

STAHS Policies

P01: SAFEGUARDING AND CHILD PROTECTON

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Contents

Key contact details for safeguarding children at STAHS	5
External Agencies	5
Key School Contact Details	6
Legal Framework	7
Legislation	7
Statutory Guidance	7
Non-statutory Guidance	7
This policy and its related documents operates in conjunction with the following School policies and the related documents:	
Concerns about a child	8
Definitions of safeguarding and types and signs of abuse	8
Procedures for dealing with concerns about a child	11
Contextual Safeguarding	11
Pupils who need social workers	12
Looked After Children (LAC) and Previously Looked After Children (PLAC)	12
Pupils with SEND	12
LGBTQ+ pupils	12
Pupils requiring mental health support	13
Early Help and Pastoral Support	13
Procedures for dealing with concerns about a child	14
What staff should do if they have concerns about a child	15
Managing referrals	15
What staff should do if a child is in immediate danger or risk of harm	16
What staff should do if they have concerns about another staff member	16
What staff should do if they have concerns about safeguarding practices in the School	17
Communication and confidentiality	17
Arrangements for dealing with child-on-child allegations	18
Arrangements for dealing with allegations of abuse against teachers and other staff (including the head, Governors and volunteers)	19
Online safety and personal electronic devices	20
Communicating with parents	21
Reviewing online safety	21
Personal electronic devices	21
Upskirting	21
Consensual and non-consensual sharing of nude and semi-nude images and videos	21
Use of the School premises for non-school activities	22

Co-curricular activities and clubs	22
Staff code of conduct	22
Safer recruitment	22
Staff suitability	23
Ongoing suitability	23
Referral to the DBS	23
Single Central Record (SCR)	23
Management of safeguarding	24
Training	25
All Staff	25
DSL(s)	25
Oversight of safeguarding, including arrangements for reviewing policies and procedures	25
The School's arrangement to fulfil other safeguarding responsibilities	26
Arrangements for visiting speakers	26
Early years provision safeguarding arrangements	27
Disqualification from working in childcare	27
DSL for the EYFS	27
Policy information	28
APPENDIX 1 - Reporting Safeguarding Concerns Process Flowchart	29
Appendix 2: Specific Safeguarding Issues	30
Domestic abuse	30
Homelessness	30
Children missing from education	30
Admissions register	30
Child abduction and community safety incidents	32
Child criminal exploitation (CCE)	32
County lines	32
Cyber-crime	33
Child sexual exploitation (CSE)	33
Modern slavery	34
FGM	34
Forced marriage	35
Radicalisation	36
The Prevent duty	37
Pupils with family members in prison	37
Pupils required to give evidence in court	37
Mental health	37

Key contact details for safeguarding children at STAHS

External Agencies

Disclosure and Barring Service	Address:	DBS Customer Service PO Box 3961	
		Royal Wootton Bassett SN4 4HF	
	Telephone:	03000 200 190	
	Email:	customerservices@dbs.gov.uk	
Teaching Regulation Agency	Address:	Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT	
	Telephone:	0207 593 5393	
	Email:	Misconduct.teacher@education.gov.uk	
OFSTED Safeguarding Children	Telephone:	0300 123 4666	
	Email:	whistleblowing@ofsted.gov.uk	
Independent Schools Inspectorate	Telephone:	0207 6000100	
	Email:	concerns@isi.net	
Hertfordshire Safeguarding Children Partnership	Address:	Hertfordshire Safeguarding Children Partnership Team Room 152 Postal Point CH0116 County Hall Hertford SG13 3DQ	
	Telephone:	0300 123 4043	
Hertfordshire Designated Officer (LADO)	Telephone:	01992 555420	
NSPCC Helpline	Telephone:	For adults who are concerned about a child: 0808 800 5000	
		For children and young people (Childline): 0800 1111	

Key School Contact Details

Governors	Chair of Governors	
	Mrs Alison Arnold	
	01727 792514 (via the School)	
	Arnold.Alison@stahs.org.uk	
	Nominated Safeguarding Governor	
	Mr Neil Enright	
	01727 792514 (via the School)	
	Enright.Neil@stahs.org.uk	
Designated Safeguarding Lead ("DSL") and	Main DSL for the School	
Deputy Designated Safeguarding Leads	Miss Kirsty Eddison	
("DDSL")	Deputy Head Pastoral	
	07714 248873	
	01727 792205	
	EddisonK@stahs.org.uk	
	DDSLs for the Senior School	
	Miss Hannah McSherry	
	Mental Health and Well-being Lead	
	01727 792223	
	HEMcSherry@stahs.org.uk	
	The restrict you deare so g. a.v.	
	Mrs Helen Monighan	
	Head of Sixth Form	
	01727 792222	
	Monighan HW@stahs.org.uk	
	DDSLs for the Prep School	
	Mrs Lucy Still	
	Deputy Head Prep (Pastoral and Co-curricular)	
	01582 839270 StillL@stahs.org.uk	
	<u>StittEt@staris.org.uk</u>	
	Mrs Elizabeth Courtney-Magee	
	Head of Pre-Prep (EYFS)	
	01582 839270	
	CourtneymageeE@stahs.org.uk	

