

Safeguarding and Child Protection Policy

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Reviewed by:

Designated Senior Person: Anselm Barker

Date: 14th April 2021

Deputy Designated Senior Person: Julia Fairey

Date: 14th April 2021

Deputy Designated Senior Person: Suzanne Kennedy

Date: 14th April 2021

Deputy Designated Senior Person: Kay Wayman

Date: 14th April 2021

Principal: Stefan Anderson

Date: 14th April 2021

Chair of Governors: Angela Odell

Date: 14th April 2021

1. Policy statement and principles

This policy is one of a series in the school's integrated portfolio of safeguarding documents, policies and procedures. In particular, this policy should be read in conjunction with the Safer Recruitment Policy, Anti-Bullying Policy, Behaviour Policy, Staff Code of Conduct, Acceptable Contact Policy, Positive Mental Health Policy, Absence, Attendance and Missing Pupil Policy, Use of Reasonable Force and Physical Restraint Policy, and the Whistleblowing Policy. A review of the school's child protection policies takes place at least annually, including an update and review by the full board of governors of the effectiveness of procedures and their implementation.

Child protection statement

Tring Park School is committed to acting in the best interests of the child. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We recognise that everyone has a responsibility for safeguarding and promoting the welfare of children and that early intervention is vital.

The procedures contained in this policy apply to all staff and governors and are consistent with those of the Hertfordshire Safeguarding Children Partnership (HSCP). Contact details for agency involvement can be found in section 20 and Appendix B.

Policy principles

- The school's responsibility to safeguard and promote the welfare of children is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support
- Policies will be reviewed at least annually according to the school's Policy Review Cycle unless an incident or new legislation or guidance suggests the need for an interim review. This policy is published and available to all on the school's website. It is also available in the Policy folder on Staff Resources, in the Staff Handbook and from the school office upon request.

Policy aims

- To inform staff, parents, volunteers and governors about the school's responsibilities for safeguarding children.
- To enable everyone to have a clear understanding of how these responsibilities should be carried out.
- To follow procedures in line with the Hertfordshire Safeguarding Children Partnership. The HSCP consists of Hertfordshire County Council, Hertfordshire Constabulary and the two local Clinical Commissioning groups: East and North Herts CCG and Herts Valley CCG

Terminology

- **Safeguarding** and promoting the welfare of children is defined as the process of protecting children from maltreatment, preventing impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- **Child protection** refers to the processes undertaken to protect children who have been

identified as suffering, or being at risk of suffering, significant harm.

- **Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either paid or voluntary capacity. This includes supply staff and volunteers.
- **Child** includes everyone under the age of 18.
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

2. Safeguarding legislation and guidance

In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

- The Children Acts of 1989 and 2004
- Children and Social Work Act 2017
- Section 16 of the Sexual Offences Act 2003
- The Teacher Standards 2012
- Working Together to Safeguard Children (DfE 2018)
- Hertfordshire Safeguarding Children Partnership Inter-agency Child Protection and Safeguarding Children Procedures (electronic)
- Preventing and Tackling Bullying (DfE 2017)
- Health and Safety: responsibilities and duties for schools (2018);
- Regulatory Reform (Fire Safety) Order (2005)
- Boarding Schools National Minimum Standards (2015)
- The Education (Independent School Standards) (England) Regulations 2014 (amended 2018)
- Disqualification under the Childcare Act 2006, (Regulations 2018)
- What to do if you're worried a child is being abused: advice for practitioners, March 2015
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers, (DfE 2018)
- Counter-Terrorism and Security Act 2015 (Section 26)
- Prevent Duty Guidance: for England and Wales 2015
- The use of social media for online radicalisation (July 2015)
- Multi-Agency Statutory Guidance on Female Genital Mutilation (April 2016)
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry. Includes taking someone overseas to force them to marry (whether or not the forced marriage takes place).
- Keeping Children Safe in Education (DfE 2020, updated January 2021) All staff must read Part One and Part Five of this guidance. School leaders and all staff who work directly with children must also read Annex A. Staff can find a copy in S:\Child Protection information\Legislation. It is school policy that all governors must also read part 2 of this guidance. The School will assist staff to understand and discharge their role and responsibilities by providing a copy of this document at induction and providing safeguarding training for new staff which is then regularly, but at least annually, updated for all staff as required via email, bulletins and staff meetings.

Keeping Children Safe in Education (DfE 2020, updated January 2021) states that governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children. Furthermore it also states that governing bodies and proprietors of all schools and colleges should ensure that their safeguarding arrangements take into account the procedures and practice of the local authority as part of inter-agency safeguarding procedures set up by the Local Safeguarding Partners (LSP).

3. Roles and responsibilities

Key personnel

The designated senior person (DSP) for child protection is Anselm Barker, who is the Deputy Principal and also the single point of contact (SPoC) for Prevent.

Contact details: email: dsp@tringpark.com tel: 01442 821661, emergency: 07926 281550

The deputy designated persons are Suzanne Kennedy, who is the Head of Learning Support, Kay Wayman, who is a Senior Housemistress and Julia Fairey, who is a school nurse.

Contact details: email: Suzanne.kennedy@tringpark.com tel: 01442 821685
kay.wayman@tringpark.com tel: 07544 937917 julia.fairey@tringpark.com tel. 01442 821675

The nominated child protection and Prevent governor is Alice Cave.

Contact details: email: alice.cave@tringpark.com

The Principal is Stefan Anderson.

Contact details: email: principal@tringpark.com tel: 01442 821681

The DSP

The designated safeguarding lead at Tring Park School is referred to as the designated senior person. The DSP will:

- have the status and authority within the school to carry out the duties of the post, including committing resources held in a dedicated safeguarding budget and supporting and directing other staff;
- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases, in conjunction with the Principal, where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.
- act as a point of contact with the three safeguarding partners;
- liaise with the Principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, the E-Safety Officer, the Head of Learning Support and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

Training

The DSP (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSP should undertake Prevent awareness training. Training should provide a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with the Prevent duty requirements and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

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

Raise Awareness

The DSP should:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and

- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school and their staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Child protection file

- Where children leave the school or college (including for in-year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
- In addition to the child protection file, the DSP should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

- During term time the DSP (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSP (or deputy) would be expected to be available in person, it is a matter for the individual schools and colleges, working with the DSP, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.
- It is a matter for the school and the DSP to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

The deputy designated persons (DDSPs) are appropriately trained to the same standard as the DSP. They work in conjunction with the DSP and, in his absence, provide cover and carry out all functions necessary to ensure the ongoing safety and protection of pupils. However, the ultimate lead responsibility for safeguarding and child protection remains with the DSP.

