



# St Hilda's Safeguarding Policy

Revised September 2023  
by the Designated Safeguarding Lead and the Head

Chair of Governing Body \_\_\_\_\_ Date \_\_\_\_\_

Safeguarding Governor

A handwritten signature in black ink, appearing to read 'J. M. Houghton', written over a horizontal line.

Date 01.09.23

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## **1. Policy Statement**

St Hilda's School recognises the contribution it makes to the safeguarding of children and the responsibility it has under Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 to have arrangements in place to safeguard and promote the welfare of children.

The school's Safeguarding Policy and Procedures has regard to statutory guidance *Keeping Children Safe in Education (KCSIE) (updated Sept 2023)*, *Working Together to Safeguard Children 2018 (with minor updates 2022)*, *DFE guidance on Child Sexual Exploitation 2017*, *DBS barring referral guidance 2019* and the *Prevent Duty Guidance April 2021*.

The Safeguarding Policy is ratified by the Aldenham Foundation Governing Body and reviewed on a regular basis (at least annually). The Governors recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis. Opportunities in the form of meetings and discussions are offered for all staff to contribute to the shaping of the safeguarding arrangements and policy.

The safeguarding procedures apply to all people working with children on school property and working with children on behalf of the school and/or nursery, whether on-site or off-site. This can include members of teaching and support staff, supply staff, contractors, volunteers, Governors and organisations or individuals who lease school facilities.

Every pupil should feel safe and protected from any form of abuse. This includes children who are in need (Section 17, Children Act 1989) and children who are at risk of harm (Section 47, Children Act 1989). The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

## **2. Terminology**

**Child Protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

**Abuse** is defined as a form of maltreatment of a child. Abuse may take the form of physical, emotional or sexual abuse and includes neglect. This may involve inflicting harm, or by failing to act to prevent harm. Children may be abused by an adult or adults or another child or children.

Safeguarding and promoting the welfare of children is defined for the purpose of this guidance as:

- Protecting children at risk from maltreatment and promoting the welfare and wellbeing of children in need of additional support, even if they are not suffering harm or at immediate risk.
- Preventing impairment of children's health or development, including mental health.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes (*Working Together to Safeguard Children, DFE 2018; updated 2022*).

## **3. Summary**

The welfare of all children, including Early Years Foundation Stage, at St Hilda's School and Bluebird Nursery must be the primary concern for all staff and the school will do all that it can, within reason, to ensure that the children in our care are safe and happy.

Safeguarding children is the action we take to promote the welfare of children and protect them from harm. **Every adult who comes into contact with our pupils has a role to play. Although referrals are usually managed via the DSL, anyone can refer a child to children's social care if necessary. Safeguarding children is everyone's responsibility.**

The school plays a crucial role in preventative education through a whole school approach to preparing pupils for modern Britain. This is underpinned by the school's behaviour policy, pastoral care, PSHE lessons and Relationships, Sex and Health Education (RSHE) programme.

The *Teacher Standards 2011 (updated 2021 to reflect minor changes in terminology)*, state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties and all staff have a responsibility to take appropriate action, working with other services as needed.

This policy seeks to demonstrate the commitment of the Head, all staff (including temporary staff), contractors, ECA staff, peripatetic teaching staff, volunteers, the governing body and all who lease school facilities to promoting a safe environment for children and to report any allegations of abuse or suspicions of abuse to the relevant local authority agency.

The school's safeguarding policy takes into account the statutory guidance, local child protection procedures and best practice. The school is committed to remedying any difficulties or weaknesses without delay. The policy is reviewed annually and presented to the governors.

The policy is written and reviewed by the Designated Safeguarding Lead in consultation with the Head and is ratified by the Governing Body of The Foundation on at least an annual basis.

## **Confidentiality**

Adults at the school should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should, however, guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to resolve the problem. They should never tell anyone who does not have a clear 'need to know', and that they will take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made. Every effort will be made to maintain confidentiality and guard against unwanted publicity for both the victim and the accused. These restrictions apply up to the point where the accused person is charged with an offence or the DfE/Teaching Regulation Agency (TRA) publish information about an investigation or disciplinary case (KCSIE Sept 2023).

## **Sharing confidential information**

Concerns regarding safeguarding issues inevitably involve the sharing of highly sensitive information. Whilst colleagues should be aware of their obligations under the General Data Protection Regulations (GDPR), concerns relating to sharing sensitive information should never be used as a reason for not passing on information to the DSL about a child at risk of harm. The school's safeguarding management software, MyConcern, is fully GDPR-compliant and should be the sole means (other than a direct report to the DSL) by which concerns are raised.

Notwithstanding the paragraph above, colleagues should be aware that confidential information placed on MyConcern is not necessarily exempt from a Subject Access Request (SAR). Therefore, care should be taken to ensure that information is as objective as possible in the circumstances, and only information relevant to a particular child is raised in a concern.

## **What to do if you suspect abuse**

If you suspect abuse, a young person confides in you, or a complaint is made to you about any adult or about yourself, it is your duty to report the concern to the Designated Safeguarding Lead (DSL). The DSL for St Hilda's is Miss Melanie Charles (tel: 07502 285 088; mncharles@sthildasbushey.co.uk). Note: if the DSL is not immediately available, a report should be made immediately to a Deputy Designated Safeguarding Lead (DDSL) who will then discuss the matter with the DSL. If the complaint is about a staff member, you should inform the Head of St Hilda's, Andy Kaye, immediately. The Head will then liaise with the DSL. If the concern is regarding the conduct of the Head, you should raise this with the Aldenham Foundation Chair of the Governors.

## **What to do if a young person tells you about abuse by someone else**

- Always stop and listen straightaway. Ask open-ended questions such as 'What happened?' and 'Who was involved?', rather than leading questions such as 'Did X do this to you?'
- Do not guarantee confidentiality. Explain that you will have to report the matter to the DSL so that they can offer help and guidance.
- It is essential a written record of your conversation is made. Best practice (according to KCSIE, 2023) is to wait until the end of the conversation and immediately type up a thorough summary to MyConcern. It may be useful to make brief notes during the conversation, if making notes does not restrict giving the child your full attention. It is important that you record the pupil's words objectively and without judgement. Sign, date and time-stamp your notes.
- Report the matter to the DSL, either directly or via My Concern, and give them your signed notes. (If a child is at immediate risk of harm, you must contact the DSL in person as soon as possible, even if it means arranging emergency cover for a class. This is a top priority.)
- The DSL will inform you if you have any further obligations.
- Should a child be deemed at risk, the DSL will make an initial referral to Children's Social Services immediately. A full referral in any case will be made within 24 hours.
- If you are not happy with the DSL's response, you have the right to refer the matter directly to Children's Services.

Date of next review: September 2024 (or before if necessary due to changes in legislation, statutory guidance or as a result of lessons being learnt from significant incidents).

The School appoints a Designated Safeguarding Lead in charge of safeguarding for the whole school. This appointment is held by Miss Melanie Charles, who is the school's Deputy Head and a member of the school's Senior Leadership Team (SLT). In her absence, the SENDCo, Mrs Cheryl Rosenthal, and the Head, Mr Andy Kaye, act as deputy DSLs (DDSLs) for the whole school. Mrs Rosenthal is a member of the school's Senior Management Group and Mr Kaye is a member of the school's Senior Leadership Team. Miss Charles, Mrs Rosenthal and Mr Kaye have Level 3 safeguarding training which is updated as per statutory guidance every 2 years and have the requisite seniority and status in the school to deal with allegations of a very serious nature, including those against other SMT and SLT members. In the event of the DSL and DDSLs not being available, they will make every effort to be available for consultation via MS Teams.

Any concerns about a member of staff should be reported direct to the Head in the first instance.

## **4. Important contacts**

### **School Safeguarding Team**

#### **Designated Safeguarding Lead (DSL):**

Miss Melanie Charles

07502 285 088

020 8950 1751

mncharles@sthildasbushey.co.uk

#### **Deputy Designated Safeguarding Leads (DDSLs):**

Mr Andy Kaye (Head):

07976 619 173

020 8950 1751

Mrs Cheryl Rosenthal (SENDCo):

020 8950 1751

croenthal@sthildasbushey.co.uk

Counselling Manager

Mrs Debbie Love

counselling@aldenham.com

Aldenham School Health Centre

07785 303555

### **Foundation Governor Contacts**

#### **Designated Governor for Safeguarding:**

Dr Jane Hawdon

Contact via School Office

#### **Chair of Governors:**

Mrs Sarah Altman

chair@aldenham.com

### **Useful external agencies for students and families**

Hertfordshire Contact Centre

0300 123 4043

County Council Children's Services

Hertfordshire Single Point of Access

0800 6444 101 or 111 and select option 2

24/7 Mental Health Helpline

Childline, UK

0800 1111

NSPCC, UK

0808 800 5000

Samaritans National Helpline

116 123

Confidential Anti-Terrorism Line

0800 789321

Watford Sexual Health Clinic

0300 008 5522

### **Useful external agencies for staff**

Pupils at St Hilda's have homes in a number of different Local Authorities, each of which has its own safeguarding teams and procedures. To determine which local authority a student is resident in, staff can use iSAMS (the school's Management Information System) to locate a permanent address and search the postcode using [www.gov.uk/report-child-abuse-to-local-council](http://www.gov.uk/report-child-abuse-to-local-council). Incidents involving staff should be referred to Hertfordshire County Council. Referrals should always be made to the appropriate local authority.