Designated Teacher for Looked After	Miss Kirsty Eddison	
Children	Designated Teacher for Senior School 01727 792205 EddisonK@stahs.org.uk	
Head	Mrs Amber Waite 01727 792514	

head@stahs.org.uk

Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

Statutory Guidance

- DfE (2021) 'The Prevent duty'
- DfE (2022) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2023) 'Keeping children safe in education 2023'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory Guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2023) 'Recruit teachers from overseas'

This policy and its related documents operate in conjunction with the following School policies and their related documents:

Pupil Behaviour Policy

P01: Safeguarding and Child Protection

- Pastoral Care and Personal Development Policy (including PSHE and RSE)
- Anti-bullying Policy
- Data Protection Policy
- Electronic Information and Communications Policy
- HR and Employment Policy

Concerns about a child

STAHS is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing board, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL for the School is Kirsty Eddison. In the absence of the DSL, child protection matters will be dealt with by a deputy DSL, all of whom are named in this document. The School has arrangements for listening to children and providing early help. Details of these arrangements can be found in this Policy and in the STAHS publication Keeping Safe: A *Pupil's Guide to Safeguarding*.

Definitions of safeguarding and types and signs of abuse

The terms "children" and "child" refer to anyone under the age of 18.

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

For the purposes of this policy, "abuse" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, "physical abuse" is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise

causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, "emotional abuse" is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, 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 the child to frequently 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, but it may also occur alone.

For the purposes of this policy, "sexual abuse" is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, "neglect" is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

For the purposes of this policy, "consent" is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, "sexual violence" refers to the following offences as defined under the Sexual Offences Act 2003:

- Rape: A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Assault by penetration: A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Sexual assault: A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, "sexual harassment" refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

For the purposes of this policy, "upskirting" refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the "consensual and non-consensual sharing of nude and semi-nude images and/or videos", colloquially known as "sexting", is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, "indecent imagery" is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Procedures for dealing with concerns about a child

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the School's Designated Safeguarding Lead ("DSL").

Upon receiving a disclosure of allegation or complaint of abuse or neglect from a child or any third party, all staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. STAHS uses CPOMS safeguarding software for recording all such information. If CPOMS is unavailable, staff should take careful notes, signed and dated, and ensure they are confidentially delivered to the DSL. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy), although a disclosure should not be stopped or compromised because there is only one member of staff present

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by discussing the wishes and feelings of the pupil at the time of disclosure or an appropriate time afterwards, and recording these on the CPOMS record. The School operates its processes with the best interests of the pupil at their heart.

Contextual Safeguarding

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to Children's Social Care Services. Specific Safeguarding Issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix 2 of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues. Pupils potentially at greater risk of harm

The School recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Looked After Children (LAC) and Previously Looked After Children (PLAC)

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The School will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability
 without further exploration; however, it should never be assumed that a pupil's indicators relate
 only to their disability
- Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a

pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Pupils requiring mental health support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Early Help and Pastoral Support

"Early help" means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with Hertfordshire Safeguarding Children Partnership's referral threshold document (which can be found at the Hertfordshire website Information for professionals and volunteers). The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

- Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:
- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to Children's Services for assessment for statutory services if the pupil's situation is not improving or is worsening.

Some pupils may not meet the threshold for early help, but for whatever reason may be in need of additional pastoral support such as listening services, school counselling or other school-based intervention. STAHS has a well-developed system of pastoral care through which we are able to provide additional support and early intervention for children in need of such help.

The pastoral teams in the Prep and Senior Schools provide pastoral support for pupils in a variety of ways, from informal chats and simply spending time with pupils to noticing when behaviour changes and reporting these changes to staff who are trained to help. The School also provides additional, confidential support through the School's Counselling Service, the Chaplaincy, The Mental Health and Well-being Lead Teacher and the School Nurses. In some cases, further interventions may be necessary and these can lead to interagency assessment using local processes which will be overseen by the DSL.

