be taken in accordance with this policy if any absence of a pupil from the College gives rise to a concern about their welfare. The College's policy supports identification of abuse and provides preventative measures against the risk of the child going missing 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.

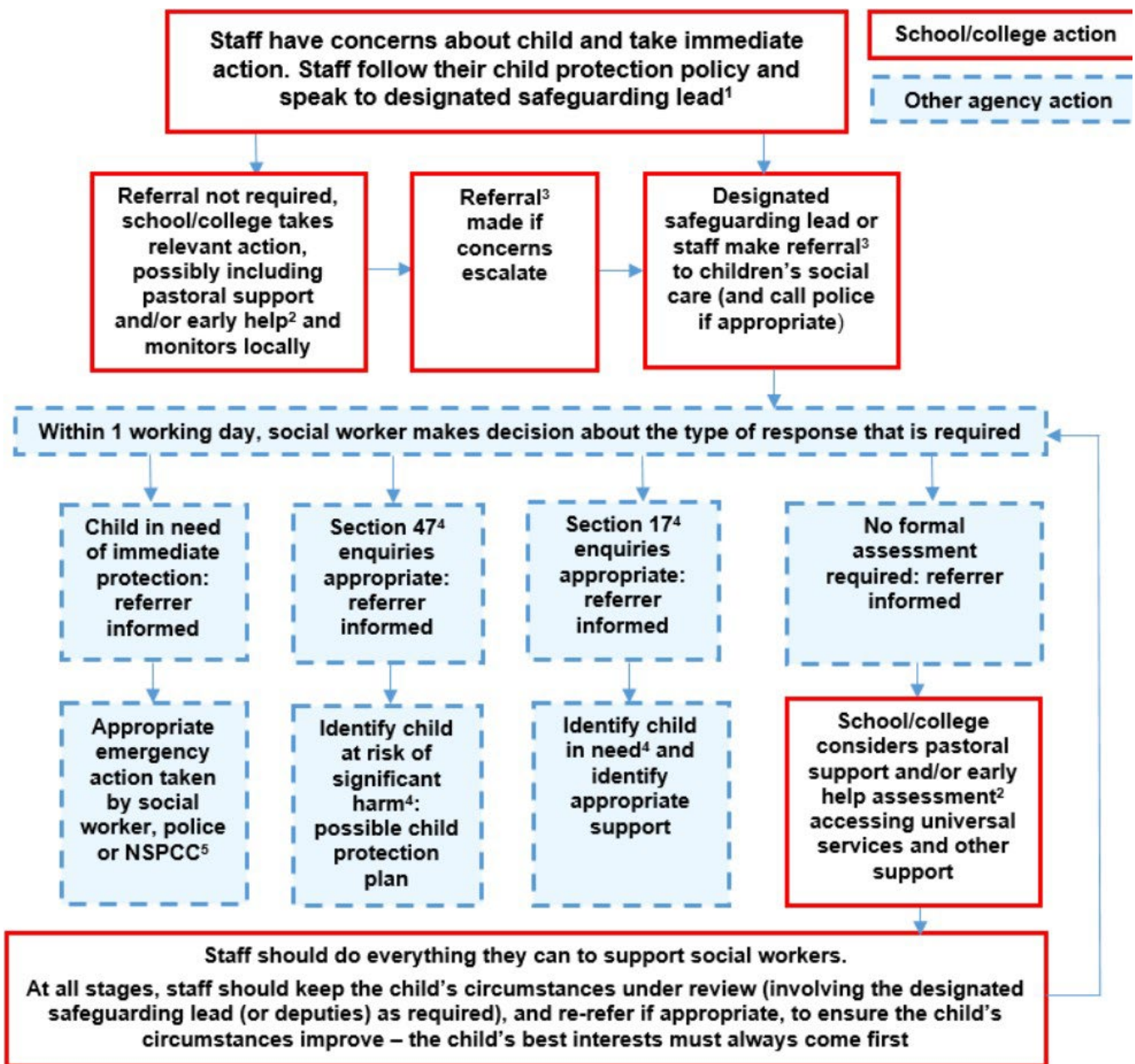
It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