In Hertfordshire, the Hertfordshire Safeguarding Children Partnership brings together Police, Probation, Health Visiting and Children's Services staff, working together as a team, to share



information and decision making about the best way to safeguard and meet the needs of vulnerable children in Hertfordshire.

Hertfordshire Safeguarding Children Partnership  
HSCP  
(First response to child making a disclosure) 0300 123 4043  
[Protectedreferrals.cs@hertfordshire.gov.uk](mailto:Protectedreferrals.cs@hertfordshire.gov.uk)

CPSLO Hertsmere and St Albans  
– Child Protection School Liaison Officer Christina Lea  
01992 531907  
[Christina.lea@hertfordshire.gov.uk](mailto:Christina.lea@hertfordshire.gov.uk)

Harrow Local Authority Safeguarding  
Children Board (HSCB) 020 8901 2690

CPSL Admin Support Officer  
– Child Protection School Liaison Officer Joanne Freckleton  
078122 71303  
[Cpsloadmin@hertfordshire.gov.uk](mailto:Cpsloadmin@hertfordshire.gov.uk)

Local Authority Designated Officer (LADO)  
(First response if concerns over adult at school)  
LADO referral form to be sent to: 01992 555420  
[LADO.Referral@herfordshire.gov.uk](mailto:LADO.Referral@herfordshire.gov.uk)

Hertfordshire CAMHS 01438 843322 or 0800 644 4101

Herts Sunflower  
– Hertfordshire Domestic Abuse Hotline 08088 088 088 or 999 in emergency  
[kim@mailpurple.org](mailto:kim@mailpurple.org)

Counter Terrorism Hotline 0800 789 321  
– Prevent advice 01438 735373 or 0800 011

When concerns are raised about an adult at risk who is believed to be vulnerable to radicalisation, a safeguarding referral should be raised. The referral should be forwarded to the Hertfordshire police Safeguarding Adults from Abuse team (SAFA). The referral will then be forwarded to the Channel Coordinator and the Channel protocol will then be followed.

#### SAFA

– Safeguarding Adults from Abuse 0300 123 4042 (for advice)  
-Out of office hours advice from the Hertfordshire 101  
Police Prevent Team, or Hertfordshire Police)

If you are concerned about a child being at risk of abuse and that the School is not handling the issue appropriately, thus exacerbating the risk, you may contact the NSPCC's Whistleblowing Service for advice.

NSPCC Whistleblowing Service 0800 028 0285  
[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Ofsted 0300 1234 666

The Children's Commissioner 020 7783 8330

Signpost Young People's Counselling Service 01923 239495

Alternative Multi-Agency Safeguarding Hubs

Barnet	020 8359 4066
Brent	020 8937 4300
Buckinghamshire	012 9638 3962
Camden Children & Families Contact Service	020 7974 3317
Enfield	020 8379 5555
Haringey	020 8489 4470
Hillingdon	018 9555 6006
Luton	015 8254 7653
Westminster	020 7641 4000

## **5. Statutory guidance:**

### **The Education (Independent School Standards) Regulations 2014, Part 3 7(a)**

The standard in this paragraph is met if the proprietor ensures that –

- (a) arrangements are made to safeguard and promote the welfare of pupils at the school, and
- (b) such arrangements have regard to any guidance issued by the Secretary of State.

- Keeping Children Safe in Education (Sept 2023)
- The Human Rights Act (1998)
- The Education Act (2002)
- The Children Act (2004)
- The Equality Act (2010)
- Working Together to Safeguard Children (2018; updated 2022)
- National Minimum Standards (2022)
- What to do if you're worried a child is being abused: guidance for practitioners (2015)
- Information Sharing – Advice for practitioners providing safeguarding services to vulnerable children, young people, parents and carers (2018)
- Statutory framework for the Early Years Foundation Stage (2023)
- Prevent duty guidance for England and Wales (2021)
- Female genital mutilation: resource pack (2023)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK council for child internet safety, (UKCCIS) 2016)
- Sharing Nudes and Semi-Nudes – Responding to incidents and safeguarding children and young people, (UKCCIS) 2020))
- Child Sexual Exploitation: definition and guide for practitioners and annexes (2017)
- DBS barring referral guidance (2018, updated 2023)
- Relationships and Sex Education (RSE) and Health Education Guidance (2019)
- DFE guidance on Sexual Violence and Sexual Harassment (SVSH), (September 2021) (subsequently incorporated into KCSIE)
- Preventing Youth Violence and Gang Involvement (March 2015)
- Home Office County Lines Guidance (May 2022)
- DFE: Mental Health and Behaviour in Schools (November 2018)
- National Police Chiefs' Council: When to Call the Police (2020)
- PHE: Promoting children and young people's mental health and wellbeing (2021).
- The Public Sector Equality Duty (2011)
- Meeting digital and technology standards in schools and colleges (2022, updated 2023)
- The Equality Act 2010 and schools guidance (2014)

When paying due regard to this guidance, colleagues must take account of any particular circumstance or context of the school which may indicate a need for protocols greater than the minimum legal requirements.

## **6. Supporting Documents:**

The safeguarding policy is one in a series of policies and guidance notes which relate to safeguarding. This should be read in conjunction with:

- Acceptable use of ICT Agreement for Pupils
- Attendance Policy
- Anti-bullying Policy
- Behaviour Policy
- Bereavement and Loss Policy
- Educational Visits Policy
- E-Safety Policy
- Equal Opportunities & Dignities at Work Policy
- First Aid Policy
- Health and Safety Policy
- Intimate Care Policy
- Low-level Concern and Allegations Policy
- Medical Conditions at School & EYFS Policy
- Pastoral Care Policy
- Physical Intervention and Restraint Policy
- PSHE Policy
- Relationship and Sex Education Policy
- Recruitment Policy
- Relationships and Sex Education Policy
- SEND Policy
- Staff Code of Conduct
- Supervision Policy
- Uncollected Child Policy
- Use of Cameras and Mobile Phones Policy
- Visitor Policy
- Volunteer and Work Experience Policy
- Whistleblowing Policy

St Hilda's follows the procedures established by Hertfordshire Safeguarding Children Partnership and is in accordance with locally agreed multi-agency procedures.

## **7. Role of the School Governors**

This policy has been authorised by the Governors, is addressed to all members of staff and volunteers and is available on the school website and to parents via MySchoolPortal (MSP) and on request. It applies wherever staff or volunteers are working with pupils even where this is away from the school, for example, at an activity centre or on an educational visit.

Governors ensure that:

- The DSLs and DDSs have undertaken appropriate training in child protection and inter-agency working.
- Members of the school's SLT are fully conversant with statutory guidance including Keeping Children Safe in Education (KCSIE September 2023).
- Members of the Governing Body have all undertaken appropriate safeguarding training.
- The safeguarding policy and procedures are consistent with Hertfordshire Safeguarding

Children Partnership (HSCP) requirements and are reviewed annually and made available to families, staff and pupils.

- The school has procedures in place to deal with allegations of abuse made against members of staff and volunteers, including allegations made against the Head.
- The school has appropriate filtering and monitoring systems in place which are regularly reviewed to determine effectiveness; and all staff, including SLT, understand the provisions in place and manage them effectively.
- The school operates safer recruitment procedures which include statutory checks on the suitability of all staff and volunteers to work with children.
- The school carries out S128 checks on all new members of the Senior Leadership Team.
- The school has in place a training strategy that ensures all staff receive appropriate safeguarding training, which includes initial training before any contact with children (or as soon as is practicably possible thereafter), refresher training and updates at least annually. As part of the regular safeguarding Level 1 training given to all staff and volunteers, they will also receive regular updates in line with HSCP advice to include Prevent and e-safety plus informal updates when needed.
- The DSL and DDSs receive refresher training every 2 years and Prevent training every 3 years (in line with HCSP guidance).
- The school makes all volunteers and temporary staff aware of safeguarding arrangements via a leaflet containing essential information and a verbal briefing when they first report for duty.
- A member of the governing body (normally the Chair) is nominated to be responsible for liaising with the local authority in the event of an allegation being made against the Head.
- Members of the Governing Body are all aware of their obligations under the Human Rights Act (1998), the Equality Act (2010) and their local multi-agency safeguarding arrangements.

## **8. Safer Recruitment**

All school appointments are subject to safer recruitment guidelines. The Head, the Deputy Head, the Head of the Nursery and the Assistant Bursar are trained in safer recruitment. All interview panels will have at least one member of staff trained in safer recruitment.

