Safeguarding and Child Protection Policy

Contents:

Reviewed by:

Designated Safeguarding Lead (DSL): Anselm Barker

Date: 1st September 2024

Deputy DSLs: Francesca Joseph, Charlotte Robinson, Benny Simpson, Kay Wayman

Date: 1st September 2024

Principal: Simon Larter-Evans

Date: 1st September 2024

Chair of Governors: Angela Odell

Date: 1st September 2024

Safeguarding Governor: John Clark

Date: 1st September 2024

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 are dedicated to nurturing the wellbeing of all our pupils and recognise our moral and statutory responsibility to safeguard and promote their welfare. We endeavour to provide a safe, nurturing and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation, following 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:
  - Providing help and support to meet the needs of children as soon as problems emerge;
  - protecting children from maltreatment, whether that is within or outside the home, including online;
  - preventing impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care;

- o 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, contract workers 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)
- Information sharing (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 (2022)
- 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 (July 2015, updated April 2021 (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
    - o The Prevent Duty: Departmental advice for schools and childminders (June 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).
- Schools COVID-19 operational guidance (August 2021)
- Non-statutory interim supplement to KCSIE: Safeguarding and remote education during coronavirus (COVID-19)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019, updated September 2021)
- Keeping Children Safe in Education (DfE 2024) All staff who work with children must read Part One of this guidance. Those staff who do not work directly with children must read either Part One or Annex A of this guidance. The school will make an assessment of which guidance is most effective for these staff to safeguard and promote the welfare of children. Staff can find a copy of KCSIE 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 2024) 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 safeguarding lead (DSL) and single point of contact (SPoC) for Prevent is:

Anselm Barker, Deputy Principal. This position was previously known as designated senior person (DSP).

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

The deputy designated safeguarding leads are:

Francesca Joseph, Housemistress. Email: dsl@tringpark.com tel: 07754 600616
Charlotte Robinson, Lead Nurse and Mental Health Lead. Email: dsl@tringpark.com tel: 01442 821675
Benny Simpson, Housemaster. Email: dsl@tringpark.com tel: 07394 564027
Kay Wayman, Senior Housemistress. Email: dsl@tringpark.com tel: 07544 937917

The nominated child protection and Prevent governor is John Clark.

Contact details: email: john.clark@tringpark.com

The Principal is Simon Larter-Evans.

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

The DSL will:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place;
- have the status and authority within the school to carry out the duties of the post, including providing advice and support to other staff on child welfare, safeguarding and child protection matters;
- take part in strategy discussions and inter-agency meetings, and/or support other staff in doing so, and contribute to the assessment of children;

Availability
- During term time the DSL (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, it is a matter for the school, working with the DSL, 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 DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals
The DSL is expected to refer cases:
- of suspected abuse, neglect and exploitation to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;

- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- where a crime may have been committed to the Police as required. *NSPCC – When to call the police* gives guidance on when to call the police and what to expect when working with the police.

<u>Working with others</u>

- act as a source of support, advice and expertise for staff;
- act as a point of contact with the safeguarding partners;
- liaise with the Principal to inform him 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 local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, the e-safety officer, the Head of Learning Support and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
    - o ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for their cohort;
    - o Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

<u>Information sharing and managing the child protection file</u>

- Ensure that child protection files are kept up to date, keeping information confidential and securely stored. Records, including concerns and referrals, should be kept in a separate child protection file for each child and include:
    - o A clear and comprehensive summary of the concern;
    - o Details of how the concern was followed up and resolved;
    - o A note of any action taken, decisions reached and the outcome.
- Ensure the file is only accessed by those who need to see it and where the file or content is shared, this happens in line with information sharing advice as set out in parts one and two of KCSIE;
- Where children leave the school or college (including in-year transfers), ensure their child protection file is transferred to the new school or college as soon as possible, and within five days for an in-year transfer or within the first five days of the start of a new term. 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 DSL should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and help the child thrive in school. For example, information that would allow the new school or college to continue supporting victims of abuse or those who have had a social worker and have that support in place for when the child arrives.

Raising Awareness

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with 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 in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker, are experiencing with teachers and school leadership staff.

Training, knowledge and skills

The DSL (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 DSL should undertake Prevent awareness training. Training should provide a good understanding of their own role, how to identify, understand and respond to the specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners;
- 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 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;
- 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.

Providing support to staff

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

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

Understanding the views of children

It is important that children feel heard and understood. Therefore, the DSL should be supported in developing knowledge and skills to:

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

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in parts one, two and five of KCSIE and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the school and with other schools and colleges on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR);
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

The deputy designated safeguarding leads (DDSLs) are appropriately trained to the same standard as the DSL and the role is explicit in their job description. They work in conjunction with the DSL 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 child protection, as set out above, remains with the DSL. This responsibility should not be delegated.

The governing body should ensure they facilitate a whole school approach to safeguarding which involves everyone in the school, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. They must ensure the school's policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. Systems should operate with the best interests of the child at heart and be well promoted, easily understood and accessible for children to confidently report any form of abuse or neglect knowing their concerns will be taken seriously, their wishes and feelings taken into account, and they can safely express their views and give feedback. Governors should ensure online safety is a running and interrelated theme whilst devising and implementing their whole school approach to safeguarding and related policies and procedures. Online safety training for staff and pupils should be integrated, aligned and considered as part of the whole

school safeguarding approach and wider staff training and curriculum planning.

All governors receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction and this is regularly updated. This is in order to equip them with the knowledge to provide strategic challenge to test and assure themselves that the school's safeguarding policies and procedures are effective. It is the governing body's obligation to ensure that the correct training is undertaken by all governors. This training should cover Part 2 of KCSIE, the school's local arrangements, online safety and the particular risk factors and arrangements in the school.