**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.

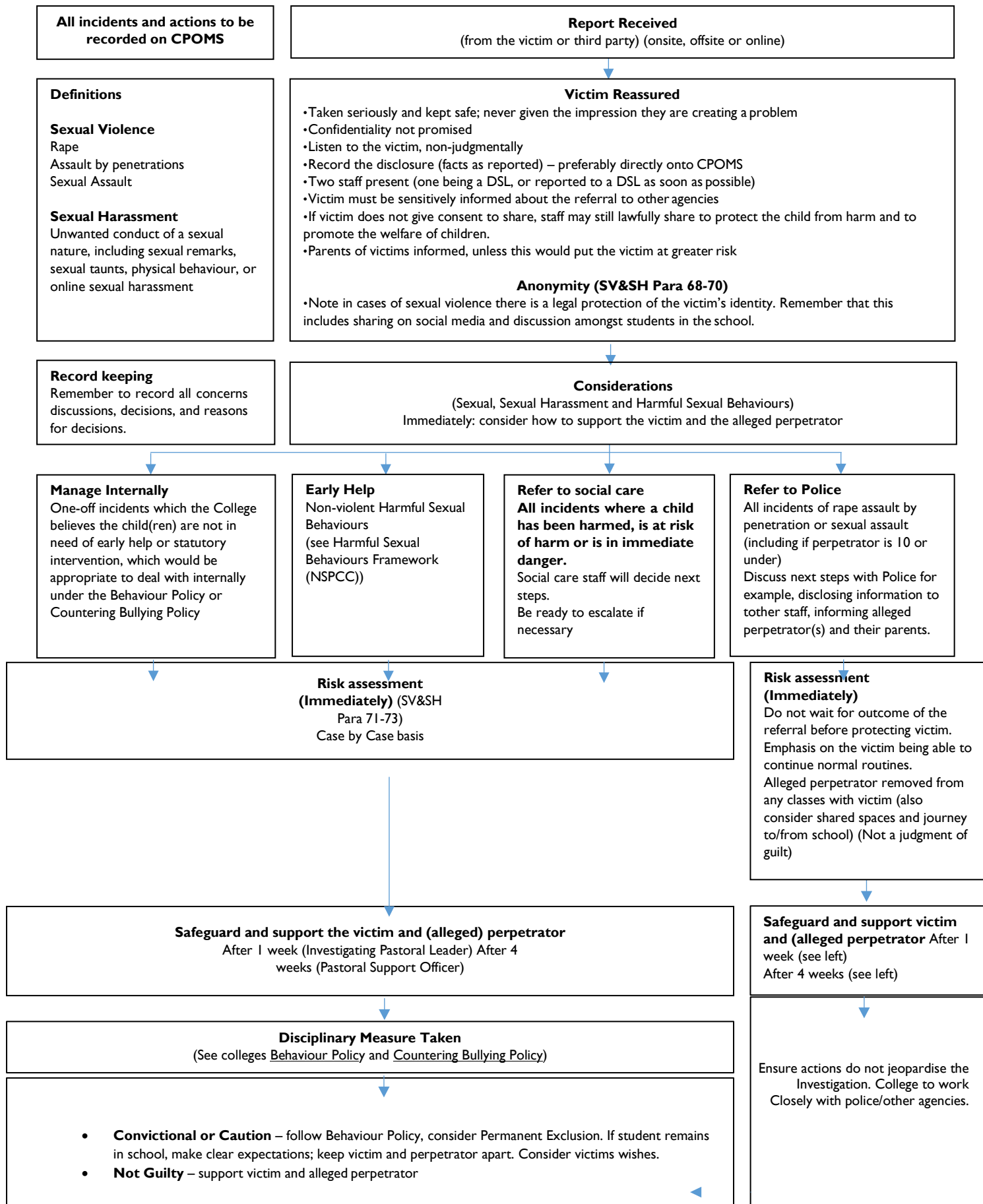
Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The College 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.