As part of the shortlisting process, an online search must be carried out on candidates to help identify any incidents or issues that have happened and are publicly available which the interviewer may want to explore with the applicant at interview. Shortlisted applicants will be notified that online searches may be done as part of due diligence checks.

Appointments are not made without suitable checks and evidence including criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information. All such information is stored on the Single Central Register.

For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity.

In summary, a person will be considered to be engaging in regulated activity if as a result of their work they:

Will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engage in intimate or personal care or overnight activity, even if this happens only once.

For all other staff who have an opportunity for contact with children who are not engaging in regulated activity, e.g. on-site contractors, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.

A **supervised** volunteer who regularly teaches or looks after children is not in regulated activity.

For more information please refer to the Aldenham Foundation Recruitment Policy and KCSIE 2023.

## 9. Duty of Care

The Children Act (2004) places a “Duty of Care”:

- On the school in respect of a risk or perceived risk of significant harm to a child.
- On a Head of an independent school to report to a local social services department any evidence or suspicion of children being or at risk of being abused.
- On all members of staff to report to his/her manager the same evidence or suspicion.

In the document *Working Together to Safeguard Children* (2018; updated 2022) and KCSIE (2023) our role as a school is clearly set out and our statutory duty is made clear. All staff working directly with children will read KCSIE Part 1 and Annex B, and those not working directly with children will also read Annex A annually.

All staff will complete an online assessment to ensure they have understood the contents.

Sections 175 and 157 of the Education Act 2002 places a duty on independent schools to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils at the school.

KCSIE (September 2023, Sections 51 to 57) states:

Staff working with children are advised to have an attitude of ‘it could happen here’ where safeguarding is concerned, even if no direct disclosure has been made by a child. When concerned about the welfare of a child, staff should always act in the best interests of the child [para. 51].

If staff have any concerns about a child’s welfare, they should act on them immediately. See Appendix B for a flow chart [copied from p22 of KCSIE] setting out the process for staff when they have concerns about a child [para. 52]

If staff have a concern, they should follow their own organisation’s child protection policy and speak to the Designated Safeguarding Lead (or DDSL). [para. 53]

Options will then include:

- Managing any support for the child internally via the school or college’s own pastoral support processes;
- An early help assessment; and,
- A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm. [para. 54]

Staff are aware that children can be at risk or harm inside and outside of their home, at school and online and know what to look for to identify children who need help or protection. The DSL or a DDSL should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being

taken. Staff should consider speaking to a member of the Senior Leadership Team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible. [para. 55]

**If anyone other than the Designated Safeguarding Lead makes a referral, they should inform the Designated Safeguarding Lead as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming. The online tool *Reporting child abuse to your local council* directs staff to their local children's social care contact number.**

St Hilda's will make all reasonable attempts to ensure that, where facilities are let out to external organisations such as community groups or sports clubs, appropriate safeguarding arrangements are in place. This will necessitate each organisation's safeguarding policy being inspected, and the identity and contact information pertaining to the organisation's safeguarding officer being ascertained.

In accordance with Section 11 of the Children Act (2004), Teachers' Standards (2011) and KCSIE (2023), the school has in place arrangements that reflect the importance of safeguarding and promoting the welfare of children. These include:

- Appointing a designated professional lead for safeguarding (referred to as the DSL).
- A clear line of accountability for the provision of services designed to safeguard and promote the welfare of children.
- A clear commitment by senior leadership to the importance of safeguarding and promoting children's welfare including appointing a governor to take leadership responsibility for safeguarding arrangements.
- Promoting a culture of listening to children and taking account of their wishes and feelings.
- Engendering a culture of "professional curiosity" amongst staff with regard to possible causes of changes in the behaviour or conduct of children.
- Making arrangements which set out clearly the processes for sharing information with other professionals and the HSCP.
- Providing appropriate supervision and support for staff including undertaking safeguarding training and so ensure that staff are competent to carry out their responsibilities for safeguarding, promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- Providing staff with mandatory induction training including familiarisation with Child Protection Procedures and subsequent reviews and updates to all staff, as necessary (minimum update every three years). The induction programme includes familiarisation with the school's Safeguarding policy, staff handbook, Whistle-blowing Policy and KCSIE (Part I) and Annex B or Annex A for those not dealing directly with children. All staff are required to read these and complete a short online assessment to ensure they have understood the contents and the procedures which must be adhered to. In addition, the DSL (Melanie Charles) and DDSLs (Cheryl Rosenthal and Andy Kaye) will be introduced, or will lead the training, and staff will be made aware of how to contact them.
- Using safe recruitment practices in accordance with KCSIE (Sept 2023)
- Providing clear guidelines with reference to Hertfordshire Safeguarding Children Partnership (HSCP) and relevant Local Authorities, in accordance with locally agreed interagency procedures, for dealing with allegations against staff. Allegations may relate to a person who works with children who has:
  - Behaved in a way that has harmed a child or may have harmed a child.
  - Possibly committed a criminal offence against or related to a child.

- Behaved towards a child or children in a way that indicated they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Involving the Local Authority Designated Officer (LADO) in the management and oversight of individual cases (the LADO should be informed within 24 hours of all allegations that come to the school's attention or are reported directly to the police.)
- Making referrals to the Disclosure and Barring Service (DBS) if an individual (paid or volunteer) is removed from work looking after children because it is deemed that they pose a risk of harm to children.

The documents *Working Together to Safeguard Children* (2018; updated 2022) and *KCSIE* (2023) promote a multi-agency approach to the care of children and set forth the good practice of separate agencies co-operating and working together for the benefit of the child.

## **10. Diversity and Inclusion**

St Hilda's is committed to celebrating diversity, actively challenging discrimination and promoting equality of opportunity.

### **Equality Act (2010) and Students with Protected Characteristics**

Recognising obligations under the Equality Act, St Hilda's will never discriminate against students because of a Protected Characteristic. These include sex, race, disability (*including neurodiversity*), sexual orientation, gender reassignment, religion or belief, and pregnancy and maternity. Where appropriate, the school may take proportionate positive action to deal with particular disadvantages affecting students with a Protected Characteristic to better meet their specific needs.

Students with a Protected Characteristic may be at greater risk of harassment or abuse. For example, *KCSIE* (2023) identifies that children with special educational needs and disabilities (SEND) are three times more likely to be abused by their peers. It is important for all staff to be aware that pupils with a Protected Characteristic may not feel ready or know how to tell someone that they are being abused, exploited or neglected as they may feel embarrassed, humiliated or are being threatened. This should not prevent Staff from having a professional curiosity and speaking to the DSL/DDSL if they have concerns about a Student. It is recommended that Staff consider how best to build a trusted relationship with the Student, to better facilitate communication. Staff can speak with the DSL/DDSL if they need support building a trusted relationship with a pupil.

### **Human Rights Act (1998)**

St Hilda's seeks to respect and protect the human rights of all pupils by actively challenging discrimination, harassment, violence and abuse. The school recognises that a failure to respect and protect these rights may breach the European Convention on Human Rights, specifically Article 3 (right to freedom from inhuman and degrading treatment), Article 8 (right to respect for private and family life), Article 14 (rights and freedoms must be protected and applied without discrimination, and Protocol 1, Article 2 (right to education) – all of which are protected by the Human Rights Act (1998).

### **Students who are lesbian, gay, bi or trans (LGBT+)**

The fact a student is LGBT+ is not in itself an inherent risk factor for harm, however, these pupils (and pupils who are perceived to be LGBT+) may be targeted, resulting in child-on-child abuse. This risk is compounded when the pupil lacks a trusted adult with whom they can be open. For

this reason, St Hilda's seeks to provide a safe space for LGBT+ pupils to meet and share any concerns or challenges they may be facing.

## **11. EYFS**

The St Hilda's Safeguarding Policy applies to all pupils including EYFS. With specific reference to EYFS and in accordance with the statutory framework for EYFS 2023 staff must refer and adhere to the Use of Mobile Phones and Cameras Policy of the setting which states that staff, visitors, volunteers and students are not permitted to use their own mobile phones or cameras to take or record any images of Foundation Stage children for their own records during session times. All visitors read this policy as part of the 'signing in' procedure in the Foundation Stage.

Cameras and mobile phones are **prohibited** in the toilet areas. The Intimate Care Policy must also be adhered to.

## **12. Use of school premises**

When facilities are let out to external organisations or individuals (for example, community groups or sports clubs), the school will make all reasonable attempts to ensure that appropriate safeguarding arrangements are in place. Before a third party can use school facilities, their safeguarding policy must be inspected, and the identity and contact information pertaining to the organisation's safeguarding officer be ascertained. Failure to provide this, and any other details required by the Keeping children safe in out-of-school settings: code of practice (2022), will lead to termination of the agreement.

If an allegation is made to the school relating to an incident that happened while school facilities were let out to an external organisation or individual, then the school will follow the Low-Level Concern and Allegations Policy. If necessary, this may include informing the LADO.

When services or activities are provided by the school, regardless of whether the attendees are on the school roll, and are under direct supervision of school staff - this Safeguarding Policy will apply.