The governors have a senior board level lead to take leadership responsibility for the school's safeguarding arrangements. John Clark 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 nominate 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. 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:

- They appoint a DSL 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 DSL's role should be explicit in the role holder's job description and governors should read the full DSL job description and fully understand the importance and breadth of the role as set out in annex C of KCSIE. The governors must ensure the DSL has appropriate status and authority within the school to carry out the duty of the post and is given additional time, funding, training, resources and support to carry out the role effectively.
- The school 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 of KCSIE, and information regarding the role of the DSL. 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.
- Safeguarding arrangements 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;
- Mechanisms are 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 (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction and training is regularly updated and in line with LSP advice. In addition, all staff receive regular safeguarding and child protection updates;
- The school provides opportunities for staff to contribute to and shape safeguarding arrangements and child protection policy;
- Whilst considering their responsibility to safeguard and promote the welfare of children

and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks;

- Procedures are in place 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;

- The school has procedures to minimise the risk of child-on-child abuse between children and that the child protection policy sets out how such allegations will be investigated and dealt with;

- The school 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;

- The school 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;

- The school 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, neglect and exploitation in children with special educational needs and disabilities;

- 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 DSL 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;

- The school teaches pupils how to keep themselves safe, including online. Teaching should be tailored to the specific needs and vulnerabilities of individual children, such as those who are victims of abuse, children with SEN or disabilities;

- There are appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

- They consider the DSL's annual safeguarding report to governors and work with the DSL to conduct a review of the school's child protection policies and procedures, and their implementation;

- Any deficiencies or weaknesses in child protection arrangements are remedied without delay;

- Appropriate arrangements are in place to keep children safe if the school hires out its premises to organisations or individuals. If services or activities are provided by a body other than the school it seeks assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place in accordance with DfE guidance 'Keeping children safe in out-of-school settings', and that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children attending any of these services or activities are the school's pupils. Also, that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement. If the school receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the

purposes of running activities, as with any safeguarding allegation, the school will follow its own safeguarding policies and procedures, including informing the LADO;

- Staff have due regard to the relevant data protection principles, which allow them to share and withhold personal information, as provided under UK GDPR and the Data Protection Act 2018, filters and monitoring systems are in place and appropriate levels of security protection procedures are in place.
- The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance 'For Organisations' which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information.

It is important that governing bodies are aware of their obligations under the Human Rights Act 1998, Equality Act 2010, local multi-agency safeguarding arrangements, the Data Protection Act 2018 and the UK GDPR.

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 DSL and DDSLs 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, neglect and exploitation;
- 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 DSL, 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

All staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. School staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. If staff have any concerns about a child's welfare, they should always act in the best interests of the child and they should act on their concerns immediately. They should follow this policy and speak to the DSL or DDSL. The DSL and DDSLs are most likely to have a complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

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;
- undertaking an early help assessment;
- making 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.

Contextual Safeguarding

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible in the referral process. Safeguarding incidents and/or behaviours can be associated with factors inside and outside the school, inside and outside the home, including online, and can occur between children. All staff, but especially the DSL 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. More information is available: 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.

The school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support.

Any child can benefit from early help but staff will be particularly alert to the potential need for early help for a child who:

- is disabled, or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in a Pupil Referral Unit or Alternative Provision (where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's

needs);
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- is at risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage;
- is a privately fostered child.

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 absent from and missing from education

As underlined in KCSIE, children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The school is alert to the fact that unexplainable and/or persistent absences from education are possible indicators of such abuse and identifying persistently absent pupils can help prevent the risk of them becoming a child missing education in the future. The Principal, in conjunction with the DSL and the Attendance Officer, will monitor unauthorised absence, particularly where children are persistently absent or go missing on repeated occasions and/or are missing for periods during the school day to help identify such abuse and also prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Some pupils can leave school for Elective Home Education (EHE). While many home educated children have an overwhelmingly positive learning experience, this is not the case for all and home education can mean some children are less visible to services that are there to keep them safe and supported in line with their needs. Where a parent has expressed the intention to remove a child from school with a view to educating them at home, the school will work with the LA and any other key professionals to coordinate a meeting with parents if possible. Ideally, this would be before a final decision is made to ensure that parents have considered what is in the best interests of the child. This is particularly important where a child has SEN, is vulnerable or has a social worker.

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 are persistently absent or 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 DSL, 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. The school is mindful of DfE guidance 'Working together to improve school

attendance' in working with Hertfordshire children's services where school absence indicates safeguarding concerns.

9. Helping children to keep themselves safe

It is the school's aim to teach pupils how to keep themselves and others safe, including online. 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 parents and pupils both individually and in lessons to teach them how to stay safe online and help them understand what systems are in place in school to filter and monitor online use. 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's role in preventative education aims to prepare pupils for life in modern Britain and create a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school upholds a clear set of values in this regard, upheld and demonstrated throughout all aspects of school life and underpinned by:
- The school's behaviour policy and pastoral system;
- A planned programme of RSE in regularly timetabled lessons and reinforced throughout the whole curriculum;
- Inclusive and age development appropriate programmes covering a range of topics.

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 DSL 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 DSL (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

Allegations that may meet the harms threshold

When an allegation is made against a member of staff, set procedures must be followed. This applies to all those working in or on behalf of the school in a paid or unpaid capacity including members of staff, supply staff, volunteers and contractors, 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.

If the School identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, it should contact children's social care and as

appropriate the police immediately in accordance with the processes set out in part one of KCSIE.

When an allegation is made against a member of staff, the school will consider two aspects: looking after the welfare of the child and investigating and supporting the person who is subject to the allegation. While the welfare of a child is paramount, the school also has a duty of care to its staff and will offer appropriate welfare support when an allegation is being investigated. Information is confidential and should not normally be shared with other staff or with children or parents who are not directly involved in the investigation. While parents of the child/ren involved should be kept informed about the progress of the case, this should only be in relation to their child – no information can be shared regarding the staff member. 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.

Staff 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.

Before contacting the Local Authority Designated Officer (LADO), the school will conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

If you have concerns about, or there is an allegation against, a member of staff, the DSL or a volunteer, the Principal should be informed immediately or, in his absence, the Chair of governors, who will inform the LADO. If there is an allegation against the Principal then the Chair of Governors should be told and refer on to the LADO without informing the Principal first. Staff may consider discussing any concerns with the DSL 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.