The governing body has a senior board level lead to take leadership responsibility for the school’s safeguarding arrangements. It nominates a member (normally the chairman) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Principal. Alice Cave is the governor designated to take a lead in relation to responsibility for the school’s safeguarding arrangements, but these remain the responsibility of the governing body as a whole. In the absence of the safeguarding governor, the Chair of governors will assume this role. They include ensuring that the school’s safeguarding, recruitment and managing allegations procedures are in accordance with the LSP and national guidance. The governors approve amendments to child protection arrangements in light of changing regulations or recommended best practice. Governors regularly receive training as required under the Education Act 2002 in line with the roles and responsibilities they hold. The governors ensure that the school:

- Appoints a DSP for child protection who is a member of the senior leadership team, who will take lead responsibility for safeguarding and child protection, and who has

undertaken training as detailed above. The DSP's role should be explicit in the role holder's job description and governors will ensure that the DSP carries out all the duties listed above;

- Has appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This includes an effective child protection policy and a staff code of conduct (behaviour policy) that are consistent with LSP and statutory requirements, reviewed annually and made available publicly on the school's website or by other means. They are provided to all staff on induction, along with Part One, Part 5 and Annex A of KCSIE, and information regarding the role of the DSP. Staff also receive the school's Whistleblowing policy, Behaviour policy, Online Safety IT and User Agreement policy as well as the school's safeguarding response to those children who go missing from education. The school takes a risk-based approach to the level of information that is provided to temporary staff and volunteers.
- Has safeguarding arrangements that take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the LSP and in line with Working Together. This includes contributing to inter-agency working through effective implementation of the child protection policy and procedures and effective communication and good cooperation with local agencies;
- Has mechanisms in place to enable staff and volunteers to understand their responsibilities for safeguarding pupils. This includes a comprehensive training and induction programme including how to manage a report of child-on-child sexual violence and sexual harassment, conversations with staff in departments and regular updates. All staff undergo safeguarding and child protection training at induction and training is regularly updated and in line with LSP advice. In addition, all staff receive regular safeguarding and child protection updates;
- Provides opportunities for staff to contribute to and shape safeguarding arrangements and child protection policy;
- Has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online without 'over blocking' and overly restricting children;
- Has procedures for dealing with allegations of abuse made against volunteers and all members of staff, including the Principal, as set out in part four of KCSIE. If a person in regulated activity is dismissed or removed due to safeguarding concerns, or would have been had they not resigned, a referral will be made to the DBS immediately; in addition, a referral will be made to other regulatory bodies such as the TRA, HCPC, NMC;
- Has procedures to minimise the risk of peer on peer abuse between children and that the child protection policy sets out how such allegations will be investigated and dealt with;
- Takes into account the child's wishes and feelings when determining what action to take and what services to provide where there is a safeguarding concern;
- Follows safer recruitment procedures that include statutory checks on staff suitability to work with children, and takes proportionate decisions on whether to ask for any checks beyond what is required. Details of safer recruitment procedures for all staff and volunteers are available in the school's Safer Recruitment policy;
- Provides a coordinated offer of early help when additional needs of children are identified, and that the child protection policy recognises that additional barriers can exist when recognising abuse and neglect in children with special educational needs and disabilities;
- Ensures that appropriate staff have the information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They should have information about care arrangements and the level of authority delegated to the carer. The DSP should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child;
- Teaches pupils about safeguarding, including online safety, through the curriculum and PSHE. Particular attention is given to school practices to help children to adjust their behaviours in order to reduce risks, including the safe use of electronic equipment and access to the internet;
- Has appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

- Considers the DSP's annual safeguarding report to governors and works with the DSP to conduct a review of the school's child protection policies and procedures, and their implementation;
- Ensures that any deficiencies or weaknesses in child protection arrangements are remedied without delay.

It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Principal:

- ensures that the child protection policy and procedures are implemented and followed by all staff;
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSP and DDSs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures;
- ensures that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- liaises with the Local Authority Designated Officer where an allegation is made against a member of staff;
- ensures that anyone (whether employed, contracted, a volunteer or a student) who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service as soon as possible and within one month of leaving the school;
- considers whether a referral for unacceptable professional conduct should be made to the Teaching Regulation Authority (TRA) if a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, but the threshold for a DBS referral has not been reached;
- Ensures that the school does not knowingly employ a barred person into regulated activity.

4. Good practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards pupils we need to agree standards of good practice which form a code of conduct for all staff. Full details can be found in the school's Staff Code of Conduct which is provided to new staff upon induction and is available to all staff in the Policies folder on Staff Resources, in the Staff Handbook and from the school office upon request. Some examples of good practice include:

- treating all pupils with respect;
- setting a good example by conducting ourselves appropriately;
- involving pupils in decisions that affect them;
- encouraging positive, respectful and safe behaviour among pupils;
- being a good listener;
- being alert to changes in pupils' behaviour and to signs of abuse and neglect;
- recognising that challenging behaviour may be an indicator of abuse;
- reading and understanding the school's safeguarding policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact and information-sharing;
- asking the pupil's permission before initiating physical contact, such as assisting with dressing, physical support in vocational lessons or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between pupils, including online, and avoiding the use of sexualised or derogatory language;
- ensuring that staff/pupil relationships are professional at all times;

- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse;
- applying the use of reasonable force only as a last resort and in compliance with school and LSP procedures. Isolation is not an appropriate form of restraint – locking pupils in rooms for any reason (including pupil or staff safety) is potentially illegal;
- referring all concerns about a pupil's safety and welfare to the DSP, or, if necessary directly to police or children's social care;
- following the school's rules regarding communication with pupils and use of social media and online networking, to ensure that these are professional at all times and in keeping with the school's policy on the acceptable use of technologies;
- being familiar with the school's Whistleblowing policy, which is available in the Staff Handbook and in the Policies folder on staff resources, and of the importance of reporting any concerns about a safeguarding or welfare matter.

5. Abuse of trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. In addition, staff should understand that, under section 16 of the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent. Where a pupil is over the age of 18, because of the position of trust that a member of staff is in, this would be considered to be gross misconduct even if it is not a criminal offence.

6. When to be concerned

If staff have any concerns about a child's welfare, they should act on them immediately. They should follow this policy and speak to the DSP or DDSP. The DSP and DDSPs are most likely to have a complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns.

Any staff member should be able to make a safeguarding referral to Children's Services if necessary.

All staff should be aware of the process for making referrals to Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm from abuse or neglect) that may follow a referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Options will then include:

- managing any support for the child internally via the school's own pastoral support processes;
- an early help assessment;
- a referral for statutory services, for example because the child might be in need, is in need, or is suffering or likely to suffer significant harm from abuse or neglect.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSP team, should consider the context within which such incidents and/or behaviours occur and, in particular, whether children are at risk of abuse or exploitation in situations outside their families.