In cases when the school arranges for services to be provided by a third party (for example an entertainment provider) the third party individual or organisation must demonstrate it has child protection policies and procedures in place by sharing its safeguarding policy, or similar, with the school.

## **13. The Designated Safeguarding Leads and Deputies**

The Governors approve the job description of the DSL and DDSLs, and ensure they have sufficient time, funding, supervision and support to perform their duties. Safeguarding is an agenda item at every meeting of the Board of Governors and the Education Committee. The Child Protection Governor reports annually to the governors on safeguarding and a minute is kept. Governors understand they have no right of access to information involving any child protection cases within the school or to information involving an allegation against a member of staff unless/until it becomes an internal disciplinary issue. The exception to the above would occur if an allegation was made against the Head. Such an allegation would be referred to the Chair of Governors and they would be required to contact the LADO.

The school appoints a Designated Safeguarding Lead (DSL) and a sufficient number of Deputy Designated Safeguarding Leads (DDSLs) to ensure an appropriate level of provision is maintained



at all times. There are currently two DDSLs in place.

## **The Role of the DSL**

The DSL is responsible to the Head for the following broad areas:

Briefing all school staff (support staff, teaching staff and volunteers), on the relevant contents of the above guidance and procedures, and on the procedures the school should follow below - including the briefing of new staff as part of their induction after arrival at the school.

Receiving reports of alleged or suspected child abuse within the school or reported by a pupil relating to incidents at home or outside the school, contacting the HSCP (or relevant Local Authority) and taking other action in response, as set out below.

Job descriptions for the DSL and DDSL are contained in Appendix D and Appendix E.

## **Managing Referrals**

The DSL will refer all cases of suspected abuse (including child-on-child and non-staff related abuse allegations) to the Hertfordshire Safeguarding Children Partnership (HSCP), or relevant local authority for pupils who reside outside Hertfordshire. The DSL will also liaise with the Police, in consultation with the Head of St Hilda's (and Head of Foundation if appropriate) and Bursar, in cases where a crime may have been committed.

The DSL will refer all allegations against members of staff directly to the Head who will make decisions regarding all low-level concerns, except in the event of the allegation being against the Head, in which case the DSL will communicate directly to the Chair of the Governors without notifying the Head. The Head of Foundation, or Chair of Governors (if an allegation is against the Head), will liaise with LADO, the TRA and the Charities Commission if appropriate.

Allegations against the DSL should be referred to the Head or the local safeguarding board without notifying the DSL.

## **Additional Responsibilities:**

- Ensuring that children on the edge of care (those on a Child Protection Plan or with sufficiently serious intervention from other external agencies) are known to all relevant staff and that their learning needs are catered for appropriately. This includes ensuring that a culture of high aspirations is in evidence for the child(ren) and working with relevant staff (both inside and outside the school) to identify specific challenges the child(ren) may face. The DSL should also liaise with other relevant senior staff to ensure that the overall curriculum followed by a child in this position is tailored to their own situation as precisely as is practicable
- Receiving reports of alleged or suspected child abuse within the school or reported by a pupil relating to incidents at home or outside the school, contacting children's services and taking other action in response, as set out below
- Providing guidance to families, children and staff about obtaining suitable support
- Developing links with relevant statutory and voluntary agencies
- Monitoring and evaluating the effectiveness of the school's Safeguarding Policy and ensuring it is updated at least annually
- Keeping accurate records of all concerns, including a summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome and ensuring that such records are stored securely on the MyConcern safeguarding platform

- Ensuring that when a pupil with a child protection plan leaves the school, appropriate levels of liaison between DSLs occur and the pupil's information is transferred to the DSL at their new school as soon as possible. The details of the recipient of files (date, school, DSL, authority etc.) will be recorded in line with the Retention of Data and Erasure of Personal Information Policy and the DSL will ensure that the child protection file is transferred separately from the main pupil file, either directly via MyConcern or via secure mail
- Liaising with the relevant staff to ensure that the highest possible standards of e-safety are taught and maintained in the school
- Liaising with the Foundation Head of Technology and St Hilda's Computing Coordinator to understand the filtering and monitoring systems and processes in place for the school.
- Working with the police when there are delays in the criminal process
- Working with the local authority on instigating an early help assessment

In addition, the DSL should liaise with the Head to inform them of issues especially ongoing enquiries under section 47 of the Children Act 2004 and police investigations. The DSL should act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

## Training

The Designated Safeguarding Lead (DSL) should:

- Receive appropriate training carried out every two years in order to understand the assessment process for providing early help and intervention.
- Ensure that DDSLs also receive training to the required level.
- Have a working knowledge of how local authorities conduct a child protection initial conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff is aware of and understands the school's safeguarding policy and procedures, especially new and part time staff. This should include:
  - The safeguarding policy and procedures
  - The staff code of conduct
  - The identities and contact details of the DSL and DDSLs
  - The role of the DSL

The St Hilda's SLT will be provided with a copy of KCSIE. All other staff and will be provided with a copy of KCSIE Part I and Annex B (or Annex A as appropriate) and required to confirm that they have both read and understood its contents.

All staff members should receive safeguarding and child protection updates at least annually to ensure they have relevant and current skills and knowledge to safeguard children effectively. Staff should ensure they understand their role in the early help process including identifying emerging problems, liaising with the DSL and DSLs where appropriate, sharing information with other professionals and in some cases acting as the lead professional in undertaking an early help assessment. Staff should also ensure they understand the expectations, roles and responsibilities in relation to filtering and monitoring. Updates may take the form of face-to-face briefings, written briefings and online training modules on a platform such as TES Develop (formally known as EduCare).

Specifically, the DSL should brief all school staff (support staff, teaching staff and volunteers), and as appropriate, prefects and other senior pupils on the relevant contents of the safeguarding policy and on the appropriate procedures to follow in case of a concern - including the briefing of

new staff as part of their induction after arrival at the school.

Governors also undertake full safeguarding training on a 3-yearly basis and are given updates by the DSL on at least an annual basis. They sign to say they have read and understood the contents of KCSIE Part 1 every year. Receiving the appropriate training ensures that the governors have the knowledge and information needed to perform their functions and understand their responsibilities and can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

## Raising Awareness

The DSL should:

- Ensure the school's safeguarding policies are known and used appropriately
- Ensure the school's Safeguarding Policy is reviewed at least annually and the procedures and implementation are updated
- Work with the nominated safeguarding governor to review and update policies and keep them apprised of safeguarding procedures and concerns as appropriate
- Ensure the Safeguarding Policy is published on MySchoolPortal and the school website
- Ensure that families are aware that referrals about suspected abuse or neglect may be made and the role of the school in this process
- Link with HSCP and other Local Authorities to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the school, ensure their safeguarding file is forwarded to any new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file in line with GDPR guidelines
- If children leave the school, and safeguarding concerns were present, and their future educational establishment is unknown – the DSL should contact the relevant Children's Services and the correct Local Education Authority to flag the concern
- The school admissions team request that all feeder schools complete a safeguarding declaration form once pupils have accepted a place at the school, but before they commence their studies. This requires feeder schools to disclose any child protection/safeguarding issues that have arisen while the child is in their care or that the school is aware of from other sources.

The DSL is responsible for holding the school's copy of the current *Local Safeguarding Children Partnership Procedures* and being fully conversant with these procedures. In addition, they should hold and be conversant with the following:

- Keeping Children Safe in Education (2023)
- What to do if you're worried a child is being abused (2015)
- Hertfordshire Safeguarding Children Partnership Child Protection Procedures <http://hertsscb.proceduresonline.com/chapters/contents.html>
- Working Together to Safeguard Children DfE (2018; updated 2022)

## **14. Promoting Fundamental British Values (FBV)**

St Hilda's teaches a broad and balanced curriculum which promotes the spiritual, moral, social and cultural development of pupils and prepares them for the opportunities, responsibilities and

experiences of life. It places great emphasis on the promotion of community cohesion. St Hilda's promotes FBV in many of its day to day interactions with pupils. Examples of this include whole school assemblies, PSHE lessons, talks and presentations, the School Council, Form Time and House competitions.

St Hilda's is a multi-cultural and multi faith school, which aims to:

- Ensure children become valuable and fully rounded members of society, who treat others with respect and tolerance regardless of background
- Promote the FBV of democracy, the rule of law, individual liberty and mutual respect and tolerance for those of different faiths and beliefs
- Promote mutual respect amongst pupils and ensure they are fully prepared for life in modern Britain when they leave school

As a result of this St Hilda's expects pupils to:

- Gain an understanding of how citizens influence decision making through democratic processes
- Recognise that freedom to hold faith and beliefs is protected in law
- Accept that people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated and should not be the cause of prejudicial or discriminatory behaviour
- Recognise the means of identifying and combatting discrimination

Guidance on promoting fundamental British values in schools is available at:  
[www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published](http://www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published).

## **15. Filtering and Monitoring**

### **Overview**

It is essential that pupils are safeguarded from potentially harmful and inappropriate online material. The school recognises that online safety can be categorised into four areas of risk:

Content, (such as racism, misogyny, fake news, radicalisation and pornography).