If a teacher is dismissed because of serious professional misconduct, or might have been dismissed had the employee not left first, the Principal must consider whether to refer the case to the Secretary of State by making a referral to the Teaching Regulation Authority (TRA). Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in *Teacher misconduct: the prohibition of teachers.* Further information is available on the TRA website. Similarly, a referral will be made to other regulatory bodies such as the Health and Care Professions Council (HCPC) or Nursing & Midwifery Council (NMC) where relevant.

For all allegations, other than those found to have been malicious or false, the following information must be kept on the file of the person accused:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved;
- A note of any action taken, and decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded;
- A copy provided to the person concerned, where agreed by children's social care or the police;
- A declaration on whether the information will be referred to in any future reference.

Other than where allegations are false, malicious, unsubstantiated or unfounded, the outcome should be made clear when providing references to prospective employers, provided that the information is factual and does not include opinions. This is particularly important where the person moves into another position involving working with children.

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

Concerns that do not meet the harm threshold (low-level concerns)

It is critical for all staff to promote an open and transparent culture in which all concerns about all adults are shared responsibly and with the right person, recorded and dealt with promptly and appropriately. This will enable the school to identify concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about

professional boundaries and act within these boundaries, in accordance with the ethos and values of the school.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the staff code of conduct and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. This includes inappropriate conduct outside of work. Just because a concern is a low-level one, that does not make it insignificant. Some examples of such behaviour could include being over-friendly with children, having favourites, taking photos of children on their mobile phones, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or humiliating pupils.

Low-level concerns could arise for a number of reasons such as through suspicion, complaint, disclosure made by a child/parent/other person outside or inside the school, or as a result of vetting checks. Such behaviour can exist on a wide spectrum from the inadvertent, thoughtless or misunderstood, to that which is ultimately intended to enable abuse. If staff find themselves in a situation which could be misinterpreted, might appear compromising to others, or on reflection they believe they have behaved in a way that they consider to have fallen below the expected professional standards, they should self-refer. This is for their own protection and in order to help the school provide them with any necessary advice, support or training in the spirit of openness, trust and transparency.

Any low-level concern about a member of staff should be reported to the Principal. Staff should feel confident to self-refer. Where a low-level concern is raised about the Principal, it should be reported to the Chair of Governors, in accordance with paragraph 74 of KCSIE. If a low-level concern relates to a contractor or supply agency worker, it should be shared with the Principal, recorded and their employer notified about the concern so that any patterns of inappropriate behaviour can be identified.

The Principal will record all low-level concerns in writing. This will include:

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

Where a third party has raised the concern, the Principal should collect as much evidence as possible by speaking directly to the person who raised the concern (if known) as well as to the individual involved and any witnesses.

In the absence of the Principal, staff should report any low-level concerns to the Deputy Principal, who is also the DSL. The Deputy Principal will inform the Principal immediately upon his return.

If there is any doubt as to whether information is a low-level concern or an allegation that may meet the harm threshold, the Principal will consult with the LADO.

All records of low-level concerns will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). The records will be reviewed to identify any potential patterns of concerning, problematic or inappropriate

behaviour. Where such a pattern is identified, appropriate action will be taken, either through the school's disciplinary procedures or, where a pattern moves from a concern to meeting the harms threshold, it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur so that policies can be revised or extra training delivered to minimise the risk of it occurring again. These records will be retained until the individual leaves the employment of the school. Learning lessons applies to all cases (allegations and low-level concerns) not just those which are concluded and found to be substantiated.

In accordance with KCSIE, schools should only provide substantiated safeguarding allegations in references. Therefore, low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference such as incidents involving misconduct or poor performance. If a low-level concern, or pattern of concerns, has met the threshold for referral to the LADO and found to be substantiated, it will be included in a reference.

14. Staff training

It is important that all staff, including the Principal, governors and volunteers in regulated activity, have training at induction to enable them to recognise the possible signs of abuse, neglect and exploitation so they know what to do if they have a concern. This training is in line with advice from HSCP and includes Prevent and online safety which, amongst other things, includes an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring. 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 of KCSIE, an explanation of the school's reporting and recording arrangements and the contact details and role of the DSL. Governors are additionally 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 it employs 'safe' staff and deters and prevents unsuitable people from being given the opportunity to work with children through clear safer recruitment processes which demonstrate a commitment to safeguarding. Full details of these procedures are set out in the school's safer recruitment policy which follows the guidance in Part Three of KCSIE together with the LSP's 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. CVs will only be accepted alongside a fully completed application form;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children. References will be obtained before interview where possible so that any concerns can be explored further with the referee and taken up with the candidate at interview. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should not be included in any reference;
- provide evidence of identity. It is important to be sure the person is who they claim to be and this includes being aware of the potential for individuals changing their name. Best practice is checking the name on the birth certificate where this is available;
- provide evidence of qualifications;
- provide evidence of their right to work in the UK;
- be interviewed;

- if shortlisted, complete a self-declaration form of their criminal record and other information that would make them unsuitable to work with children;
- understand that the school will consider carrying out an online search as part of its due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. The school will inform shortlisted candidates that online searches may be done as part of due diligence checks.
- 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. In this instance, the individual must be appropriately supervised and all other checks carried out (separate barred list checks must only be carried out for newly appointed staff who are engaging in regulated activity pending the receipt of an Enhanced Certificate with Barred List information from the DBS, or where an individual has worked in a post in a school or college that brought them into regular contact with children which ended not more than three months prior to that person's appointment to the organisation. The school will carefully consider whether it would be appropriate to request an enhanced DBS check in cases where the three month rule applies and may still choose to carry out an enhanced DBS check in these circumstances);
- 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 as an employee, as a governor that retains or has been given management responsibilities, or from becoming a governor;
- 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. These individuals must undergo the same checks as all other staff. This includes obtaining an enhanced DBS even if the individual has never been to the UK. Schools must also make any further checks they think appropriate so that any events that occurred outside the UK can be considered. Following the UK's exit from the EU, the same approach should apply for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world. Where available, these checks could include criminal record checks for overseas applicants or obtaining a letter via the applicant from the professional regulating authority in the relevant country confirming they have not imposed any sanctions or restrictions and/or that they are aware of any reason why they might be unsuitable to teach.