This can include, but is not limited to, sexual exploitation, criminal exploitation, and serious youth violence. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. It is important to provide as much information as possible about this when making a referral so that any assessment can consider all the available evidence and the full context of any abuse. Further information is available on www.contextualsafeguarding.org.uk.

7. Children who may be particularly vulnerable

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled, have special educational needs or other mental health issues
- looked after or previously looked after children
- young carers
- Missing from education
- living in a domestic abuse situation
- affected by parental substance misuse
- asylum seekers
- living away from home
- showing signs of being drawn in to anti-social or criminal behaviour, including being involved with gangs
- vulnerable to being bullied or cyberbullied, or engaging in bullying or cyberbullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- have a family member in prison;
- involved in the court system, either as victims, witnesses or perpetrators of a crime, or through involvement with the family courts;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- involved directly or indirectly in sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM) or any form of honour based violence, forced marriage or radicalisation
- At risk of modern slavery, trafficking or exploitation.

This list provides examples of particularly vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

8. Children missing from education

As underlined in KCSIE, a child going missing from education is a potential indicator of abuse and neglect, including possible sexual abuse, sexual exploitation, radicalisation or involvement in serious violence. The DSP, in conjunction with the Principal and the Attendance Officer, will monitor unauthorised absence, particularly where children go missing on repeated occasions

and/or are missing for periods during the school day. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

The school's Admissions Policy details the school's duties regarding notifying local authorities about deletions and additions to the School Roll when children leave or join the school. It also details the school's duties regarding the Attendance Register and the information that it must record there. The Absence, Attendance and Missing Pupil Policy and Procedures explains the steps the school will take if a pupil is missing.

It is important that all staff help the school to identify and respond to any children who go missing, particularly on repeat occasions. If a member of staff thinks that a pupil might be at risk of going missing from education, this should be reported immediately to the DSP, who will report this to the HSCP. The same procedure applies if a pupil does not turn up repeatedly. For this reason, the school makes every effort to obtain at least two emergency numbers for pupils.

9. Helping children to keep themselves safe

The school's core values include nurturing resilience and this ethos provides a strong foundation from which our children learn how to keep themselves safe. Added to this is the ethos of building a growth mindset philosophy into all lessons. Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education lessons and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with staff work out how those risks might be overcome. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about e-safety and tackling bullying procedures. The school's e-safety officer is in regular communication with parents and works with pupils both individually and in lessons to teach them how to stay safe online. The school continually promotes an ethos of respect for children, and pupils are encouraged to speak to a member of staff in confidence about any worries they have.

The school encourages a culture of open and effective communication between staff and pupils, as well as comprehensive pastoral support structures to help support its pupils. All pupils know there are adults to whom they can turn if they are worried including houseparents, personal tutors, academic mentors, the medical centre, the school counsellors and independent listener. All pastoral noticeboards display information and advice about this.

10. Support for those involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support pupils, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person, usually a member of the DSP team, who will keep all parties informed and be the central point of contact;
- where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest;
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures;

- cooperating fully with relevant statutory agencies.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any type of abuse including sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Cases are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Decisions will be made on a case-by-case basis, with the DSP (or a deputy) taking a leading role, using their professional judgement and being supported by other agencies, such as children's social care and the police as required.

11. Complaints procedure

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by senior staff, the Principal and governors. The school's Complaints Policy is available to all on the school's website and a hard copy will be provided upon request. Complaints from staff are dealt with under the school's disciplinary and grievance procedures.

12. Whistleblowing if you have concerns about a colleague

Staff who are concerned about the robustness of the school's safeguarding procedures or the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's Whistleblowing Policy is available to all staff in the Policies folder in staff resources and in the Staff Handbook. It enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. We all have a statutory responsibility to speak up about any safeguarding and welfare concerns.

13. Allegations against staff

When an allegation is made against a member of staff, set procedures must be followed. This applies to members of staff, supply staff and volunteers who are currently working at the school regardless of whether the school is where the alleged abuse took place. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation.

The school must consider whether a person poses a risk of harm if they continue to work in regular or close contact with children where that person has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates he or she may not be suitable to work with children.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. If a

houseparent or other member of staff who lives in a boarding area is suspended then the Pastoral Manager will organise suitable cover for that house and the School will make arrangements for the member of staff to be accommodated elsewhere.

If you have concerns about, or there is an allegation against, a member of staff, the DSP or a volunteer, the Principal should be informed immediately or, in his absence, the Chair of governors, who will inform the Local Authority Designated Officer (LADO). If there is an allegation against the Principal then the Chair of the Governors should be told and refer on to the LADO without informing the Principal first. Staff may consider discussing any concerns with the DSP and can also make any referral via him. Staff may also report their concerns directly to police or children's social care if they believe direct reporting is necessary to secure action. If the allegation is made against a volunteer or any other person not directly employed by the School, the investigation by the police or LADO must involve the organisation or employment agency. Whilst Tring Park is not the employer of supply teachers, the school should ensure any allegations are dealt with properly. This should include liaising with the LADO to determine a suitable outcome and discussing appropriate action with the supply teacher's employment agency. When using an agency, the school should inform the agency of the process for managing allegations, which should include inviting the agency's HR manager to meetings and keeping them up to date with information about its policies.

If it is decided that the allegation requires a child protection strategy meeting or joint evaluation meeting, this will take place in accordance with section 4.1 of the Hertfordshire Safeguarding Children Partnership Inter-agency Child Protection and Safeguarding Children Procedures. If it is decided it does not require a child protection strategy meeting or joint evaluation meeting, the LADO will provide the school with advice and support on how the allegations should be managed.

The School will not conduct its own investigation into an allegation of abuse against a teacher or other member of staff / volunteer without prior consultation with, and guidance from, the LADO. Advice will be sought from the LADO, or in the most serious cases, the police, within one working day and a risk assessment will be undertaken in conjunction with the relevant agencies as to whether a member of staff can continue to work in school during an investigation. Discussions will be recorded in writing and communication with both the individual and parents of the child or children agreed. The school recognises that the quick resolution of that allegation must be a clear priority to the benefit of all concerned and all unnecessary delays should be eradicated. In borderline cases discussions with the LADO can be held informally without naming the school or individual in order to determine the best course of action.

The school will promptly report to the DBS any person (whether employed, contracted, a volunteer or a student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teaching, or volunteering. 'Settlement agreements' cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation. A referral will be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. When an allegation is made, an investigation should be carried out to gather enough evidence to establish it has no foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on GOV.UK.

In cases of professional misconduct, the Principal will make a referral to the Teaching Regulation Authority (TRA) if a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, but the threshold for a DBS referral has not been reached. Similarly, a referral will be made to other regulatory bodies such as the Health and Care Professions Council (HCPC), Nursing & Midwifery Council (NMC) where relevant.