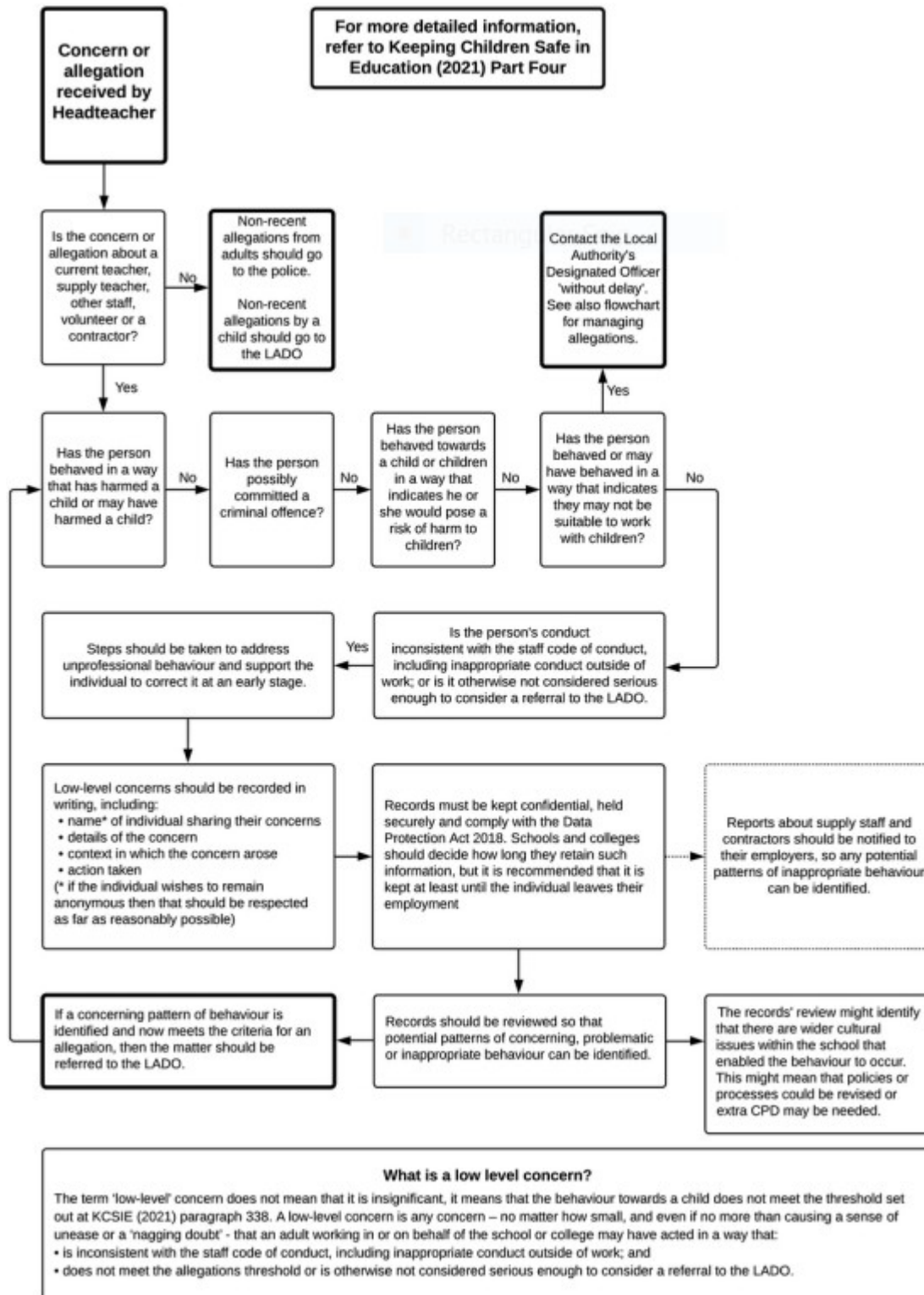
### Sexual Violence and Sexual Harassment Flow Chart

Process for managing reports of sexual violence and/or sexual harassment at Bishops Stortford College.



- **No further action** - support victim and alleged perpetrator

## Appendix 4 Process to follow when a Low-Level Concern is raised





## **Appendix 5**

### **Missing Pupils**

#### **Missing Senior School Pupil Procedure**

If a pupil is missing from the Senior School at a time when he or she is expected to be present, the following procedure should be implemented. It is noted that the pupil's absence may be due to any number of circumstances; personal, social, academic or a breach of discipline. It is important, therefore, that staff do not jump to conclusions. The Housemaster/Housemistress or their spouse or deputy will take charge of investigating whether the pupil is actually missing and/or conduct the search in the case of boarders. Available staff will conduct the search for a Day Pupil. Every effort must be taken to trace the missing pupil immediately, once their absence is detected.

- Try to contact through their mobile phone at regular intervals. If the reply is through voicemail, inform that pupil that you are aware of their absence from College, and that their parents will be informed, and that after a certain length of time the police will also be contacted, unless they make contact with you before a named time.
- Ask as many pupils in the House as possible if they know anything about the reasons the pupil is missing or where they might be, or if they know whether they are safe. Try to find out from other pupils if the missing pupil has 'run away' for social or academic reasons, whether they have been bullied, are in trouble, or have fallen out with someone etc.
- Check with the Medical Centre that the missing pupil has not been admitted, and that somehow the information has not been passed on.
- Organise a search of the House, and if appropriate contact other Houses, and send a search party to any other areas of the campus where the pupil may have gone.
- Check with any members of staff to whom the pupil may have gone.