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. The school will not ask to see a DBS certificate for visitors attending in a professional capacity where the visitor's employer has confirmed their staff have appropriate checks.

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. Online safety, filtering, monitoring and cyberbullying

Our pupils use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, 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. This includes considering how online safety is reflected in all relevant policies and whilst planning the curriculum, teacher training, the roles of the DSL team and E-Safety Officer, and parental engagement. Further advice is available in the government guidance 'Teaching online safety in school'.

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

- Content, or being exposed to illegal, inappropriate or harmful content online;
- Contact, or being subjected to harmful interaction with others online;
- Conduct, or personal online behaviour that increases the risk of, or causes, harm;
- Commerce, or risks such as online gambling, inappropriate advertising, phishing or financial scams.

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. It is important to recognise that child-on-child abuse can happen online. Mobile phone networks (i.e. 3G, 4G and 5G) can give children unlimited and unrestricted access to the internet. This means some children sexually harass, bully and control others via this technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Due to the scale of the challenge and pupils' connectivity on personal devices at school and at home, the school believes the correct approach is through education alongside an appropriate level of filtering and monitoring. The filter is a tool to try and limit students' access to inappropriate content but it is not as effective as equipping young people to protect themselves.

The school's Bring Your Own Device and Online Safety, IT and Acceptable Use policies cover the use of mobile and smart technology in the school and explain how we try to keep pupils safe. 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 filtering and monitoring on school devices and the school network. The school uses Smoothwall Filter and Firewall to manage internet access and protect the network. The internet filter is customised to apply different levels of filtering and protection to each pupil year group, and this allows the school to manage age related content by allowing or blocking different categories and web addresses. It also stops access at night giving different 'lights out' times for different pupil years. The filter uses real time dynamic content analysis to categorise new and existing web content by analysing the content, context and construction of each page. The firewall is a unified threat management solution that protects the network with a perimeter firewall, packet inspection, intrusion detection and prevention. Staff and pupils are encouraged to report any websites they believe are incorrectly blocked to the school for review. Any website access that is flagged or blocked is reviewed, logged and passed on either to the e-safety officer or the DSL as appropriate. This system is regularly updated and the list of blocked websites is constantly updated by the company providing the service. The DSL, Director of IT and the SLT also regularly review the school's filtering and monitoring provision and effectiveness of its security protection procedures in order to safeguard its information security and data access management systems from cyber-crime technologies. The school is mindful of the DfE's guidance 'Meeting digital and technology standards in schools and colleges' and 'Cyber security standards for schools and colleges'.

Cyberbullying by pupils via online technology 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. 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.

Sexting

Sexting is defined by KCSIE as "sharing nudes and semi-nude images and/or videos". 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 such cases, the school will follow advice from the police. The UK Council for Child Internet Safety (UKCIS) provides detailed advice about sharing of

nudes and semi-nude images in its guidance *Sharing nudes and semi-nudes: advice for education settings in working with children and young people*. The school has regard to this advice in formulating its procedures for dealing with any incidents of sexting.

If an incident comes to the attention of staff, they should adhere to the following guidelines and report it to the DSL as soon as possible:

• Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.

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

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

• Do not ask the child/children who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL team.

• Do not share information about the incident with other members of staff, the pupils it involves or their, or other, parents.

• Do not say or do anything to blame or shame any young people involved.

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

The DSL 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 in order to best support the child 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 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 an immediate referral is not necessary, a risk assessment will be undertaken for dealing with the incident. If at any point there are causes for concern, a referral can still be made to the police or social care. It is important to note that a disclosure might not be a single event and further information might be disclosed at a later date so the situation should be kept under review.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal – whilst

non-consensual is illegal and abusive. 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 DSL 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 DSL 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 DSL has been told about the content of the imagery. If a decision is made to view the imagery, the DSL 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;
- necessary to report the image to a website, app or suitable reporting agency such as the IWF;
- 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 DSL will first discuss the decision with the Principal and ensure that the viewing is undertaken by a member of the DSL team with another member of staff present, following the procedures outlined in the UKCIS 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 disconnected from data and Wi-Fi, 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.

Abuse, neglect and exploitation

All staff should be aware of indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Abuse, neglect and exploitation are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff, but especially the DSL team, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms including, but not limited to, sexual abuse, harassment and exploitation, domestic abuse in their own intimate relationships, criminal exploitation, serious youth violence, county lines and radicalisation. Children are at risk of abuse and other risks online as well as face to face, and abuse can take place concurrently both online and offline. Children can also abuse other children online and offline.

In all cases, if staff are unsure, they should always speak to a member of the DSL team.

Indicators of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm of by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult(s) or by another child/children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and 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: including Sexual Violence and Sexual Harassment, involves forcing or enticing a child (can also include child to child) 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 child-on-child 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: 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 child-on-child 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 DSL 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.

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.

All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify and report 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 safeguarding lead.

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 DSL 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.

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 DSL to agree a course of action, and also make a written record of their concern using the software package **MyConcern**. This confidential system of recording child protection concerns is reviewed regularly by the DSL 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 DSL team 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, neglect and exploitation 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 DSL. Otherwise let them know that someone will come to see them before the end of the day;
- report verbally to the DSL/DDSL to agree a course of action, although any staff member can make a referral to children's social care. In the absence of the DSL and the DDSLs, 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 DSL 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 DSL 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 DSL 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 DSL, the DDSLs, 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 DSL, the DSL 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. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Tring Park uses MyConcern software for this purpose. Records should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and outcome. If in doubt about recording requirements, staff should discuss with the DSL.

Child-on-Child Abuse: children with harmful behaviour

All staff should be aware that children can abuse other children or young people and that it can happen both inside and outside of school as well as online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

Tring Park is committed to a whole school approach to ensure the prevention, early identification and appropriate management of child-on-child abuse within our school and beyond. In cases where child-on-child abuse is identified, the school will follow its child protection procedures, taking a contextual approach to support all young people who have been affected by the situation.