The full procedures for dealing with allegations against staff can be found in Part Four of KCSIE.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

14. Staff training

It is important that all staff, including the Principal and volunteers in regulated activity, have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. All new staff and governors receive appropriate safeguarding training. This training is in line with advice from HSCP and includes Prevent and online safety. At their induction, they receive copies of the following school policies: Safeguarding and Child Protection, Staff Code of Conduct, Behaviour, Whistleblowing, Online Safety, IT and Acceptable Use. Staff and regular volunteers also receive Part One, Part 5 and Annex A of KCSIE, an explanation of the school's reporting and recording arrangements and the contact details and role of the DSP. Governors are asked to read at least part 2 of KCSIE and preferably also parts 3, 4 and 5.

All staff receive regular updates to their training as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This can take the form of emails, e-bulletins and staff bulletins.

Supply staff and other visiting staff will be given the school's Safeguarding Children Quick Reference Guide, which is also available in all staff rooms and at reception.

15. Safer recruitment

Our school endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Part Three of KCSIE together with the LSP and the school's individual procedures. As part of our safer recruitment procedures, all applicants will:

- complete an application form which includes their employment history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of identity and qualifications;
- provide evidence of their right to work in the UK;
- be interviewed;
- be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role, and obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- be checked against the Prohibition Order list as appropriate to their role. This database is maintained by the TRA and is available through TRA Teacher Services;
- be checked, as appropriate to the role, that the applicant is not subject to a direction made by the Secretary of State under Section 128 of the Education and Skills Act 2008 barring them from taking part in the management of an independent school;
- be checked for any teacher restrictions imposed by any overseas authorities;
- have their mental and physical fitness to carry out their work responsibilities verified;
- undergo any further checks considered to be necessary, for example if the person has lived or worked outside the UK.

At least one member of each recruitment panel will have attended safer recruitment training. The school will obtain written confirmation from supply agencies that agency staff have been appropriately checked. The school maintains a single central record of recruitment checks

undertaken.

Volunteers and visiting guest speakers

Volunteers, including governors, will undergo checks commensurate with their work in the school and contact with pupils. Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance. Visiting guest speakers, whether invited by staff or by pupils, are checked to ensure that they are suitable and are appropriately supervised.

Contractors

The school checks the identity of all contractors working on site and requests DBS checks where appropriate.

Full details of all of the school's safer recruitment procedures can be found in the Safer Recruitment Policy. This policy is available to all staff in the Policies folder on staff resources, in the staff handbook and from the school office upon request.

16. Site security

Visitors to the school, including contractors, must sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe. The Principal will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

17. Extended school and off-site arrangements

Where extended school activities are provided by and managed by the school, our own safeguarding policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures. When our pupils attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

18. Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have safeguards in place. To protect pupils we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- seek parental consent;
- use only the pupil's first name with an image;
- ensure pupils are appropriately dressed;
- encourage pupils to tell us if they are worried about any photographs taken of them.

19. e-safety and cyberbullying

Our pupils increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use social media to harm children. It is the school's aim to protect and educate the whole school in its use of technology and establish mechanisms to identify, intervene and escalate any incident where appropriate. Further advice is available in the government guidance 'Teaching online safety in school'.

There are three broad areas of risk posed by the internet and technology to children:

- Content, or being exposed to harmful material online;
- Contact, or being subjected to harmful interaction with others online;
- Conduct, or personal online behaviour that increases the risk of, or causes, harm.

The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The school's Online Safety, IT and Acceptable Use Policy explains how we try to keep pupils safe in school. This policy covers the use of all technology, including mobile technology, in the school. The school endeavours to do all it reasonably can to protect pupils from potentially harmful and inappropriate online material, without over blocking access to the internet, by using appropriate filters and monitoring systems. All web based traffic from school networks, either wired or wireless, passes through a monitoring and filtering system that gives age appropriate access. Any website access that is flagged or blocked is reviewed, logged and passed on either to the e-safety officer or the DSP as appropriate. This system is regularly updated and the list of blocked websites is constantly updated by the company providing the service.

Cyberbullying by pupils via texts and emails will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures as described in our Anti-Bullying Policy. Online safety is considered as part of both safeguarding and anti-bullying arrangements.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are expected to adhere to the guidelines set out in the Online safety, IT and Acceptable Use Policy for Pupils. Some pupils will undoubtedly be 'chatting' on mobiles or social networking sites at home and parents are encouraged to consider measures to keep their children safe when using social media at home. Staff also receive advice regarding the use of social networking and electronic communication with pupils and are expected to adhere to the guidelines as described in the Staff Code of Conduct, the Social Media Policy and the Online Safety, IT and Acceptable Use Policy for Staff.

Sexting

Sexting is difficult to define because it is a broad term that means different things to different people. To most professionals, sexting is the sending or posting of sexually suggestive images, including nude or semi-nude photographs, via mobile phones or over the internet. However, many young people interpret sexting as the writing and sharing of explicit messages with people they know. Sharing photos and videos online is part of daily life for many people, enabling them to share experiences, connect with friends and record their lives. However, creating and sharing sexual photos and videos of under-18s is illegal. In 2016, The UK Council for Child Internet Safety (UKCCIS) published 'Sexting in schools and colleges: responding to incidents and safeguarding young people' and the school has regard to this advice in formulating its procedures for dealing with any incidents of sexting.

All incidents involving sexting, or youth produced sexual imagery, should be referred to the DSP as soon as possible. If a child discloses an incident to a member of staff, the disclosure should be handled in accordance with staff training and as outlined in section 20 of this policy. The DSP will hold an initial review meeting with appropriate staff and there will be subsequent interviews with those involved if appropriate. Parents should be informed at an early stage and involved in the process unless there is good reason to believe that to do so would put the young person at risk of harm.

If at any point in the process there is a concern that a young person has been harmed or is at risk of harm, a referral will be made to children's social services or the police immediately. An immediate referral to police and/or social care should be made if:

- The incident involves an adult;
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special needs);
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts and any pupil in the imagery is under 13;
- There is reason to believe a young person may be at immediate risk of harm owing to the sharing of the imagery, for example through self-harm or suicide.

If a young person has shared imagery consensually, such as when in a romantic relationship or as a joke and there is no intended malice, it is usually appropriate for the school to manage the incident directly so long as the DSP has enough information to assess the risks to pupils involved. It is necessary under these circumstances that the risks can be managed within the school's pastoral support and disciplinary framework. A decision to manage the situation internally should be taken by the DSP in conjunction with the Principal and other members of staff as appropriate. Any incidents with aggravating factors such as a young person sharing someone else's imagery without consent and with malicious intent should generally be referred to police and/or children's social care. If there is any doubt about whether to involve other agencies, a referral should be made to the police.