Contact, (such as peer to peer pressure).

Conduct, (such as making and sending explicit images).

Commerce, (such as online gambling, inappropriate advertising, and financial scams).

Filtering and monitoring helps provide a safe environment for pupils to learn and work online by blocking internet access to harmful sites and inappropriate content and raising any safeguarding concerns related to a pupil's activity on the school network. Filtering and monitoring should not unreasonably impact teaching and learning or school administration or restrict students from learning how to assess and manage risk themselves.

### **Roles and Responsibilities**

The Governor with responsibility for filtering and monitoring will ensure all staff understand the processes in place and that the school reviews the system provision annually.

The Computing Coordinator is responsible for ensuring the school meets the Department of

Education's Digital and Technology Standards (2023). They will:

- provide training to staff on the school processes for filtering and monitoring, and staff responsibilities.
- work with the Foundation Head of Technology to procure filtering and monitoring systems.
- work with the Foundation Head of Technology to document decisions on what is blocked or allowed and why. Any changes to what is blocked or allowed should be explained to the SLT on a termly basis. The Governors should have access to the list of what is blocked or allowed, with reasons as to these decisions.
- work with the Foundation Head of Technology and DSL to review the effectiveness of the system, which should be reported to the Governors on an annual basis.

The DSL should understand the full filtering and monitoring provision and take responsibility for any safeguarding and child protection matters picked up through monitoring. The DSL will:

- triage all monitoring reports to the appropriate DDSL and Form Teacher for further investigation.
- oversee all filtering and monitoring investigations, ensuring records are updated on MyConcern.
- work with the Computing Coordinator to communicate staff responsibilities.
- work with the Computing Coordinator to review the effectiveness of the system, which should be reported to the Governors on an annual basis.

The DDSLs will follow-up any monitoring reports triaged by the DSL with the support of the Form Teacher. They may do this by having a conversation with the pupil to better understand the context of the search or to identify any necessary e-safety education. The DDSL will document the outcome of their investigation on MyConcern.

The Foundation Head of Technology supports the Computing Coordinator in ensuring the school meets the Standards by taking responsibility for the technical aspects of the system. They will:

- work with the service provider to ensure the filtering and monitoring systems are maintained and updated when appropriate.
- work with the service provider to ensure the system provides accurate reports to the DSL.
- identify and report any risks to the system, carrying out checks when necessary.
- work with the Computing Coordinator and DSL to review the effectiveness of the system, which should be reported to the Governors on an annual basis.
- understand the Cyber security standards for schools (2023).

All Staff have a responsibility to report if they:

- witness or suspect unsuitable material has been accessed.
- can access unsuitable material.
- teach topics that could create unusual activity on the filtering logs.
- find a failure in the software or abuse of the system.
- perceive unreasonable restrictions that affect teaching and learning or administrative tasks.
- notice abbreviations or misspellings that allow access to restricted material.

## Systems

St Hilda's utilises Palo Alto Firewalls as a first line of defence against cyber threats. They continuously monitor network traffic, identifying and blocking any unauthorised access or suspicious activities. These firewalls help fortify our system against potential vulnerabilities/ intrusions and block access to inappropriate web content, ensuring that students' data and online presence are protected at all times.

## **16. Prevent**

St Hilda's has a duty of care to both pupils and staff. This includes safeguarding them from the risk of being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The government has defined extremism in the Prevent strategy as: *“vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs”*.

Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and extremist ideas that are part of the terrorist ideology and learn how to challenge these ideas. St Hilda's does not intend to limit discussion of these or other issues related to FBV e.g. democracy, law and government, however, it is mindful of its existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

The Prevent strategy, published by the Government in 2011 and updated in 2019, is part of the overall counter- terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on schools to have “due regard to the need to prevent people from being drawn into terrorism”.

The 2011 Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address

**If staff become aware of activity that could fall within the categories outlined in the Prevent strategy, they must pass the information on to the DSL who will share this with the Head of St Hilda's and Bursar if a referral is made.** The school will then work with the Local Authority to make appropriate referrals to Channel, a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- Identifying individuals at risk;
- Assessing the nature and extent of that risk; and,
- Developing the most appropriate support plan for the individuals concerned.

Further guidance can be found at [www.gov.uk/government/publications/channel-guidance](http://www.gov.uk/government/publications/channel-guidance).

There is no such thing as a ‘typical extremist’ and those involved in extremism come from a range of backgrounds and experiences. A list of indicators is attached as Appendix C to provide support for staff to understand and identify factors that could suggest a child or their family may be vulnerable or involved with extremism. The list of indicators is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people / young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. Over-simplified assessments based upon demographics and poverty indicators have consistently demonstrated to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate

and recruit.

All staff receive training on recognising the indicators of potentially vulnerable children and those who may be susceptible to radicalisation and the associated risks (such as being drawn into extremism or terrorism).

See Appendix C for indicators of vulnerability with regard to extremism.

## **17. Disclosures from pupils**

Pupils who report abuse to a teacher (or other member of staff or volunteer) must be **listened to** and **heard**, whatever form their attempts to communicate their worries may take. You should engage the DSL or a DDSL in this process as soon as is practicable. The following points give guidance on how to deal with a child who makes an allegation or reports an allegation:

- The child must ~~should~~ be listened to but not interviewed or asked to repeat the account
- Avoid questions, particularly leading questions
- The child should not be interrupted when recalling significant events
- All information should be noted carefully immediately following the conversation, including details such as timing, setting, who was present and what was said, in the child's own words. The account obtained should be recorded verbatim or as near as possible
- Care should be taken not to make assumptions about what the child is saying or to make interpretations or decisions about whether or not abuse has occurred
- 'Listened to' means just that; on no account should suggestions be made to children as to alternative explanations for their worries
- Advice or promises must not be given to the child other than the assurance that they have done the right thing in telling you and that you will be passing on their concern to the relevant person
- At all times the child's wishes and feelings must be respected as far as the law allows. Victims should be taken seriously, kept safe and never made to feel that they are creating a problem by reporting abuse, sexual violence or sexual harassment as their children's rights may be breached as set out in the Human Rights Act (1998).
- These notes should be uploaded onto MyConcern as soon as possible after the disclosure
- All evidence (e.g. scribbled notes, mobile phones containing text messages, clothing and computers) must be safeguarded and preserved so they can be passed on to the DSL/DDSL intact
- All actions subsequently taken should be recorded with dates, times and signature. It is particularly important that if a disclosure is logged directly on MyConcern, the date and time of the disclosure is recorded as the time it actually took place rather than the time of it being logged
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report (KCSIE 2023 para 18)
- All staff should be aware that some children may not feel ready or know how to talk about abuse, not recognise their experiences as harmful, or feel embarrassed humiliated or threatened but this should not stop staff from having a 'professional curiosity' and speaking to the DSL if they have any concerns about the child.

N.B The school does not require consent from a family to make a referral to social services but will seek to engage the family in the process unless doing so may put the child at further risk. In this circumstance there would be a discussion with the local authority children's social care team first. The DSL will normally discuss any concerns about a child with their parents or carers in the

event of a suspicion or disclosure.

When it is clear that ongoing support will be required, the DSL/DDSL will ask the pupil if they would find it helpful to have a designated trusted adult to talk to about their needs. The choice of any such adult should be the victim's, as far as reasonably possible.

If you are uncertain about whether or not to be concerned about a child, it is always best to share that information with the DSL/DDSL.

A member of staff or volunteer may come across circumstances where they suspect or observe child-on-child abuse. This may take the form of:

- verbal, physical, emotional abuse
- intimidation or bullying
- sexual abuse

Whilst children and young people who abuse others need to be held responsible for their abusive behaviour, it is also important that whilst being identified, they are responded to in a way that meets their needs as well as protecting others. They may well be children in need or at risk themselves. This sort of concern is to be reported to the DSL/DDSLs in the same way as any other form of abuse or suspected abuse; the Anti-Bullying Policy should also be consulted.

Staff will support children who have witnessed sexual violence and do all and do all they can to ensure the victim, alleged perpetrator and any witnesses are not bullied or harassed. Staff will also be alert to reports of sexual violence and/or harassment that may point to environmental and/or systematic problems or reflect wider issues that can be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.

## Confidentiality

A member of staff or volunteer **must not promise absolute confidentiality**. The child can be assured that whilst you cannot keep an allegation of abuse or suspected abuse to yourself, you will not tell anyone who does not need to know. It is best not to explain procedures in detail to the child but to say that the DSL will have to be told and will decide the next course of action.

## Complaints by a student against a teacher

An initial complaint against a teacher by a student should be referred to the DSL, who will initially investigate the claims where appropriate.

As per the Low-Level Concern and Allegations Policy, if the concern is an allegation (the child has been harmed or may be about to be harmed) the DSL should refer the case to the Head of Foundation.

If the DSL determines the complaint to be a low-level concern in that the member of Foundation Staff has acted in a way that breaks the Code of Conduct, the DSL will follow the process outlined in the Low-Level Concern and Allegations Policy.