All staff should understand that even if there are no reports in school of child-on-child abuse, it does not mean it is not happening: it may be the case that it is just not being reported. As such, it is important that if staff have any concerns about child-on-child abuse they should speak to the DSL or DDSLs. In all cases, if staff are unsure, they should always speak to the DSL team.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, such as dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- 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;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, 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.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Some of these behaviours will need to be handled with reference to other policies such as the behaviour, anti-bullying and online safety IT and user agreement policies.

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.

Technology is a significant factor in many safeguarding and wellbeing issues and all staff should be aware that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. The school recognises the importance of distinguishing between problematic and abusive sexual behaviour (harmful sexual behaviour HSB). The NSPCC defines HSB as *"Sexual behaviours expressed by children... that are developmentally inappropriate, may be harmful towards self and others, or be abusive towards another child... or adult".* Further information about the range of sexual behaviours is available on this NSPCC link: [Harmful sexual behaviour framework: an evidence-informed operational framework for children and young people displaying harmful sexual behaviours (nspcc.org.uk)](#).

The Brook Sexual Behaviours Traffic Light Tool can also be very helpful in identifying sexual behaviours by children www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool.

Whilst research and societal belief indicates that girls are more frequently identified as being abused by their peers, it is important to remember that this is not solely confined to girls. Both boys and girls experience child-on-child abuse, but they often do so in gendered ways.

All staff should be aware of indicators which may signal that children are at risk of, or suffering from, child-on-child abuse. These may include increased absence from school, a change in friendships or relationships with 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. Any such issues must be reported via MyConcern. The DSL team will keep a log of sexual conduct incidents and these incidents will be recorded on MyConcern.

The school takes a zero-tolerance approach to child-on-child abuse. If staff have any concerns, they should speak to the DSL team immediately to help identify and address any concerning trends and identify pupils who may need support. All staff have an important role to play in preventing child-on-child abuse and responding when they believe a child may be at risk from it. It is the responsibility of all staff to challenge the attitudes that underlie such abuse, both inside and outside the classroom and to work with the whole school community in promoting positive values and encouraging a culture of tolerance and respect. Creating a culture of trust in which pupils feel able to share their concerns openly and in a non-judgmental environment is key.

If a child discloses possible child-on-child abuse to staff, they must reassure the victim that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. All allegations of child-on-child abuse must be recorded, investigated and dealt with appropriately. Pupils are regularly reminded that they can report an incident to any member of staff whom they feel comfortable talking to. In particular, however, key staff who are available for this purpose are the pupil's houseparents, tutor, the heads of key stage, the medical centre nurses, counsellors and the DSL team. If a pupil does not want to make a report to a member of staff in person, Whisper is an online confidential reporting system, available on every school computer, that allows pupils to confidentially send a message to the member of staff of their choice.

Child on child **sexual violence** and **sexual harassment (SVSH)** is a specific safeguarding issue in education as stated in KCSIE (staff should refer to Part 5 of KCSIE for further information). SVSH can occur between two children of any age and sex from primary through to secondary stage and/or between groups of children. All cases of child-on-child abuse will be considered on a case by case basis with the DSL team taking a leading role using their professional judgement and supported by other agencies such as the Hertfordshire Local Safeguarding Partnership as required. Research suggests that up to 30% of child sexual abuse is committed by someone under the age of 18. 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 speak to the DSL as soon as possible. The management of children and young people with sexually harmful behaviour is complex and 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 child-on-child abuse are supported.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. The school takes a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. It is important to understand the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. Physical behaviour such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting

up skirts must be challenged and dismissing or tolerating such behaviours risks normalising them.

Sexual violence between children can happen both inside and outside of school. It can happen in the form of sexual offences as set out under the Sexual Offences Act 2003 in the form of rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16 and sexual intercourse without consent is rape.

Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of school. It is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It can include sexual comments, sexual jokes, physical behaviour such as deliberately brushing against someone or interfering with someone's clothes, displaying pictures or photos of a sexual nature, upskirting (which is a criminal offence) and online sexual harassment. Online sexual harassment includes consensual and non-consensual sharing of nude and semi-nude images and/or videos, sharing of unwanted explicit content, sexualised online bullying, unwanted sexual comments and messages, sexual exploitation, coercion or threats, and coercing others into sharing images of themselves or performing acts they are not comfortable with online. It is important to consider sexual harassment in broad terms as it creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. The latter is developmentally inappropriate and is considered "harmful sexual behaviour" (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously between the two. Both ages and the stages of development of the children are critical factors with HSB. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them. Sources of confidential specialist support and advice for HSB are detailed in annex B of KCSIE. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse or trauma and it is important that they are offered appropriate support.

The school will respond to all reports and concerns of child-on-child SVSH, including those that have happened outside of the school or online. While any report should be taken seriously, staff should be aware that it is more likely that girls will be the victims and boys the perpetrators. It is important to acknowledge and understand the scale of harassment and abuse that exists even though children might not tell staff about it. Downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and lead to children not coming forward and reporting it. This is why staff must maintain the attitude of 'it could happen here'. Children may not find it easy to tell staff about their abuse and it may be that staff overhear a conversation or notice a change in the child's behaviour. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told. While it is important for staff not to ask children leading questions during a report/disclosure, staff should not hesitate to ask children if they have been harmed and the nature of the harm.

The school's initial response to a report from a child is incredibly important as it can encourage or undermine the confidence of future victims of SVSH to report or come forward. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting SVSH. Nor should a victim

ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them. Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. However, the school should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation. Further advice about confidentiality and anonymity are set out in part 5 of KCSIE but, ultimately, the DSL will have to balance the victim's wishes against the duty to protect the victim and other children.