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, responses to incidents should be based on what the DSP has been told about the content of the imagery. If a decision is made to view the imagery, the DSP would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from the young people involved;
- is necessary to report the image to a website, app or suitable reporting agency;
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

Under such circumstances, the DSP will first discuss the decision with the Principal and ensure that the viewing is undertaken by a member of the DSP team with another member of staff present, following the procedures outlined in the UKCCIS advice as well as the DfE advice 'Searching, Screening and Confiscation'. This advice also highlights that schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery in accordance with the Education Act 2011. If the school has decided that other agencies do not need to be involved, consideration should be given to deleting the imagery from devices and online services to limit any further sharing of the imagery. It is recommended that schools should not search through devices and delete imagery unless there is good and clear reason to do so. It is recommended that in most cases the young person involved is asked to delete the imagery and to confirm that they have deleted it. It is important to remind young people that possession of youth produced sexual imagery is illegal and that if it is later discovered that they did not delete the imagery they are committing a criminal offence and the police may become involved.

If a device needs to be seized and passed on to the police, the device should be confiscated and the police called. The device should be turned off and locked away safely until the police are able to come and retrieve it.

All incidents and decisions taken relating to youth produced sexual imagery must be recorded in line with the school's safeguarding procedures.

At Tring Park, young people learn about youth produced sexual imagery and the dangers associated with it as part of the school's PSHE programme, IT lessons and through the work of our E-safety Officer. The aim is to explain it and its consequences as well as to provide young people with the strategies and skills to manage both the receipt of such images and any requests or pressure to provide or forward such images.

20. Child protection procedures

Safeguarding and promoting the welfare of children is everyone's responsibility and everyone who comes into contact with children, their families and their carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, staff should make sure their approach is child-centred and that they consider, at all times, what is in the child's best interests.

Research suggests that around 20 per cent of children will suffer some form of abuse at some point, and disabled children are three times more likely to be abused. Due to their day-to-day contact with pupils, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The school will act on identified concerns and provide early help to prevent concerns from escalating.

Recognising abuse

All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family, in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

Physical abuse

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

Emotional abuse

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

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

Sexual abuse

Sexual abuse, including Sexual Violence and Sexual Harassment, involves forcing or enticing a child (can also include peer to peer) to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (Sexual Violence defined under the Sexual Offences Act 2003 for example as 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Sexual abuse can be committed by men, women or other children. The sexual abuse of children by other children is a specific safeguarding issue in education. This is further detailed in the section on peer on peer abuse.

Whilst not intended to be an exhaustive list, 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 and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence;
- non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

Neglect

Neglect is 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); ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child’s wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying is also a form of peer on peer abuse, which is discussed later in this policy.

All incidences of bullying, including cyberbullying and prejudice-based bullying, should be reported and will be managed through our anti-bullying procedures. All pupils and parents receive a copy of the Anti-Bullying Policy on joining the school and the subject of bullying is addressed at regular intervals in PSHE education, assemblies and with external speakers. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Principal and the DSP will consider implementing child protection procedures. If there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm then child protection procedures will be followed and the abuse referred to local agencies.

Indicators of abuse

All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Physical signs define some types of abuse: for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated senior person.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about, drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSP to decide how to proceed.

It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Early help if you have a concern about a pupil's welfare

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. All staff should be aware of the **early help process**, and understand their role in identifying emerging problems, and sharing information with other professionals to support early identification and assessment of a child's needs. HSCP's early help process is called Families First.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSP any ongoing or escalating concerns so that consideration can be given to a referral to Children's Services (Safeguarding and Specialist Services) if the child's situation doesn't appear to be improving. In some cases, it might mean acting as the lead professional, with the support of the DSP, in undertaking an early help assessment. Staff also may be required to support other agencies and professionals in early help assessment.

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 and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- 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;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". There will be occasions when staff may suspect that a pupil may be at risk, but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

If staff members have any concerns about a child they should, where possible, have a conversation with the DSP to agree a course of action, and also make a written record of their concern using the software package **MyConcern** to record these early concerns. This confidential system of recording child protection concerns is reviewed regularly by the DSP team so that concerning patterns of behaviour can be spotted. Staff, volunteers or visiting professionals that do not have access to MyConcern should make a written record of the incident, which is signed and dated, and pass to the designated staff without delay.

In line with LSP procedures, if it is unclear whether a borderline case meets a referral threshold, contact will be made with **CPSLO Consultation Service** on 01992 555980.

It is important that the pupil receives the right help at the right time to address risks and prevent issues from escalating. Catching early signs of a problem and reporting it can help lead to inter-agency assessment, including use of HSCP's Families First Assessment and Continuum of Need to achieve the right level of support for that pupil. It is important to act on and refer the early signs of abuse and neglect without delay. At all times, the views of the child should be listened to, information should be shared quickly and inaction should be challenged. If at any stage the situation changes or does not improve, the concern should be reassessed.

If a pupil discloses to you

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen, if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than

they would have otherwise.

During their conversations with the pupil staff will:

- allow them to speak freely;
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’;
- not be afraid of silences – staff must remember how hard this must be for the pupil;
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil’s mother think about all this;
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on, outlining who this will be;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong;
- tell the pupil what will happen next. The pupil may agree to go to see the DSP. Otherwise let them know that someone will come to see them before the end of the day;
- report verbally to the DSP/DDSP to agree a course of action, although any staff member can make a referral to children’s social care. In the absence of the DSP and the DDSPs, the report should be made directly to the Principal;
- write up their conversation as soon as possible and within 24 hours using MyConcern. Keep any original notes, however rough, and even if written on the back of something else. Identify the pupil, giving full name and date of birth (if possible). It is important to sign and date any paper records. Make a note of the time and where the information was shared. If possible, place the event in context, what preceded the disclosure and what followed. Keeping clear records is of the utmost importance;
- seek support if they feel distressed.

Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSP will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care. Informing parents must not apply when a child is at risk of harm, or may be at risk of harm. The school does not require the consent of parents to refer allegations to the LADO.

Wherever possible, the school will hold more than one emergency contact number for pupils.

Referral to children’s social care

In accordance with LSP procedures, the DSP will make a referral to children’s social care as soon as possible and within 24 hours of the initial disclosure if it is believed that a pupil is suffering, or is at risk of suffering, significant harm. The professional agency must confirm this referral, in writing, within 48 hours. Referrals can be made by calling **0300 123 4043**. Written referrals should be addressed to **Client Services, PO Box 153, Stevenage, Hertfordshire SG1 2GH, Fax: 01438 737402**. The DSP will ask to be informed of the timing of strategy discussions between the statutory agencies which will decide whether and how to investigate. Throughout the process, the child protection arrangements will be kept under review so that any deficiencies or weaknesses can be remedied without delay.