Once it is established that the pupil is missing, the Head and Head of Boarding and/or Deputy Head (Pastoral) must be informed and a decision taken as to the timing of the next stages, which, depending upon the circumstances will include the following:

- A search outside the College by House staff and SMT including train stations, bus stations and where appropriate, alerting their staff.
- Communication with close friends of the pupil to elicit their help, particularly through the use of digital media.
- If the pupil has a sibling in any part of the College, take appropriate action to either involve or protect the sibling.
- Contact with parents (or guardians if the missing pupil is an overseas pupil).
- Contacting the Head. In the case of overseas boarders, the Head must advise the Admissions Officer so that the unauthorised absence can be reported to the UK Border Agency within ten working days.
- Contacting the police (Telephone number 101, or 999 if considered an emergency).

(NB. It may be sensible to assemble the whole House to provide an opportunity for any pupil to pass on any relevant information to the Housemaster/Housemistress, either publicly (most likely), in private or by passing a note).

Once the pupil has been found and returned to College, it is important that the incident is 'followed up' carefully. This may involve any of the following (if appropriate):

- A letter to parents from the Head.

- Some sort of disciplinary procedure (if the absence has been due to a clear and deliberate breach of College discipline).
- An agreed plan as to how to overcome any problems which directly or indirectly gave rise to the absence in conjunction with the Deputy Head Pastoral/DSL.
- A discussion involving the Head, Housemaster/Housemistress, and parents as to whether boarding remains in the best interests of the pupil concerned, his/her family and the school.

Documentary records:

A carefully documented record summarising the incident must be kept in the pupil's file for future reference, should such a necessity arise.

NB: In the case of an overseas boarder, who holds a Tier 4 visa, the Bursary is to be informed that that arrangements can be made to notify UKVI if necessary.

If any deficiency were to be found within this Policy, it would be remedied without delay.

### **Missing Prep School Pupils**

If a pupil is missing from the Prep School at a time when they are expected to be present, the following procedure should be implemented. It is noted that a pupil's absence may be due to any number of circumstances; personal, social, academic or a breach of discipline. It is important, therefore, that staff do not jump to conclusions. The Pastoral Deputy Head, in liaison with the Head of Year, will take charge of investigating whether the pupil is actually missing and/or instigate the search. In the case of boarders, the boarding Housemaster will be responsible; see below for specific steps to follow for a Missing Prep School Boarder. Available staff will conduct the search for a Day Pupil. Every effort must be taken to trace the missing pupil immediately, once their absence is detected.

- Check with the PS Reception that the pupil has not gone home.
- Check with the Medical Centre that the missing pupil has not been admitted, and that somehow the information has not been passed on.
- Check with the Form Tutor, Head of Year and any members of staff to whom the pupil may have gone. Check with the Learning Support Department, Music Department and Drama Department (LAMDA) that the pupil does not have a timetabled 1:1 lesson.
- Without causing undue anxiety to the pupils, ask as many pupils in the Form/ friendship group as possible if they know anything about the reasons the pupil is missing or where they might be, or if they know whether they are safe. Try to find out from other pupils if the missing pupil has run away for social or academic reasons, whether they have been bullied, are in trouble, or have fallen out with someone etc.
- Organise a search of the School, widening the search as necessary to cross College teaching areas. Send a search party to any other areas of the campus where the pupil may have gone.
- Check the route home for those pupils for whom walking would be feasible.

Once it is established that a pupil is missing, the Head and Senior Deputy Head must be informed (if they have not already been) and a decision taken as to the timing of the next stages, which, depending upon the circumstances will include the following:

- A search outside the College by SMT and other available staff including train stations, bus stations and where appropriate, alerting their staff.
- Communication with close friends of the pupil to elicit their help.
- If the pupil has a sibling in any part of the College, take appropriate action to either involve or protect the sibling.
- Contact with parents (or guardians if the missing pupil is an overseas pupil).

- Contacting the College Head.
- Contacting the police (Telephone number 01707 354000, 101, or 999 if considered an emergency).