The School regularly shares information alerting appropriate staff to be aware of pupils who may need additional support. This information may be shared electronically or in-person, but regardless of how information is shared, the School always respects the confidentially of pupil information and no member of staff should ever divulge such information to any parent, pupil or other member of staff unless it is appropriate to do so (e.g., there is immediate risk to the pupil and the other person may be in a position to prevent harm).

The School works closely with parents to ensure that the support offered at the school is extended to the home where appropriate, and will help parents engage with outside agencies to ensure that their child is receipt of appropriate wrap-around care should they need it.

Procedures for dealing with concerns about a child

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the School's Designated Safeguarding Lead ("DSL").

Upon receiving a disclosure of allegation or complaint of abuse or neglect from a child or any third party, all staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. STAHS uses CPOMS safeguarding software for recording all such information. If CPOMS is unavailable, staff should take careful notes, signed and dated, and ensure they are confidentially delivered to the DSL. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy), although a disclosure should not be stopped or compromised because there is only one member of staff present

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by discussing the wishes and feelings of the pupil at the time of disclosure or an appropriate time afterwards, and recording these on the CPOMS record. The School operates its processes with the best interests of the pupil at their heart.

What staff should do if they have concerns about a child

If a member of staff (including volunteers and governors) has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by reporting these concerns on CPOMS and speaking to the DSL or deputy DSLs.

Staff will be aware that pupils 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. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the communication and confidentiality section of this policy.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible. Regardless of which member of the safeguarding team the matter is discussed with, the staff member reporting the concern will immediately record their concern on CPOMS.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely on CPOMS.

If a pupil is in immediate danger, a referral will be made to Children's Services and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the School will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Process Flowchart will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to Children's Services or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by Children's Services. Where Children's Services decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where Children's Services decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

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

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

The School's Local Safeguarding Children Executive is Hertfordshire Safeguarding Children Partnership. A full copy of their local procedures can be found on their website.

The School promotes the safeguarding of children at all times, and recognises that there are occasions outside of the normal teaching structure that require special consideration. These include:

- Close one-to-one teaching, for example in music instruction where peripatetic teachers normally teach one-to-one and in PE and Sport instruction where close one-to-one demonstration or some contact between staff and child is required.
- Supervised changing, for example, pupils changing into PE clothing in the Prep School.

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

If staff have concerns about another staff member, then this should be referred to the Head or Head of Prep (who will, in turn, inform the Head). Where there are concerns about the Head, this should be referred to the

Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the designated officer at Hertfordshire Safeguarding Children Partnership.

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

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found under STAHS HR and Employment Policy guidance document *Whistleblowing*. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

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

Communication and confidentiality

STAHS has an obligation to work in partnership with parents in order to promote the welfare of children. The School also aims to build up relationships of trust with children. Children and parents should feel able to raise with the School any concerns about safety and welfare in the knowledge that these will be dealt with sensitively.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the School will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the School will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

17 | Page

Where confidentiality or anonymity has been breached, the School will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

Arrangements for dealing with child-on-child allegations

For the purposes of this policy, "child-on-child abuse" is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's <u>statement of intent</u>.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers sometimes known as 'teenage relationship abuse'.
- Physical abuse this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can 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.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Related Document. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

Arrangements for dealing with allegations of abuse against teachers and other staff (including the head, Governors and volunteers)

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and the Hertfordshire Safeguarding Children Partnership's arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil
- Possibly committed a criminal offence against or related to a pupil or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (the LADO) or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-name basis.

Concerns about the behaviour of a member of staff should be referred to the Head for staff working on the Senior School site and the Head of the Prep School for staff working on the Prep school Site. The Head of Prep will inform the Head if any concern raised regarding a member of the Prep School staff.

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

- 1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the Head, who will act as 'case manager'. If an allegation is reported to the DSL or other member of staff, they should report to the Head as soon as possible. In some cases, the Head may delegate the role of 'case manager' to the DSL of the Senior or Prep School, but will be kept informed of the progress of the case at all times. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and may make any referral via them.
- 2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care.
- 3. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course of action, unless there is an objection

- by children's social care or the police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- 4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, WT and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
- 5. The case manager will ensure that parents are informed as soon as possible and kept informed about the progress of the case, subject to any advice from children's social care or the police
- 6. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
- 7. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

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

Online safety and personal electronic devices

The School will adhere to the Electronic Information and Communications Policy, and its related Acceptable Use documents at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The School will ensure that suitable filtering and monitoring systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the school's Data Protection Policy and Electronic Information and Communications Policy. The School will, however, ensure that the use of filtering and monitoring systems does not cause "over-blocking", which may lead to unreasonable restrictions as to what pupils can be taught online.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified.

Further information regarding the School's approach to online safety can be found in the Safeguarding and Child Protection Policy Related Document E-Safety.