If a child is in immediate danger or is at risk of harm

If a child is in immediate danger or is at risk of harm a referral should be made to children’s social care and/or the police immediately. Anyone can make a referral if necessary. Staff should follow the reporting procedures in this policy if possible but they may also share information

directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the DSP, the DDSs, the Principal and the Chair of governors are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety;
- for any other reason they make a judgement that direct referral is in the best interests of the child.

Where referrals are not made by the DSP, the DSP should be informed as soon as possible that a referral has been made. If staff have concerns about how child protection concerns are being handled, either by the school or another organisation, they can contact the NSPCC Whistleblowing Advice Line for free advice and support on 0800 028 0285 or help@nspcc.org.uk.

Record keeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSP.

Peer on Peer Abuse: children with harmful behaviour

All staff should be aware that children can abuse other children or young people. This is often referred to as peer on peer abuse. It is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence under the Voyeurism (Offences) Act 2019 and anyone, of any gender, can be a victim.
- sexting (also known as youth produced sexual imagery);
- initiation/hazing type violence and rituals.

Staff will be aware of the harm caused by bullying and will follow the school's Anti-Bullying and Behaviour policies where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures and these cases must be referred to the appropriate external agencies. All allegations of peer on peer abuse must be recorded, investigated and dealt with appropriately.

Child on child sexual violence and sexual harassment is a specific safeguarding issue in education as stated in KCSIE (staff should refer to Part 5 of KCSIE for further information). All staff should be aware that children are capable of abusing their peers. It is more likely that girls will be victims and boys perpetrators, but all peer on peer abuse is unacceptable and will be taken seriously. Abuse is abuse, whatever the age of the person committing it, and this must never be tolerated or passed off as "banter", "part of growing up" or "just having a laugh".

Research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18. The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the school's child protection procedures will be followed for both victim and perpetrator. Staff who become concerned that a child might be suffering any form of abuse at the hands of another child should follow the school's child protection procedures and speak to the DSP as soon as possible. The school will cooperate with relevant agencies, the counsellor and the medical team as appropriate to ensure that victims, perpetrators and any other child affected by peer on peer abuse will be supported. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual

harassment, nor made to feel ashamed. If staff have a concern about a child or a child makes a report to them, they should follow the normal referral process.

In order to minimise the risk of peer on peer abuse, the school provides a developmentally appropriate PSHE curriculum, relationships education and relationships and sex education, which develop an understanding of acceptable behaviour, healthy relationships and keeping themselves safe. The school also makes clear that pupils can raise concerns with staff and that they will be listened to, believed and valued.

Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved in, serious 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, 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. All staff should be aware of the associated risks and report any concerns to the DSP team. Further information is available in the Home Office's guidance 'Preventing youth violence and gang involvement' and 'Criminal exploitation of children and vulnerable adults: county lines'.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. 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. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a single occurrence or a series of incidents over time. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual. It should be noted that exploitation as well as being physical can be facilitated and/or take place online. CSE does not always involve physical contact; it can also occur through the use of technology. More information and indicators of CSE and CCE are available in Annex A of KCSIE.

A significant number of children who are victims of CSE or CCE go missing from home, care or education at some point. CSE and CCE are serious crimes and can have a long-lasting adverse impact on a child's physical and emotional health. They can also be linked to child trafficking. Any concerns that a child might be involved in CSE or CCE must be reported immediately to the DSP.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas using dedicated mobile phone lines or other form of "deal line". Exploiting children and vulnerable adults through coercion, intimidation, violence (including sexual violence) and weapons to move or store drugs and money is an integral part of the county lines model. Gangs target and recruit children into county lines in schools and other locations. They can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnapping.

One of the possible indicators of involvement in county lines is missing episodes from home and school, where the victim may have been trafficked for the purpose of transporting drugs. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of local service providers who offer support to victims of county lines exploitation.

'Honour based' violence (HBV)

So called honour based violence encompasses crimes which have been committed to protect or defend the honour of the family and/or community. This includes FGM, forced marriage and other 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. All forms of HBV are abuse, regardless of the motivation, and should be handled and escalated as such. If in any doubt, speak with the DSP. Where there is a concern that HBV has taken, or might take, place, local safeguarding procedures will be followed, using existing national and local procedures for multi-agency liaison with police and children's social care.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM is a deeply rooted tradition, widely practised mainly amongst specific ethnic populations in Africa and parts of the Middle East and Asia. FGM has also been documented in communities in Iraq, Israel, Oman, the United Arab Emirates, the Occupied Palestinian Territories, India, Indonesia, Malaysia and Pakistan. It serves as a complex form of social control of women's sexual and reproductive rights. Although the immediate location and demographic profile of Tring Park School makes it less likely for this to be an issue here, all areas, local authorities and professionals must be aware of, and actively prevent and tackle, FGM. As a boarding school with international students, it is important that all staff recognise this.

All teaching staff have a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It is rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this reporting duty applies.

Unless there is good reason not to, staff should still consider and discuss such a case with the DSP and involve children's social care as appropriate, even where they have a statutory duty to notify the police directly.

Safeguarding girls at risk of harm of FGM poses specific challenges because the families involved may give no other cause for concern. However, there still remains a duty to act to safeguard girls at risk. FGM is an illegal act performed on a female, regardless of her age. Anyone who has concerns that a girl may be *at risk of* or *may have* undergone FGM (as opposed to *discovering* that she has undergone) should report this following the same procedures as for any other safeguarding concern and the DSP will make a referral to the local authority children's social care; anybody can make a referral if necessary.

Forced marriage

Forced marriage is a crime in England and Wales. Staff should be aware that young people from some cultures may be at risk of forced marriage, and that physical, emotional and psychological threats are often used to coerce a young person into an arranged marriage. Schools can play an important role in safeguarding children from forced marriage. Links with further details can be found in Annex A of KCSIE.

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. Although only trained professionals should attempt to make a diagnosis of a mental health problem, staff 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, neglect or other potentially traumatic adverse childhood experiences, this can have a lasting impact on them. It is key that staff are aware of how these children's experiences can impact upon their mental health, behaviour and education. The government guidance 'Mental Health and Behaviour in Schools' and Public Health England offer a range of advice and resources to help staff to promote positive health, wellbeing and resilience among young people. Further details about how the school supports young people with mental health issues are available in the school's Positive Mental Health policy.

A number of staff at Tring Park hold Mental Health First Aid qualifications and are well placed to identify pupils who might have mental health problems. If any staff have a mental health concern

about a child, they should speak to the medical centre so that an assessment and appropriate support can be arranged. If that concern is also a safeguarding concern, immediate action should be taken by following the child protection policy and speaking to the DSP team.

Preventing radicalisation and extremism

Children are vulnerable to extremist ideology and radicalisation. All schools have a duty to have due regard to the need to prevent people from being drawn into terrorism, known as the Prevent duty. In order to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of our armed forces.
- **Radicalisation** is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Islamic extremism is the most widely publicised form and all schools should also remain alert to the risk of radicalisation into white supremacy extremism.
- **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.