Where the complaint does not reach the threshold for a low-level concern, and is directed against a member of teaching staff, the DSL will work with the Head to resolve the complaint.



## Referral Guidelines

Allegations against Foundation staff, volunteers and organisations or individuals leasing school facilities, must be referred to the LADO by the Head, or Chair of Governors (where an allegation is about the Head), within 24 hours of the allegation being made.

Allegations against anyone working or volunteering at the school must be referred to the LADO within 24 hours of the referral being made

If a crime may have been committed, it should be reported to the police in accordance with Working Together procedures. The Head will work with the DSL to make judgements as to whether the child is 'in need' or 'at risk'. Where boundaries are unclear, the DSL will discuss the matter with the LADO (if staff are involved) or the Local Safeguarding Children's Partnership (for example, Hertfordshire's Targeted Advice Service or Brent's MASH team) to seek further guidance.

For example, in the following circumstances the Head or the DSL may take advice from the LADO or children's social care before a decision about making a referral is made:

- The complaint does not involve a serious criminal offence.
- A referral would be contrary to the wishes of the pupil complainant who is of sufficient maturity and understanding and properly informed, or is contrary to the wishes of the complainant's parents (not involving them as perpetrators)
- The case is one that could be satisfactorily investigated and dealt with under the school's internal procedures, the parents being kept fully informed, as appropriate

If the child is deemed to be 'in need', the DSL will discuss with children's services whether to begin early intervention and support using the Common Assessment Framework (or local version if outside Hertfordshire).

If the child is deemed to be 'at risk', the DSL will make a referral under Section 47 of the Children's Act immediately.

## External agencies

Whether or not the school decides to refer a particular complaint to the LADO or the police, the family and students will be informed of their right to make their own complaint or referral and will be provided with the appropriate contact details.

## Mental Health

All staff should recognise that poor mental health can, in some cases, be an indicator that a child has suffered from or is at risk of suffering abuse, neglect or exploitation. Key pastoral staff (e.g. classroom teachers) are in an excellent position to ascertain when the mental health of a child has changed. They should not attempt a mental health diagnosis and must be careful in the use of any specific language used in dialogue with the pupil, such as the term "depression". All children thought to be suffering from poor mental health, low mood or low self-esteem should be referred to the Head or Deputy. They will then liaise with the Foundation's counsellor who will perform an initial diagnosis or will refer to external agencies such as CAMHS for advice. In an emergency, the child should be referred directly to the DSL, who will arrange for emergency care to be provided.

In addition, any suspected or disclosed incidents of self-harm should be logged on MyConcern. If a

pupil requires immediate medical attention, the Health Centre on the Aldenham site must be contacted urgently for assistance.

## **Abuse from use of Electronic Technology**

The era of greater access to and use of mobile technology and the internet exposes young people to previously unforeseen risks of abuse. Occasions of cyber bullying are increasing through the use of networking sites, such as WhatsApp, Facebook, Instagram, TikTok and Snapchat, and also through text and email messaging. People working with young people need to be aware of the risks posed by the use of such media. School policies on Anti-Bullying and Anti-Cyber Bullying should be adhered to as well as staff adopting safe working practices when considering communicating with pupils electronically.

Our students increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education and proved to be vital during the COVID-19 lockdown. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The Prevent duty also requires the school to safeguard vulnerable individuals from being radicalised or drawn into extremism through the internet or social media.

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation; radicalisation; sexual predation - technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate. Online safety training forms part of annual updates to staff and is available via Tes Develop, our online training platform.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

Content: being exposed to illegal, inappropriate or harmful material

Contact: being subjected to harmful online interaction with other users

Conduct: personal online behaviour that increases the likelihood of, or causes, harm

The Pupil's Acceptable Use of ICT Agreement which parents can access via their child's MySchoolPortal page which explains how we try to keep students safe in school and must be signed by both the pupil and parent.

Online safety is a running theme within the whole-school approach to safeguarding and related policies and forms an integral part of the school's E-Safety policy. The school regularly communicates with parents to reinforce the importance of online safety and share information with regard to how their child's learning may involve going online.

Cyber-bullying and sexting by students, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our counter-bullying procedures.

Further guidance on keeping children safe online, particularly during online learning, is available in KCSIE (September 2023), Part Two.

See the relevant DfE advice on **Searching, screening and confiscation**

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

The following measures and policies are in place to promote e-safety within the school:

**Induction and Education:** All pupils are inducted in appropriate use of the school's ICT facilities and other aspects of this policy upon arrival. Subsequently, teachers remind pupils at the start of each academic year about their obligations and code of conduct.

**Monitoring/Filtering:** The school will exercise its right to monitor the use of computer systems, including the monitoring/filtering of internet use, interception of e-mails and the deletion of inappropriate materials at all times.

The SLT and relevant members of staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.

(Factors considered when putting in place these measures, are set out in **UK Safer Internet Centre: appropriate filtering and monitoring. Follow these links for Guidance on e-security and buying advice** for schools.)

In circumstances where the school believes unauthorised use of the computer system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the school reserves the right to inform appropriate authorities and provide documentary evidence.

**Training:** Staff receive advice regarding ICT Code of Conduct, the use of social networking and electronic communication with pupils. Online safety training is integrated into the regular safeguarding training staff undergo and this forms part of the pupils' PSHE and Computing curriculum.

### **Sharing nudes and semi-nudes**

All staff should be aware safeguarding issues can manifest themselves via use of technology in the form of sharing nudes and semi-nudes (colloquially referred to as sexting), often as a form of child-on-child abuse. The accepted terminology was updated by UKCIS in 2020 to reflect current usage by young people.

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. Many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' (Adolescents and self-taken sexual images. Cooper, Quayle, Jonsson, Svedin, 2014).

Creating and sharing sexual photos, livestreams and videos of under 18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management. 'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

See the detailed UKCIS advice on Sharing Nudes and Semi-Nudes on the Resources tab of MyConcern. All staff have all been provided with a one-page summary of this advice, also published by UKCIS.

## Steps to take when dealing with an incident of sexting:

For general concern expressed by a pupil about how sexting may affect them or for information only. This should be for cases where the concern expressed is not specific or related to an alleged incident or disclosure. In this case staff should direct pupils to the following government website [Sex and sexual content online \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk)

If a disclosure is made about an alleged sexting incident by a pupil the following steps should be taken:

- Refer to the one- page summary of how to respond to incidents of sharing Nudes and Semi Nudes circulated to all staff (and available on MyConcern)
- Contact the DSL as soon as possible
- Follow the steps outlined in 'What to do for the recording and reporting of any disclosure' as outlined in the Summary of this Safeguarding Policy.
- If appropriate and with the pupil's permission, take the mobile phone. **Do not view any content.** Place it face down. Turn it off. Place it in an envelope on which you have written: What the envelope contains, the name of the pupil, the date and time. Ask the pupil to sign the envelope over the seal of the envelope to ensure that it cannot be opened and resealed without anyone knowing about it
- Hand the mobile phone to the DSL (or in her absence the DDSL) at the same time as you report your concern.
- The DSL will then interview the pupil(s) concerned, preferably with another member of staff present of the gender of their choice with whom the pupil is comfortable, to ascertain the facts of the incident, such as whether images have been widely shared. The welfare of the child should be paramount at all times.
- If appropriate, the family will be informed in consultation with the student at an early stage and involved in the process to provide the best support, unless there is a good reason to believe that involving them would put the child or young person at risk of harm.
- A referral should be made to children's social care and/or the police **immediately** if there is a concern that the pupil has been harmed or is at risk of immediate harm at any point in the process.
- Once the DSL has made a judgement that it is not appropriate to engage external agencies, the pupil should be given guidance as to how such images should be deleted from the pupil's digital footprint. This must happen without the images being viewed.

The DSL must follow the detailed guidance contained in the UK Council for Internet Safety document [Sharing nudes and semi-nudes: how to respond to an incident \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

## Bullying (Child-on-child abuse)

While bullying between children is not a separate category of abuse or neglect, it is a very serious issue that can cause considerable anxiety and distress. All incidences of child-on-child abuse should be logged on MyConcern and managed by the DSL (or DDSLs) in accordance with the school's Anti-Bullying Policy. If bullying is particularly serious and there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm it could lead to the implementation of child protection procedures.