Once the pupil has been found and returned to College, it is important that the incident is followed up. This may involve any of the following (if appropriate):

- A meeting with, or a letter to, parents from the Head or Senior Deputy Head.
- Some sort of disciplinary procedure (if the absence has been due to a clear and deliberate breach of College discipline).
- An agreed plan as to how to overcome any problems which directly or indirectly gave rise to the absence in conjunction with the Pastoral Deputy Head /DSL.

Documentary records:

A carefully documented record summarising the incident must be kept in the pupil's file and on CPOMS for future reference, should such a necessity arise.

### Missing Prep School Boarder

If a boarding pupil is absent from Grimwade at a time when he or she is expected to be present it is important that, in the first instance, staff do not become alarmist and jump to conclusions. The pupil may be involved in a legitimate school activity e.g. sports match, music practice or rehearsal etc.

Every effort should be made to trace the missing pupil immediately or account for their whereabouts.

### Steps to Take

#### 1. Contact one of the Houseparents

Check master register sheet, lists of extra-curricular events, Housemaster's and Matrons' diaries, the school calendar and Medical Centre

#### 2. Ask the pupils if they have any knowledge of the missing pupil's whereabouts

If steps 1 or 2 do not shed any light the Housemaster or Spouse (or senior member of staff on duty) should take charge of the search.

#### 3. Check all areas of the House

#### 4. Search the campus

#### 5. Check with available and/or relevant staff directly by phone (list in Housemaster's office)

#### 6. Once it becomes clear that a pupil is missing, contact the Prep School Head (Rachael Cox) Tel: 07751 170456

In his absence, the following should be contacted in order:



Senior Deputy Head: Graham Millard Tel: 07771 742741  
Deputy Head (Pastoral): Imogen Cowan Tel: 07791 694646

7. The first of the above contacted will contact the College Head Tel: 07972 651550
8. Contact parent Parent/Guardian
9. Contact Police (01707 354000)

Once the pupil has been found and returned to College, it is important that the incident is followed up. This may involve any of the following (if appropriate):

- A meeting with, or a letter to, parents from the Housemaster or Head.
- Some sort of disciplinary procedure (if the absence has been due to a clear and deliberate breach of College discipline).
- A discussion involving the Head, Housemaster and parents as to whether boarding remains in the best interests of the pupil concerned, their family and the school.
- In the case of an overseas boarder, who holds a Tier 4 visa, the Bursary is to be informed so that arrangements can be made to notify UKVI if necessary.

**Pre-Prep Missing Child Procedure and arrangements for when a child  
is not collected from the Pre-Prep**

**Rationale**

The welfare of children in our care is paramount. It is vital that EVERY member of staff has equal responsibility in ensuring the safety of the children and knowing where they are.

**Systems in place to minimise the risk of children going missing:**

- Appropriate steps are taken to ensure that the premises and surrounding site is secure.
- The attendance register is taken in the morning (8.30am) and in the afternoon (1.15pm) and the number of children attending recorded. It is the responsibility of every member of staff to be aware how many children are present and a quick head count should be taken at regular intervals.
- Children who arrive late must be recorded in the register and those who leave early should be marked out accordingly. Parents must sign in and out of the 'signing in and out register' held in the Pre-Prep Office.
- Staff with new children should take extra care to be aware of their whereabouts and ensure they know the boundaries of where they can and cannot go. Parents will be advised of our security procedures and be given the opportunity to discuss any concerns, particularly if their child has an adventurous nature.
- Parents must be made aware of the need for supervision of children at all times and of their responsibility to ensure that their child's arrival is acknowledged.
- Children should be counted before going out to play and again when they are lining up to come back indoors. A member of staff should be at the end of the line to ensure no children are left outside. Once inside it must be ascertained that the correct number of children are still present.
- When walking to the Dining Hall, there must be a teacher/teaching assistant at the front and rear of the line. Pupils are to walk in partners and counted in and out of the Dining Hall.
-

**In the event of a child being found to be missing it is vital that prompt action is taken.**

1. **The missing child (children) should be identified and the last known whereabouts recorded.** *(The chances of finding a missing child safe are greatest if the child's absence is noted as soon as possible. Staff must be vigilant in ensuring that children in their classes or those allocated to them for a particular session are present).*
2. **The member of staff present will arrange for the other children to be satisfactorily supervised.** *(The remaining children should be gathered together for a story time/music session. Without alarming them, the children should be asked if they have seen the missing child).*
3. **A systematic search will be carried out to see if the child can be located in the surrounding area.**
  - All toilets, cupboards, under tables, cushions, anywhere a child might hide and other classrooms.
  - Outside areas including Forest School, playground, Adventure Trail and outside learning areas.
  - Check all exits for where a child may have been able to leave the premises or site.
  - Check the immediate school grounds, then expand to include top fields and Prep School and Senior School Campus. Enlist the help of school office staff to search the school and Estate workers to continue searching the school grounds.
4. **The College Head will then inform:**
  - a) **The parents/carers of the child** – *If they do not answer the phone a message must be left on any answering service before attempting alternative numbers. However, if parents do not answer the home phone number **the POLICE** must be called before attempting other child contact numbers. If contacted, parents should be advised to stay at home in case the child arrives there; be advised that we are contacting the emergency services and that a member of staff is searching the route the child may take home.*