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties, and is similar in nature to protecting children from other harms, whether they come from within the family and friends or are the product of outside settings and influences such as social media or the internet. Staff should be alert to changes in children's behaviour, which could indicate 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 might include the DSP team, who are aware of local procedures for making a Prevent referral. See Appendix A for a list of indicators that someone might be at risk. The school conducts an annual Prevent Duty risk assessment, assesses the risk of children being drawn into terrorism and identifies who may be at risk of radicalisation.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014). This advice is available on the following link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMS_C_Guidance_Maintained_Schools.pdf

It is important that procedures relating to the Prevent duty work with local partnership arrangements and take into account the LSP's policies and procedures. Engaging with parents or the child's family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and help them to find appropriate support mechanisms. In line with the school's safeguarding policies and procedures, any concerns relating to possible radicalisation should be discussed with a child's parents unless there is a reason to believe that to do so would put the child at risk.

At Tring Park School, the DSP is also the single point of contact (SPoC) for Prevent concerns. If a member of staff has a concern about a particular pupil they should follow the school's normal safeguarding procedures, including discussing with the DSP/DDSPs and, where deemed necessary, with children's social care. The Hertfordshire police can be contacted on the non-emergency number (101) for advice about any concerns as well as to provide support and advice. The DfE has a dedicated telephone helpline (020 7340 7264) and email extremism@education.gsi.gov.uk to enable governors and staff to raise a concern relating to extremism directly. However, this is not an emergency helpline.

Channel is an early intervention multi-agency process designed to safeguard vulnerable people

from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. A referral to Channel can be made through the LSP website. The DSP should be aware of local procedures for making a Channel referral.

If there is any concern that a child is at immediate risk of harm or that there is a risk of a security incident, the normal emergency procedures should be followed. Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

Full details of local procedures are available on the following link to HSCP's website: <http://www.thegrid.org.uk/leadership/safeguarding/anti-radicalisation.shtml> and the following legislation and guidance is available to all staff on S:\Child Protection information\Legislation and guidance\Prevent information:

- Prevent Duty Guidance: for England and Wales
- The Prevent Duty: Departmental advice for schools and childminders
- The use of social media for online radicalisation

Domestic Abuse and Operation Encompass

As part of the school's Local Safeguarding Procedures, Tring Park is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse. Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. This abuse can encompass, but is not limited to, psychological, physical, sexual financial and emotional. All children can witness and be adversely affected by domestic abuse between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact.

Operation Encompass ensures that the police will share information about Domestic Abuse incidents with the school prior to the start of the next school day when they have been called to a domestic incident. The DSP and DDSPs have received Operation Encompass training and parents have been informed that Tring Park is an Operation Encompass school. Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All school staff and Governors have received training on Operation Encompass, the prevalence of Domestic Abuse, the impact of this abuse on children and how to support pupils following an Operation Encompass notification. The school is aware that it must do nothing that puts a child or non-abusing adult at risk. The DSP or Safeguarding governor will report on Operation Encompass as part of termly safeguarding reports to Governors. All information is anonymised for these reports.

21. Special Circumstances

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker owing to safeguarding or welfare needs such as abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave the child vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share with the DSP the fact that a child has a social worker so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. For example, responding to unauthorised absence or missing education where there are known safeguarding risks, and promoting welfare through the consideration of additional pastoral and/or academic support.

Looked after and previously looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. When the school has such a child in its care, it ensures that appropriate staff have information about a child's looked after status and care arrangements. A designated member of staff, who is

the relevant Head of Key Stage, is appointed to have responsibility for the welfare and progress of a looked-after child and is trained for that role. The designated teacher for that child and the DSP will hold details of the child's social worker and the name and contact details of the local authority's virtual head for children in care. Previously looked after children and care leavers are still potentially vulnerable so should be treated as a high risk category similar to looked after children.

Children with special educational needs and disabilities (SEND)

Additional barriers can exist when recognising abuse and neglect in children with SEND. These can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration. Also, children with SEN and disabilities can be disproportionately impacted by issues such as bullying without outwardly showing any signs. Furthermore, communication barriers can exist and it can be difficult to overcome these barriers. Staff need to be on high alert for any possible signs of abuse or neglect amongst these children and should immediately report any concerns they have to the DSP. Children with SEN can be more prone to peer to group isolation and peer on peer abuse than other children and may need to consider extra pastoral support.

Specialist settings

As a school that offers specialist performing arts training and one-to-one tuition, staff must recognise and follow additional measures that are necessary to safeguard children. Individual lessons must take place only in official school teaching rooms with windows as timetabled and published by that tutor's head of department. Any change of time, location or the scheduling of additional lessons may be made only with the prior approval of the head of department. Staff who teach regularly in one-to-one settings should follow the guidance specific to their subject as set out in their departmental handbook. If staff do not regularly teach on a one-to-one basis but have the need to do so on occasion, this must be logged in advance with the member of staff's head of department. At times, some performing arts lessons involve necessary physical contact between the member of staff and the pupil. All staff must follow the guidelines set out in the Acceptable Contact Policy in any lesson or other situation with a pupil that involves either physical contact or a one-to-one situation.

Boarding Schools

Research has shown that children can be particularly vulnerable in residential settings. As such, the school has regard for, and complies with, the Boarding Schools National Minimum Standards (2015) and is regularly inspected by Independent Schools Inspectorate (ISI) in this regard. All staff should be particularly alert to possible signs of abuse in boarders.

As a boarding school, extra care must be taken over access to the boarding areas of the school. Only pastoral staff and those other staff authorised to work in boarding areas at particular times, such as Housekeeping and Estates Services, are authorised to enter boarding areas. There will be times when other staff need to visit boarding areas. At such times, staff must arrange this in advance with the appropriate houseparent and/or the Pastoral Manager.

Children staying with host families

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or tour. In such circumstances the school follows the guidance in Annex E of KCSIE to ensure that hosting arrangements are as safe as possible. If a homestay within the UK is arranged by the school, a DBS enhanced certificate will be obtained with barred list information. If a homestay takes place abroad, the school will liaise with partner schools abroad to establish a shared understanding of, and agreement to, the arrangements in place for the visit in order to make clear that the arrangements are appropriate and sufficient to safeguard the pupils. Parents will be made aware of the arrangements and it will be made clear to pupils whom they should contact during a homestay should an emergency occur or a situation that makes them feel uncomfortable. Some overseas pupils may reside with host families arranged by their parents during school terms and the school will work with the local authority to check that any such arrangements are safe and suitable.