If a concern is reported to the DSL, an immediate risk assessment will be undertaken as required that considers the victim's protection and support, the perpetrator, any other children and staff affected and any additional implications of boarding. It is important to consider every report on a case-by-case basis. The school will consider the victim's wishes, the nature and degree of the alleged incident, the ages and developmental stages of those involved and any power imbalance between the children. It will also consider whether the alleged incident is a one-off or a sustained pattern of abuse, that SVSH can occur within intimate personal relationships between children, whether there are any ongoing risks to anyone involved and any other related issues or wider context. When to inform the alleged perpetrator also requires careful consideration. When a report is going to be made to children's social care and/or the police, as a general rule the school will speak to the relevant agency to discuss next steps and how the alleged perpetrator will be informed of the allegations. If an allegation of SVSH progresses through to the criminal justice system, the school will offer support and act appropriately with regard to anonymity, witness support and the criminal process in general. Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses. Consideration also needs to be given to intra-familial harms and any necessary support for siblings following incidents

Local specialist support and advice is available from HertsSARC (Hertfordshire Sexual Assault Referral Centre) which offers a range of training and free support services and practical help for anyone aged 13 or over in Hertfordshire who has experienced sexual violence and/or sexual abuse. The team includes specially trained independent sexual violence advisors who will support those who have been assaulted. Their contact details are 0808 178 4448 herts.sarc@nhs.net. Referrals for children under 13 should be directed through Hertfordshire Children Services.

There are four likely scenarios when managing reports of SVSH but it is always important to regularly review decisions and actions, update policies to reflect lessons learned and look out for patterns of concerning behaviour. Where a pattern is identified, a course of action should be decided upon and consideration should be given to whether there are any wider cultural issues at play and whether extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. All four scenarios should be underpinned by the principle that there is a zero tolerance approach to SVSH and it will never be acceptable or tolerated. All concerns, discussions, decisions and their rationale should be recorded. The four scenarios are:

1. **Manage internally**
   This may be appropriate for one-off incidents or where there is no need for early help or statutory intervention. These cases may be managed by using the behaviour and anti-bullying policies and providing pastoral support.
2. **Early help**
   In some cases, children may not require referral to statutory services but would benefit from early help in the form of support as is appropriate as soon as a problem emerges at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later and can be particularly useful to address nonviolent harmful sexual behaviour and may prevent escalation of sexual violence. Early help and the option to manage a report internally do not need to be mutually exclusive: the school can manage internally and seek early help for both the victim and the perpetrator. Hertfordshire's Continuum of Need document provides guidance about thresholds to help ensure that the right response is given, by the right services, at the right time.
3. **Referrals to children's social care**

Where a child has been harmed, is at risk of harm, or is in immediate danger, a referral will be made. Parents will normally be informed at the point of referral unless there are compelling reasons not to (if informing a parent is likely to put the child at additional risk). Any decision would be made with the LSP. Where statutory assessments are appropriate, the DSL team will work alongside, and cooperate with, the relevant social worker. Collaborative working will help ensure the best possible coordinated support is implemented for the victim and, where appropriate, the perpetrator and any other young people requiring support. The school will take any immediate action required to protect the victim and any other children. If children's social care decides that a statutory intervention is not appropriate, the DSL will consider other support mechanisms such as early help, specialist support and pastoral support.

4. **Reporting to the Police**

Where a report is made of a criminal act such as rape, assault by penetration or sexual assault, this will always be passed on to the police. Any report to the police will generally be in parallel with a referral to children's social care. Where a report has been made to the police, the school will consult with the police and agree what information can be disclosed to any staff, the alleged perpetrator and their parents, as well as the best way to protect the victim and their anonymity. Generally, parents will be informed at this stage unless there are compelling reasons not to. Where there is a criminal investigation, the school will cooperate with relevant agencies to support all children involved and advice will be sought from the police where required. Whilst protecting and/or taking any disciplinary measures, the school will continue to liaise closely with the police and other agencies to ensure that any actions taken by the school will not jeopardise the police investigation. The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail conditions. Whatever arrangements are in place, the school will consider what additional measures may be necessary to manage any assessed risk of harm that may arise. Particular regard should be given to the additional stress and trauma that might be caused to a victim within the school and the potential for the suspected person to intimidate the alleged victim. It may be necessary for the parties to go home during a police investigation. Again, this is in the best interest of those involved and should not be perceived as a judgement of guilt before any legal proceedings. Careful liaison with the police should help to develop a balanced set of arrangements that considers both the management of risk and the rights of an unconvicted person. If the police decide to take no further action, the school will continue to engage with specialist support for the victim and alleged perpetrator as required. Where a criminal investigation leads to a conviction or caution, the incident is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the school would seriously harm the education or welfare of the victim and, potentially, of other pupils.

With any report of SVSH, whilst the school establishes the facts and begins the process of liaising with children's social care and/or the police, the perpetrator will be removed from any classes they share with the victim and the school will consider how best to keep the two parties a reasonable distance apart on school premises. It may well be necessary for all concerned to be sent home while the matter is being investigated. Again, these actions are in the best interest of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator. The needs and wishes of the victim should be paramount (along with protecting the child) in any response. Wherever possible, the victim's daily experience should be as normal as possible, so that the school is a safe place for them. There may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the school will provide a safe space for victims to withdraw. Consideration will also be given to supporting children who have witnessed sexual violence. Witnessing such an event is likely to be traumatic and support may be required. It is likely that some children will take "sides". The school will do all it can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed, including online.

Suitable sanctions will be considered as outlined in the behaviour policy, including permanent exclusion. Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. In less severe cases where both parties remain at school, the

school will consider if it can keep both pupils in separate classes and boarding houses. The nature of the incident and the wishes of the victim will be especially important in determining how to proceed in such cases and appropriate support will be provided to both as required on a case-by-case basis. Taking disciplinary action and providing support are not mutually exclusive actions – they can, and should, occur at the same time if necessary. All of the above will be considered with the needs and wishes of the victim at the heart of the process, supported by parents as required, and any arrangements will be kept under review.

If a report of SVSH is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. Disciplinary action may also be appropriate if a report is deliberately invented or malicious.

Sexual assault can result in a range of health needs. Wide-ranging external support is available as set out in Part 5 of KCSIE.