Child-on-child abuse can take several forms:

- Cyber-bullying, prejudice-based bullying or discriminatory bullying
- Abuse in intimate personal relationships between peers
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise

- causing physical harm
- Sexual violence and sexual harassment (SVSH) or other forms of harmful sexual behaviour – see below
- Consensual and non-consensual sharing of nudes and semi-nudes
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Downblousing (taking photos of a female’s chest without consent)
- Upskirting
- Initiation/hazing type violence and rituals

Staff should recognise that children are capable of abusing their peers. Full reference to this can be found in the school’s Anti-Bullying Policy, which details the following:

- What constitutes child-on-child abuse
- How allegations of child-on-child abuse will be dealt with
- How victims of child-on-child abuse will be supported
- How perpetrators of such abuse will be given support to change their behaviour, in addition to being disciplined as appropriate
- How the risk of child-on-child abuse can be minimized

It is vital that staff are aware of potential incidences of child-on-child abuse, which should never be tolerated or passed off as “banter” or “part of growing up”. Although it is generally assumed that child-on-child sexual abuse is always perpetrated by a male on a female, staff must be open to the possibility of such abuse being male-on-male, female-on-male (particularly if the girl is older), and female-on-female. Incidences of online child-on-child abuse or sexting will be investigated by the school in the first instance to establish the severity. If deemed to meet the threshold that requires it to be reported to the relevant authorities, will then not be further investigated by the school until the authorities have responded.

Staff should recognise that not everyone who has been subject to abuse considers themselves to be a victim or want to be described this way. Staff should consider this when dealing with an incident by using the term the child is most comfortable with. Staff should think carefully about using the term ‘perpetrator’ particularly in front of children with the knowledge that in some cases abusive behaviour can be harmful to the perpetrator too. The school will decide which term is most appropriate on a case-by-case basis.

Child-on-child abuse manifests itself particularly where there are minority groups in an organisation. Particular care should be taken to ensure that such groups are protected as far as possible from majority groups (See KCSIE 2023 Annex B).

### **Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM) and Honour-Based Abuse (HBA)**

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Working Together to Safeguard Children 2018; updated 2022). CSE must always be treated as a form of child sexual abuse.

Child Criminal Exploitation (CCE) may also occur as a result of an imbalance of power. In addition

to age, the imbalance may be due to a range of other factors, including (but not limited to) gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. The experiences of girls who are criminally exploited can be very different to that of boys. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation (KCSIE 2023 para 39).

It is important to note that both CSE and CCE may be perpetrated by:

- Groups or individuals
- People of any gender identity
- Children or adults.

Incidents of CSE and CCE must be investigated very carefully, and it must not be assumed that the alleged perpetrator fits the stereotype of a strong male.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. (See KCSIE 2023 Annex B for further details)

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. All of the above, by definition, constitute abuse, regardless of motivation. If staff have concerns about the possibility of our pupils being subject to HBA these must be reported immediately to the DSL.

All employees of the school have a statutory duty to report cases of FGM involving children directly to the police, rather than via the DSL or Head, who should both be informed immediately once a report has been filed. FGM concerns should be reported to Hertfordshire Domestic Violence/Abuse helpline on 08088 088 088 or in emergency dial 999. FGM concerns in the Metropolitan Police area should be reported via 101.

## **Child-on-child Sexual Violence and Sexual Harassment**

Sexual violence includes, but is not limited to, rape or assault by penetration by one or more perpetrators against a victim or victims. It can also include intentional touching of a sexual nature where consent has not been freely given. (For further guidance, see KCSIE 2023 Part 5). Should staff become aware of a sexual assault having taken place, they must inform the DSL or DDSL(s) as a matter of urgency. If a pupil wishes to disclose details of such an assault, this should be done with **at least** two members of staff present, one of whom should be the DSL/DDSL. Every effort should be made to support the victim and to protect the identity of the alleged perpetrator to ensure that legal proceedings can run their course. The DSL and Head will liaise with the police regarding minimising the risk of a further assault taking place if the alleged perpetrator is still in school. This will involve conducting a written risk assessment.

Sexual harassment includes, but is not limited to, sexual comments, taunting and threatening sexual behaviour. This should be dealt with by the DSL and a record logged on MyConcern. The victim of harassment will be offered appropriate support, such as counselling.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, this cannot be guaranteed and the DSL will have to balance the victim's wishes against their duty to protect the victim and other children. All staff will do all they reasonably can to protect the anonymity of any child involved in any report of sexual violence or harassment and will consider the potential impact of social media in facilitating the spreading of rumors and exposing victims' identities.

Staff should make it clear to pupils that such behaviour is **never** acceptable. The school will emphasise that the law is in place to protect rather than criminalise them, and the importance of understanding intra-familial harms.

KSCIE 2023 (para 446) states that all staff working with children are advised to maintain an attitude of "it could happen here" when considering the possibility of child-on-child abuse occurring. Furthermore, KSCIE 2023 (para 447) states that abuse "should never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys will be boys' as this can lead to a culture of unacceptable behaviors and an unsafe environment for children." It must be stressed that not only boys perpetrate sexual and/or sexual harassment. KSCIE makes it clear that it can occur between "children of any age and sex" (para 447).

The DSL should regularly review case of sexual violence and sexual harassment to see if any distinct patterns emerge. Consideration should then be given to take further preventative measures, e.g. additional teaching time, enhanced staff training or changes to the physical infrastructure to ensure that the risk of further occurrences of inappropriate behaviour is minimised. Even if there are no reported cases of child-on-child abuse, (of any description), it should not be assumed that it is not happening. The school will therefore make it as straightforward as possible for children to be able to report such behaviour.

If, after investigation, it is found that a report of sexual violence or harassment is unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of any help or whether disciplinary action should be taken against the person reporting. This should be done in line with the school's Behaviour Policy.

## **Upskirting and Downblousing**

"Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm" (KCSIE Annex B, 2023). Downblousing is where a photo is taken of a female's chest for the purposes of sexual gratification. Any suspected incidents of upskirting must be reported immediately to the DSL/DDSLs, who will refer the matter to the police as it is a criminal offence. Anyone of any gender can be a victim.

## **Gang Violence**

There are a number of areas in which young people are put at risk by gang activity, both through participation and as victims of gang violence which can be in relation to their peers or to a gang involved adult in their household. A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

For more information on safeguarding children affected by gang violence refer to the following document published by the Home Office.

*'Preventing Youth Violence and Gang Involvement – Practical Advice for Schools and Colleges'*

If you become aware that a pupil is involved in gang activity this should be reported immediately to the DSL who will arrange to meet with relevant staff to decide the best course of action which may involve the police and other outside agencies.

## **County Lines**

St Hilda's proximity to major transport thoroughfares, in addition to the widespread catchment area of its pupils, could make the school a target for the organisers of County Lines. Essentially, these involve coercing young people into transporting drugs and other illegal items from urban areas into provincial towns. Staff should be particularly vigilant in monitoring pupils for indicators such as the following:

- Sudden changes in appearance or dress
- Carrying a second mobile phone
- Unusual anxiety when delayed, e.g. to attend a detention
- Unexplained absences, particularly on Mondays and Fridays
- Unexplained injuries

These are just some of the indicators that a child might be involved in County Lines. Further information can be obtained from the Home Office publication [Criminal Exploitation of Children and Vulnerable Adults: County Line Guidance](#). Suspected involvement in County Lines must be reported to the DSL immediately, who will then liaise with appropriate pastoral staff to protect the pupil(s) from harm.

Staff are aware that serious violence (including that linked to county lines) can put children at risk of harm and become a safeguarding issue.

## **Domestic violence**

The issue of children living with domestic violence is now recognised as a matter for concern in its own right by both government and key children's services agencies. The link between child physical and sexual abuse and domestic violence is high. All the outcomes for children can be adversely affected if they are living with domestic violence and abuse - the impact is usually on every aspect of a child's life. The impact of domestic violence and abuse on an individual child will vary according to the child's resilience and the strengths and weaknesses of their particular circumstances.

Staff should be aware that children under 18 cannot be the direct victims of domestic abuse. However, the impact on their wellbeing is likely to be significant and therefore they should be given as much support as possible.

If staff become aware that a pupil is living with domestic violence the DSL should be made aware and a decision made about the involvement of social services and the police. Our aim is to work with the family alongside outside agencies in the best interest of the child. Although the school is not part of *Operation Encompass*, due to its pupils coming from a wide range of different Local Authorities, it will make every effort to liaise closely with the police and will act immediately on any information being provided by the Police to ensure that a child's welfare is maximised at all times.

## **Impact of abuse**

The impact of abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the



rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long term medical or psychiatric difficulties. In addition, their life chances may be severely curtailed due to the impact on their academic progress during the period of abuse.

### **Good practice:**

Treat all pupils with respect

Set a good example by conducting ourselves appropriately

Encourage positive, respectful and safe behaviour amongst pupils

Be a good listener

Be alert to changes in pupils' behaviour

Recognise the challenging behaviour may be an indicator of abuse

Read and understand the school's Safeguarding Policy and guidance documents on wider safeguarding issues, e.g. bullying, behaviour, code of conduct, restraint

Maintain the appropriate standard of conversation and interaction with and between pupils

Maintain professional standards of pastoral care within the context of appropriate professional separation and avoiding the use of sexualised, derogatory or over familiar language in the company of pupils

Be aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse

### **Children who may be particularly vulnerable**

Some children may be at increased risk. Many factors may contribute to this including prejudice, discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

A vulnerable child should not be left on their own or sent back to lessons; you must make arrangements to stay with the child until an initial assessment of the situation has been made by the DSL or, in his absence, a DDSL. If lesson cover is needed contact the Deputy Head.