Allegations of historic child abuse

A number of incidents publicised in the media have demonstrated the possibility of abuse

remaining unreported over a number of years. Should any member of staff receive information directly or indirectly of previously unreported abuse, they should take it seriously and immediately bring it to the attention of the Principal or the DSP. The school will consult the Local Authority Designated Officer in all cases of allegations against former members of staff and act on their advice. Any action taken, including the reporting and investigation of any historic incident disclosed, will take into account the express wishes of the subject/s of the reported abuse and also the legal requirement to refer such allegations to statutory agencies. However, the fundamental principles of the primacy of children's welfare and their protection would apply just as much in these circumstances, and every opportunity should be taken to prevent any future abuse.

Related safeguarding documents, policies and procedures:

Because safeguarding is a priority across all areas of the school, this policy should not be read alone but in conjunction with the documents, policies and procedures listed below. This is not a definitive list as the school is committed to reviewing and extending its safeguarding provision continuously. However, the list encompasses all the areas in which links are clearly made and the safety of pupils actively promoted.

- Safeguarding Children Quick Reference Guide
- Staff handbook
- Pupil handbooks
- Parent handbooks
- Departmental handbooks
- Safer recruitment policy and procedures
- Procedures for managing allegations against staff
- Staff and governor training
- Behaviour policy
- Anti-Bullying policy
- Missing Pupil policy
- Use of Reasonable Force and Physical Restraint policy
- Acceptable Contact policy
- Staff code of conduct
- Record of sanctions and disciplinary procedures
- Information on whom students can turn to if they are worried
- Departmental curricula, PSHE and sex education
- Learning Support and English as an Additional Language policies
- Alcohol, Smoking and Drugs policy
- Medical, First Aid and Self-Harm policies
- Positive Mental Health policy
- Healthy eating
- Health and safety including site and off site security
- Prefect training
- Gap student training
- School risk assessments
- Fire policy
- Supervision and registration procedures
- Admission and attendance registers
- Visitors to the school
- Educational visits
- Equal opportunities
- Parent communication
- Emergency procedures
- Use of photographs and film
- Appropriate posters giving contact numbers for child protection helplines
- Whistleblowing policy
- Complaints policy
- Staff Grievance and Disciplinary procedures

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not

only out of respect for the pupil and staff involved but also to ensure that being released into the public domain does not compromise evidence. However, any fears of sharing information **must not** stand in the way of the need to promote the welfare, and protect the safety, of children. Information sharing is vital in identifying and tackling all forms of abuse and neglect.

Staff should only discuss concerns with the DSP, Principal or chair of governors, depending on who is the subject of the concern (although anyone can make a referral to children's social care). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care. Information should be shared with the three safeguarding partners, other organisations, agencies and practitioners as required. If a child is thought to be at immediate risk then a referral should be made to children's social care and/or the police immediately.

Child protection information will be stored and handled in line with GDPR principles and the Data Protection Act 2018, particularly amendment 85. Information must be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- kept safe and secure;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- Not provided where the serious harm test under the legislation is met, in compliance with the school's obligations under the Data Protection Act 2018 and the GDPR.

The School uses the software **MyConcern** as its means of securely storing child protection records and any other written information can be scanned into **MyConcern**. Sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Child protection information is stored separately from the pupil's school file.

Child protection records are normally exempt from the disclosure provisions of GDPR and the Data Protection Act 2018, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Principal or DSP.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. See also the DfE's statutory guidance 'Information Sharing: Advice for Practitioners [Providing Safeguarding Services to Children, Young People, Parents and Carers](#)' (DfE 2018)

Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. The individual should be informed that the information has been shared, so long as this does not create or increase risk of harm.

Safeguarding / child protection information should not be kept any longer than is necessary. In some circumstances this may be indefinitely, but if this is the case there should be a review

process.

22. Appendix A: Prevent duty: Indicators of those who might be at risk of radicalisation

Vulnerability

- Identity Crisis - Distance from cultural/religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

Access to extremism / extremist influences

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/military training camps/locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/or distribute extremist literature/other media material likely to incite racial/religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

Experiences, Behaviours and Influences

- Has the child/young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/young person come into conflict with family over religious beliefs/lifestyle/dress choices?
- Does the child/young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/young person witnessed or been the perpetrator/victim of racial or religious hate crime or sectarianism?

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/young person employed any methods to disguise their true identity? Has the child/young person used documents or cover to support this?

Social Factors

- Does the child/young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child/young person experience a lack of meaningful employment appropriate to their skills?
- Does the child/young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/young person have any learning difficulties/ mental health support needs?
- Does the child/young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/young person have a history of crime, including episodes in prison?
- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child/young person have insecure, conflicted or absent family relationships?
- Has the child/young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child/young person's life has extremist view or sympathies?

More critical risk factors could include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

23. Appendix B: Contact Details of Outside Agencies

Emergency

If a person is in immediate danger, ring **999** and ask for the Police.

Advice

If you need outside advice on a safeguarding matter regarding a child, the following organisations give confidential advice:

Childline: 0800 1111
 NSPCC: 0808 800 5000
 Kidscape: 0845 1295

Local Safeguarding Partners

Hertfordshire Safeguarding Children Partnership Team
Room 152
Postal Point CH0116
County Hall
Hertford
SG13 3DQ

Tel: 01992 588757

Email: admin.hscp@hertfordshire.gov.uk

If you think you might need to make a referral but you are unsure whether the safeguarding threshold has been reached, the CPSLO Consultation Service provides a consultation line: 01992 555980.

The LADOs are Yvette Morello and Tony Purvis and the LADO team manager is Frazer Smith. Their email is: lado.referral@hertfordshire.gov.uk and a referral can be made to the Customer Service Centre: 0300 123 4043.

Guidance on local procedures for reporting concerns is available on the following LSP website link: http://www.hertssafeguarding.org.uk/adults/reporting_concerns_summary.html

Referrals should be addressed to:

Client Services
PO Box 153
Stevenage
Hertfordshire
SG1 2GH

Fax: 01438 737402

Disclosure and Barring Service

The DBS can be contacted by post, telephone or email:

PO Box 181
Darlington
DL1 9FA

01325 953795

dbsdspatch@db.s.gsi.gov.uk

Prevent Contacts

Non-emergency advice for staff and governors (CHANNEL DfE helpline): 0207 340 7264
counter-extremism@education.gsi.gov.uk

Confidential Anti-Terrorist Hotline: 0800 789 321

LSP website link: <http://www.thegrid.org.uk/leadership/safeguarding/anti-radicalisation.shtml>

NSPCC Whistleblowing Advice Line

If staff have concerns about how child protection concerns are being handled, either by the school or another organisation, they can contact the NSPCC Whistleblowing Advice Line for free advice and support on 0800 028 0285 or help@nspcc.org.uk.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline which can be called free of charge and in confidence, 24 hours a day: 0808 2000 247

Further advice and information is available on their website: www.refuge.org.uk