In order to minimise the risk of child-on-child 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, underlining that there is a zero-tolerance approach to SVSH. The school also makes clear that pupils can raise concerns with any member of staff and that they will be listened to, believed and valued. In particular, pupils can make a report to the DSL team, medical centre, the counsellors, their houseparent or tutor. They can also use the confidential online Whisper reporting system which is available from any school computer.

Serious violence
All staff should be aware of indicators which may signal that children are at risk from, or are involved in, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of child criminal exploitation (CCE). All staff should be aware of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Staff should report any concerns to the DSL 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.

Some forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

CSE is a form of sexual abuse. It may involve physical contact, including assault by penetration or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. CSE does not always involve physical contact and may include involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE may happen without the child's knowledge, e.g. through others sharing videos or images of them on social media, and some children may not realise they are being exploited, believing they are in a genuine relationship. Further information is available in Annex B of KCSIE.

Possible indicators of both CSE and CCE include where children:
- appear with unexpected gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional wellbeing;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late;
- regularly miss school or do not take part in education;
- have older boyfriends or girlfriends (CSE);
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant (CSE).

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 DSL. Further information is available in the Home Office Guidance: *Child sexual exploitation: guide for practitioners.* Links to additional guidance about CCE and CSE can be found in Annex B of KCSIE.

Modern Slavery and the National Referral Mechanism (NRM)

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs, available support and how to refer them to the NRM is available in the *Modern Slavery Statutory Guidance: how to identify and support victims* which is available on www.gov.uk.

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.

Children can be targeted and recruited into county lines in a number of locations including in schools. Children are also increasingly targeted and recruited online and using social media. A number of the indicators for CSE and CCE listed above can also be applicable to county lines. Additional specific indicators of possible involvement in county lines include children who:
- go missing and are subsequently found in areas away from home;
- have been the victim or perpetrator of serious violence;
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation they have no connection with;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It can either happen offline, having been enabled online, or it can be crimes that can be committed only using a computer. Children with a specific skill and interest in computing and technology may inadvertently or deliberately become involved. If there are concerns about a child in this area., the DSL can consider referring to the Cyber Choices programme, which is supported by the Home Office and led by the National Crime Agency, working with the police. It aims to intervene when young people are at risk of involvement in cybercrime. Links to additional guidance are available in Annex B of KCSIE.

'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 DSL. 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 DSL 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 DSL will make a referral to the local authority children's social care; anybody can make a referral if necessary.

Forced marriage

Since February 2023 it has been a crime to carry out any conduct who purpose it is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. 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 B 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.

Although the Lead Nurse acts as the School's Mental Health and Wellbeing Lead, a number of staff at Tring Park hold Mental Health First Aid qualifications or Mental Health Lead training 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 DSL team.

Preventing radicalisation and extremism
Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

- **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 legitimises support for, or the use of, terrorist violence.
- **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.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are indicators that may give concern (see Appendix A). It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

The Prevent Duty
All schools are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of the school's wider safeguarding obligations. The DSL team has training in local procedures for making a Prevent referral.

Channel
Channel is a voluntary, confidential support programme which focusses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism

and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. The DSL team should 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 or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

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).

At Tring Park School, the DSL 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 DSL/DDSLs 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.

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

The Prevent duty is part of the school's wider safeguarding obligations. The DSL team and senior leaders have regard for the revised *Prevent duty guidance: for England and Wales,* especially paragraphs 141-210 which are specifically concerned with education.

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. 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 DSL and DDSLs 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 DSL 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 DSL 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 unexplainable and/or persistent absences from 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 DSL 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, neglect and exploitation 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 DSL. Children with SEN can be more prone to peer to group isolation and child-on-child abuse than other children and staff may need to consider extra pastoral support. Further information and links to advice websites for protecting children with SEN are available in Part Two of KCSIE.

Children who are lesbian, gay, bisexual or gender questioning
A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder. It is recommended that when families / carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should consider the broad range of their individual needs, in partnership with the child's parents (other than where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to DfE *Guidance for Schools and Colleges in relation to Gender Questioning Children*, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture

where they can speak out or share their concerns with members of staff. The school has an Equality, Diversity and Inclusion committee that promotes the needs of the LGBT community at Tring Park and provides support for anyone who needs a trusted adult in this regard. All members of the EDI committee can be contacted using Whisper, the confidential online reporting system.

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 (2022) 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 Coordinator.

Remote Learning and how pupils can learn online at home safely

During circumstances in which pupils cannot learn at school and must continue their education online from home remotely, the principles of KCSIE continue to apply. Additional arrangements are necessary to ensure that pupils can learn online at home safely. These procedures are detailed in the school's Safeguarding policy Annex: Arrangements in the event of a pandemic related closure, as well as the school's Distance Learning Agreement.

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 DSL. 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, neglect and exploitation.

Staff should only discuss concerns with the DSL, 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 DSL.

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 CHO116
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

dbsdispatch@dbs.gsi.gov.uk

Prevent Contacts

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

National Prevent advice line: 0800 011 3764

Confidential Anti-Terrorist Hotline: 0800 789 321

Hertfordshire Constabulary Prevent Team: Prevent@Herts.pnn.police.uk

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

Safeguarding Policy Annex:

Arrangements in the event of an emergency closure.

In the event of an emergency school closure, for example as a result of a pandemic such as Coronavirus (COVID-19), the principles of Keeping Children Safe in Education (KCSIE) continue to apply. This includes if children receive educational provision remotely and/or if children of critical workers, some boarders and vulnerable children are cared for and educated on the school premises. However, it is also necessary to consider how safeguarding policies and procedures can best be adapted under such circumstances in order to keep children safe. Although the way the school operates during the coronavirus pandemic is fundamentally different to business as usual, a number of key safeguarding principles remain the same:

- With regards to safeguarding, the best interests of children must always continue to come first.

- If anyone connected with the school has a safeguarding concern about any child they should continue to act immediately.

- A member of the DSL team will always be available and on call.

- It remains essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children, either in person or online. This includes supply teachers and volunteers.

- Children should continue to be protected when they are online.

Negative experiences and distressing life events, such as the current situation, can affect the mental health of children and adults. Teachers should be aware of this in setting expectations of children's work where they are at home.