Communicating with parents

As part of the usual communication with parents, the School will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The School will also make it clear to parents what their children are being asked to do online for school.

Reviewing online safety

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the School, in accordance with the School's Electronic Information and Communications Policy.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the School. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

Consensual and non-consensual sharing of nude and semi-nude images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with

instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

The School's full response to incidents of consensual and non-consensual sharing of indecent images and videos can be found in the Related Document Youth-produced Sexual Imagery.

Use of the School premises for non-school activities

Where the School hires or rents out School facilities or the School premises to organisations or individuals, (e.g. community groups, sports associations, or service providers that run extra-curricular activities), it will ensure that appropriate arrangements are in place to keep pupils safe. Where the School provides the activities under the direct supervision or management of School staff, child protection arrangements will apply.

Where activities are provided separately by another body, The School will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The School will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

If The School receives any allegation relating to an incident that happened when any individual or organisation was using their school premises for the purposes of running activities for children, the School will follow its safeguarding policies and procedures, which includes informing the LADO ([local authority designated officer].

Co-curricular activities and clubs

External bodies that host co-curricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running co-curricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

Staff code of conduct

The School's *Code of Conduct for Staff and Volunteers* can be found in the Staff Handbook area of SharePoint, and on the School's website. The aim of the Code of Conduct is to provide clear guidance about behaviour and actions to avoid placing pupils or staff at risk of harm or of allegation of harm to a pupil.

Safer recruitment

The School's full policy and procedures for safer recruitment are outlined in the Related Document Recruitment and Selection Procedures.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The School will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

As part of the shortlisting process The School will carry out an online search to help identify any incidents or issues that have happened, and are publicly available online. The School will inform shortlisted candidates that online searches may be done as part of due diligence checks.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The School will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Single Central Record (SCR)

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

All members of the governing body are also recorded on the SCR.

The following information is recorded on the SCR:

• An identity check

- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The details of an individual will be removed from the SCR once they no longer work at the school.

Management of safeguarding

The School's DSL is Kirsty Eddison who is a member of the Executive Team.

The Deputy DSLs are listed in the Key Contacts section at the start of this policy. In the absence of the DSL, all reports should be made to a Deputy DSL. This ensures there is the required cover for the role at all times.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 working days. The DSL will ensure secure transit and obtain confirmation of receipt.

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

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/or DDSLs will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School shares the contact details of all members of the Executive Team (including the Head and the DSL) with all staff, along with a rota of which members of the Executive Team are contactable at all times. Concerns should be passed along to the duty member of the Executive Team, who will be able to contact the DSL, or failing this, will be able to contact Hertfordshire Safeguarding Children Partnership to seek advice.

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

Whilst Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Training

Induction and training are in line with advice from Hertfordshire Safeguarding Children Partnership and in line with Part One of *KCSIE*. Annual update training is compulsory for all staff and Governors.

All Staff

All new staff (including temporary staff and volunteers) will be provided with induction training that includes:

- This Safeguarding and Child Protection Policy
- The role and identity of the DSL and all Deputy DSLs
- The Behaviour Management Policy
- The Code of Conduct for all Staff and Volunteers (including guidance on staff/pupil relationships and communications including the use of social media)
- The School's whistleblowing procedures
- The Electronic Information and Communications Policy
- The safeguarding response to children who go missing from education
- A copy of Part One of KCSIE
- School leaders and staff who work directly with children will also be required to read Annex A of KCSIE (and Part Five of KCSIE)
- Completion of questions on KCSIE
- Understanding radicalisation and staff responsibilities under the Prevent duty
- Before taking up their post, all staff receive in-person safeguarding and child protection training led
 by the DSL, or where this is not possible they complete online safeguarding and child protection
 training and receive in-person training as soon as possible once they start work. In-person training
 includes online safety and an understanding of the expectations, applicable roles and
 responsibilities in relation to filtering and monitoring.

Copies of the above documents are provided to all staff during induction, and are available through the Staff Handbook section of SharePoint.

DSL(s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the Hertfordshire Safeguarding Children Partnership's approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

All Deputy DSLs are trained to the same level as the DSL, and the Head or any of the Deputy DSLs can act in the role of DSL in the event that the DSL is unavailable.

Oversight of safeguarding, including arrangements for reviewing policies and procedures

Mr Neil Enright is the governor designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. He is a member of the Governing Body.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The Governing Body, guided by the designated safeguarding governor, reviews all Safeguarding policies and procedures annually in conjunction with advice from the Independent Schools Inspectorate with respect to the statutory safeguarding obligations of schools. In addition, the designated safeguarding governor visits the school at least annually to inspect the safeguarding practice in the school, and to ensure that the policies are followed effectively. The outcomes of these visits are reported to the full Governing Body.