*Parents should be asked for information of anywhere else the child may head for e.g. grandparents, other relatives, local park, etc.*
  - b) **The Police and/or any other emergency services** – *The police have the resources to conduct a search and speed is important.*
  - c) **The appropriate ISI officer** – *They will need to know our systems for preventing this occurrence and what happened. It is important that the Head of Pre-Prep keeps a record of events.*
5. **Informing other people** – As soon as possible the following people should be notified-
  - *the Bursar; and*
  - *the Head and Prep School Head. Consideration should be given as to whether the missing child has a sibling in another section of the College.*
6. **Check route home** - *(If the child cannot be located a member(s) of staff should search along a possible route the child might take to get home. Where able they should take a mobile phone to keep in contact. If a member of staff arrives at the house without finding the child, they should make contact with the school for further instructions.)*
7. **A record of events should be written up as a pupil incident by the Head of Pre-Prep or by another member of staff delegated by them.**
8. **Dealing with reactions** – *It is natural that the child's parents will be frightened, distressed and angry. Other parents will be rightly concerned for the safety of their own children. The Pre-Prep staff will also be shocked and upset at any*

*lapse in security. All emotions and reactions must be dealt with in a caring and understanding way. However, until the situation has been fully investigated by all parties, all staff must refer any parent and media enquiries to the Head of Pre-Prep (who will consult with the Bursar and Media/Marketing Dept.).*

## **Arrangements when a child is not collected**

In the event that an authorised adult does not collect a child, agreed procedures are put into practice. These ensure an experienced and qualified practitioner who is known to the child cares for the child safely with minimal upset.

### **Procedures**

1. Parents/carers are asked to provide specific information which is recorded on our Registration Form, including:
  - Home address and telephone number - if the parents do not have a telephone, an alternative number must be given.
  - Mobile telephone number.
  - E mail address.
  - Names, addresses, telephone numbers of adults who are authorised by the parents to collect their child, for example a childminder or grandparent.
  - Information regarding any person who does not have legal access to the child.
  - Emergency contact details.
2. On occasions when parents are aware that they will not be at home or in their usual place of work, they must inform the Teachers and Office.
3. On occasions when parents or the normally authorised person is unable to collect the child, they must inform the teacher or the office so the information can be recorded or passed on. We agree with parents how the identification of the person who is to collect their child will be verified (normally an agreed code word).
4. Parents are informed that if they are not able to collect the child as planned, they must inform us so that we can begin to take back-up procedures. We provide parents with our contact telephone number. We also inform parents that - in the event that their children are not collected by an authorised adult and the staff can no longer supervise the child – the Head of Pre-Prep will take over.
5. If a child is not collected at the end of the day, we go by the following procedures:
  - Any relevant information about changes to the normal collection routines is checked through the Office and teacher.
  - If no information is available, parents/carers are contacted at home or at work.
  - If this is unsuccessful, the adults who are authorised by the parents to collect their child - and whose telephone numbers are recorded on the Registration Form - are contacted.
  - All reasonable attempts are made to contact the parents/carers. If no reply, the recorded emergency contact number will be called.
  - The child stays at school in the care of two supervisory staff until the child is safely collected.
  - If no one collects the child and the staff are no longer available to care for the child, the Head of Pre-Prep will decide on the next form of action which would be to contact Children's Services. No member of staff would take a pupil home with them.
  - A full written report of the incident is recorded.

If a child is not collected after an after-school activity, they will be taken to the Office and supervised by Mrs McGuiness (Pre-Prep Secretary and the Head of Pre-Prep). Parents will be contacted.

## **Monitoring and review**

The Missing Child Policy is constantly being reviewed to take into account any changes with contacts or procedures.

This policy will be monitored by the Head of Pre-Prep, who will report to the Prep School Head on its implementation on a regular basis.