It is important to continue to take a whole school approach to safeguarding. This is the best way of ensuring that any new policies or procedures in response to COVID-19 do not weaken the approach to safeguarding or the school's child protection policy. Whilst the school continues to operate in a lockdown during the pandemic, it will follow these safeguarding guidelines:

Safeguarding information for All Staff and the Management of Safeguarding

- The school will follow any updated advice from the Hertfordshire Safeguarding Children Partnership (HSCP). This includes advice regarding children with Education Health and Care (EHC) plans, the LADO and children's social care reporting mechanisms, referral thresholds and children in need. HSCP has a web page about safeguarding during COVID-19 with guidance including carrying out virtual meetings for looked after children and child protection conferences. The link is: https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/safeguarding-during-covid-19.aspx

- If staff and volunteers have any concerns about a child, including those attending school and those receiving remote provision, they should report them **immediately** to the DSL team. Staff and volunteers who interact with children, including online, should look out for any signs, as detailed in the school's Safeguarding policy, that might indicate a child is at risk. It is important to remember that some children will have a difficult home life and

therefore the school, and children's links with members of staff, can be very important to them. This particularly applies to any category of child who is deemed as being vulnerable or at greater risk as set out in KCSIE and the school's Safeguarding policy.

- During term time the DSL (or a deputy) is always available for staff in the school to discuss any safeguarding concerns. If the DSL is away from school, an all-staff email is sent confirming which deputy is on duty. If any children are being educated on the school premises, a member of the DSL team will be available onsite. If all pupils are being educated remotely, or if for some reason it is not possible for a member of the DSL team to be onsite, one of the team will be available by phone or online. The DSL team will be available to liaise with staff, manage access to child protection files, liaise with social workers with access to children in need and/or carry out statutory assessments. Anselm Barker is the DSL and Charlotte Robinson, Benny Simpson and Kay Wayman are the Deputy DSLs. If you have an urgent child protection concern, staff should ring the DSL on 07926 281550 or 01442 821681. To make a report that is not urgent, use MyConcern. For correspondence that is not urgent, email DSL@tringpark.com.

- The school will continue to communicate and work with any social workers and the virtual school head of any children. This includes reporting any unexplained absence.

- Any children who do not meet the definition of a 'vulnerable' child but are a safeguarding concern must continue to be supported as previously and any concerns should still be reported to the DSL.

- The School's Attendance Officer, Karina Jones, will complete the DfE daily online attendance form for the children of any critical workers and vulnerable children attending the school. Although it is not a DfE requirement for schools to report attendance if pupils are being educated remotely during lockdown, staff should continue to report attendance internally. Pastoral staff will contact any pupils who are not engaging as expected to ensure that there are no safeguarding concerns.

- Child-on-child abuse remains a risk, either between any children who are attending the school or those being educated remotely. The school community must remain vigilant to the signs of child-on-child abuse, report any concerns to the DSL and support any victims in accordance with KCSIE. The school will continue to be informed by the principles of part 5 of KCSIE in managing any reports of Child Sexual Violence and Sexual Harassment.

- Staff should be particularly vigilant for any online safety concerns given that children will be spending more of their time online. It is important for staff to continue to follow the school's Online Safety Acceptable Use and IT policy, seek advice from Sarah Bell, the school's E-safety Officer, and report any concerns as normal. Staff should also follow the guidelines laid out in the school's Distance Learning Agreement in order to ensure that they have all of the necessary safeguards in place for online distance learning platforms. Only school approved systems, platforms and school email accounts should be used in order to ensure that appropriate filtering and monitoring systems are in place. The E-safety officer will continue to monitor online activity and send regular online safety bulletins and advice to parents, pupils and staff.

- The school's team of houseparents, medical centre nurses and counsellors will continue to provide pastoral support and advice and maintain regular contact with any pupils with mental health and wellbeing concerns. This will take place using Microsoft Teams.

- The principles of part 4 of KCSIE continue to inform the approach staff should follow if they have concerns about a member of staff or volunteer who may pose a safeguarding

risk to children as detailed in the school's Safeguarding policy. The school has a legal duty to refer anyone to the DBS who has harmed or poses a risk of harm to a child or vulnerable adult. Where appropriate, the school should also consider making a referral to the Teachers Regulation Authority (TRA) by email.

- If any new staff or volunteers are appointed during this time, they will continue to be provided with a safeguarding induction and provided with all of the policies that are normally given to new staff at induction, including the school's Safeguarding policy and this Annex.

- The DSL will continue to request any relevant welfare and child protection information for a new child who joins the school. This includes access to any EHC plan, child in need plan and/or child protection plan. If the child is 'looked-after', the school will request the personal education plan and details of the social worker/Virtual School Head. If a child leaves the school, this information will be forwarded securely to the child's new school and the local authority informed.

- The school will continue to keep a record of any staff who are attending school each day.

Safer Recruitment

The school will continue to have regard for Part 3 of KCSIE during a lockdown and ensure that when recruiting staff/volunteers, the safer recruitment checks are completed as detailed in the school's Safer Recruitment policy. Appropriate checks must be completed for those engaged in regulated activity and a risk assessment process completed for any volunteers. Under no circumstance should a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity. If staff are temporarily moved to or from another setting, the DfE has clarified that there is no expectation for a DBS to be obtained. A current DBS for a different type of setting, e.g. one obtained for childcare, can be accepted by the school. However, the onus remains on the school to satisfy itself that the required checks have been made. This can be achieved by seeking assurance from their current employer. The receiving school should risk assess the shared member of staff in the same way as with a volunteer. The school's SCR will continue to be kept up to date.

Arrangements in the event of a full or partial reopening after a pandemic related school closure.

When the school reopens either fully or partially after a pandemic related closure, it will follow the relevant government guidelines in force at the time of the reopening. Risk assessments for pupils and staff and for the reopening of the school will be completed and published separately in advance of the reopening. These will detail the actions taken and procedures the school will follow to operate safely. The school will remain prepared to revert to online teaching at any time if necessary.