The School draws on the expertise of staff, including the DSLs and Deputy DSLs, in shaping the School's safeguarding arrangements and policies.

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

The School's arrangement to fulfil other safeguarding responsibilities

The Governing Body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the School's ICT curriculum, and is also embedded in PSHE and relationships and sex education ("RSE").

The School has appropriate filters and monitoring systems (including Smoothwall for Education) in place to safeguard children from potentially harmful and inappropriate material online. These systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's guidance document *e-Safety*, which also includes detail on the use of mobile technology in School (and accessing 3G, 4G and 5G technology on School premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

26 | Page

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Early years provision safeguarding arrangements Disqualification from working in childcare

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

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

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

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years setting is Elizabeth Courtney-Magee.

27 | Page

Policy information

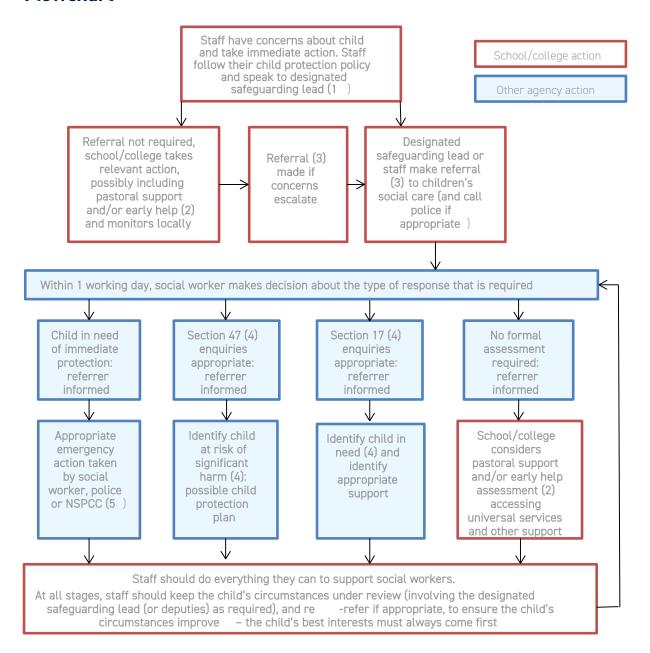
Policy and related documents		
Document title	Availability	
P01: Safeguarding and Child Protection	Yes - on website	
Child Missing in Education	Yes – on Parent Portal	
Code of Conduct for all Staff and Volunteers	Yes - on website	
e-Safety	Yes – on Parent Portal	
Intimate Care: Guidelines Regarding Children	Yes – on Parent Portal	
Keeping Safe – a Pupil's Guide to Safeguarding	Yes - on website	
Leaflet for Volunteers School Helpers (Prep School)	Yes - on website	
Leaflet for Volunteers School Trips (Prep School)	Yes – on website	
Low Level Concerns	Yes - on request	
Missing Pupil	Yes – on Parent Portal	
Pupil Supervision	Yes – on Parent Portal	
Prevent	Yes – on Parent Portal	
Recruitment and Selection Procedures	Yes – on request	
Safeguarding at STAHS – a Guide for Visitors (Senior School)	Yes - on website	
Sending nudes or semi-nudes and Youth Produced Sexual Imagery	Yes – on Parent Portal	
Staff Induction Checklist (including safeguarding)	Yes - on request	
Transgender Pupils	Yes - on request	
Visiting the School	Yes - on website	

Policies and related documents as indicated are available request from info@stahs.org.uk

St Albans High School for Girls, 3 Townsend Avenue, St Albans AL1 3SJ. Tel: 01727 853 800

This policy can be made available in large print or other accessible format if required.

APPENDIX 1 – Reporting Safeguarding Concerns Process Flowchart



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

Appendix 2: Specific Safeguarding Issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, "domestic abuse" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "Personally connected" includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to Children's Services where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children missing from education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Related Document The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible.

Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, "child abduction" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, "child criminal exploitation" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence
- Specific forms of CCE can include:
- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The School will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

County lines

For the purposes of this policy, "county lines" refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, "cyber-crime" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

Child sexual exploitation (CSE)

For the purposes of this policy, "child sexual exploitation" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.

- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern slavery

For the purposes of this policy, "modern slavery" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, "FGM" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. NB: This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.

• A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of "honour-based' abuse (HBA)", which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Forced marriage

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this policy, "radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, "extremism" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, "terrorism" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

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

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Prep School Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Senior School Pupils will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

38 | Page