Any child at the school who is looked after by the Local Authority must have special attention paid to their needs, including ensuring that their learning is managed as effectively as possible.

Any child at the school with special educational needs or who has a disability must have special attention paid to their vulnerabilities.

To ensure all pupils receive equal protection, it is imperative that staff members pay particular attention to the needs of children who are particularly at risk from abuse, for example:

Pupils:

- With Special Educational Needs and disabilities (because they might not have the communication skills necessary to disclose abuse if it occurs);
- Affected by parental substance abuse;
- Who do not have English as their first language;
- Living away from home, in temporary accommodation or have transient lifestyles;
- Who run away or go missing;
- Who are absent from education for a prolonged period and/or repeated occasion;
- Who are vulnerable to being bullied or engaged in bullying;
- Who are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, sexuality or any other protected characteristic;

- At risk of child sexual exploitation (CSE), prostitution or child trafficking;
- At risk of child criminal exploitation (CCE);
- Are likely to be victims of prejudice based bullying;
- At risk from being brought into County Lines operations; or,
- At risk of forced marriage or female genital mutilation (FGM).

Children with Special Educational Needs and Disabilities (SEND) and those with English as an Additional Language (EAL) are particularly vulnerable and as such can face additional safeguarding challenges and are three times more likely to be abused than their peers. Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENDCo. Staff are aware and mindful that additional barriers can exist when recognising abuse and neglect in children with SEND or EAL. Such barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's disability without further exploration
- Children with SEND or EAL can be disproportionately impacted by things like bullying without outwardly showing any signs or being able to fully express their feelings
- Communication barriers, such as difficulties in articulating how they have been abused and difficulties in overcoming these barriers

The school's Anti-Bullying, Behaviour, Special Educational Needs and Disabilities, English as an Additional Language and Equal Opportunities policies provide additional information on the strategies adopted.

## **Helping children to keep themselves safe**

Children are taught to understand and manage risk through the school's PSHE lessons, assemblies and pastoral input from Form Teachers. The school's approach is to help children think about the risks they may encounter and with staff work out how these risks might be overcome. Being taught to manage risk is a valuable part of a child's education. Children are regularly reminded about safety, e-safety and tackling bullying issues. The school promotes an ethos of respect for children and pupils are encouraged to speak to a member of staff if they have concerns about themselves or others.

Child abuse can be devastating for the child and very distressful for the staff who become involved. The school will support pupils, families and staff by:

- Taking all suspicions and disclosures seriously
- Maintaining confidentiality and sharing information on a need to know basis only with relevant agencies and individuals
- Storing records securely
- Offering details of help lines, counselling and other avenues of external support
- Co-operating fully with relevant statutory agencies

## **Children who run away or go missing**

Occasionally, pupils may run away from home. If any pupil goes missing from school, staff should follow the Missing Pupil Policy. However, sometimes the school may become aware that a pupil ran away from home. In such a case:

- The school should work with the police and family to give any possible assistance in finding the child – such as contacting known friends and searching school buildings and grounds, particularly boarding houses.

- Assuming the child is found, and irrespective of whether the police were involved, the school should still see such an incident as a possible indicator of abuse or a cry for help.

The school should gently investigate the reasons for the child running away – using open questions. If further concerns become apparent, or a disclosure is made at this point, the DSL should make the necessary referrals.

St Hilda's School will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a **continuous period of 10 school days or more**, at such intervals as are agreed between the school and the local authority. (In default of such agreement, at intervals determined by the Secretary of State) see the St Hilda's Missing Pupil Policy.

### **Reporting concerns - allegations against pupils**

A pupil against whom an allegation of abuse has been made, may be suspended from school during the investigation and the school's policy on behaviour, discipline and sanctions will apply. In the instance where there is an allegation of abuse by one or more pupils against another pupil and there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' then any such abuse will be referred to the HSCP (or the relevant Local Authority) as a child protection concern. The expectation is that in this instance all children involved whether perpetrator or victim will be treated as being 'at risk'.

### **Reporting concerns - one to one teaching**

Where pupils are engaged in close one-to-one teaching, particularly in art, drama, dance, music or PE/games lessons, the teacher must ensure another member of staff is in reasonably close proximity within the building and lessons take place within normal working hours. In addition, the activity should be visible (e.g. the door is left open or the window in the door is not obstructed) and any physical touch should be minimal, instructive or confined to necessity in order to avoid harm or risk of injury. If it is necessary to touch a pupil to demonstrate a position/move/technique this should be preceded by an explanation of the manner of touching and assent should be sought e.g. 'I'll need to hold your shoulder to demonstrate this position, is that OK?' **Colleagues should take every possible precaution to avoid placing themselves at the risk of false allegation.**

### **Reporting concerns - suspected harm from outside school**

A member of staff who suspects a child is suffering harm from outside school should seek information from the child with tact and sympathy, using open but not leading questions. A record should be made of the conversation and the matter referred to the DSL or a DDSL if, after the initial conversation, there remains a cause for concern. The school can have a vital role to play in providing information to external agencies in such cases.

## **18. Raising a Low-Level Concern or Allegation**

Safeguarding all members of the Aldenham Foundation community is at the heart of what the Foundation seeks to achieve. To support this, the Foundation encourages staff to discuss with the DSL or Head of Foundation any matters which may have implications for the safeguarding of students involving a colleague, or themselves. These matters can relate to actions taken within the workplace, or where appropriate, outside of the workplace (including online). By doing this, staff help create a culture of openness, trust and transparency.

## **If you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague (including a member of supply staff or a volunteer) towards a pupil or pupils are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount and they have an obligation to raise any concerns without delay. The processes for handling a concern or Allegation about a colleague is outlined in the 'Low-Level Concerns and Allegations Policy'. A copy of the full policy can be found in Appendix F and can be accessed in the Policies and Handbooks section of SharePoint or on MyConcern.

Incidents of inappropriate conduct may not necessarily involve children but could have an impact on a colleague's suitability to work with children. For example, if a colleague was the perpetrator of domestic violence against an adult, it could potentially put children in school in danger due to the concept of transferable risk.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding provision-and that such concerns will be taken seriously by the SLT. In addition, the NSPCC provides a Whistleblowing Advice Line which offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Local procedures plus the government guidance in Working Together to Safeguard Children (2018; updated 2022) and Keeping Children Safe in Education (2023) must be followed at all times.

## **Definition of Low-Level Concern and Allegation**

The distinction between a low-level concern and an allegation is whether the harm-threshold has been met. A low-level concern is one in which the staff member may have breached the staff-code of conduct or acted in an unprofessional way, whereas an allegation is when the staff member's actions have harmed a child, and/or committed a criminal offence, and/or behaved in a way that poses a risk to the child, and/or behaved in a way that suggests they are not suitable to work with children. Allegations must be reported to the Local Authority Designated Officer (LADO) by the Head.

## **How to report a Low-Level Concern**

Where there is concern that someone working on behalf of the Foundation (including Staff, supply-staff, contractors, volunteers and Governors) may have breached the Staff Code of Conduct or acted unprofessionally, a Low-Level Concern must be raised. This can be done using the online system, Confide. All staff receive training on how to access Confide, and can speak with the DSL if they have questions or need support logging a concern. If your Low-Level Concern is regarding the DSL, do not log the concern on Confide and instead contact the Head only. If your Low-Level Concern is regarding the Head of Foundation, do not log the concern on Confide and instead contact the Chair of Governors only.

All Low-Level Concerns raised will be kept securely on Confide while a staff-member is working on behalf of the Foundation, accessible to the Head and Head of Foundation. If multiple concerns are raised, where appropriate, the Head may consider contacting the LADO and following the

processes for an Allegation.

## **How to report an Allegation**

Where an allegation is made against a member of staff (including staff, supply staff, contractors, volunteers, and the Governors) or against someone leasing school facilities, it must be reported immediately to the Head in conjunction with using the online system, Confide. If your Allegation is regarding the Head of Foundation, do not log the Allegation on Confide and instead contact the Chair of Governors only.

All allegations will be referred to the LADO for advice before any investigation takes place and within one working day. In case of serious harm, the police should be informed from the outset.

In order to minimise the risk of harm to children and accusations being made against staff as a result of their daily contact with pupils, governors should ensure, through the Head, that all staff are aware of safe working practice as outlined in the staff Code of Conduct and follow guidelines on their behaviour and actions and the use of control and physical restraint.

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must always be respectful. The school has procedures for dealing with allegations against staff, volunteers and organisations or individuals who lease school facilities, that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from unfounded or false allegations. These procedures follow the guidance in Part 4 of KCSIE 2023.

In addition, all adults working with a child on behalf of the Foundation whether onsite or offsite, and organisations or individuals leasing School facilities, should understand that under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where the former is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a pupil under 18 is a criminal offence. All allegations must be reported straight away to the Head.

If an allegation is made against a teacher, a quick resolution should be a clear priority to the benefit of all concerned. It will be dealt with according to the statutory guidance set out in Part 4 of the KCSIE 2023). At any stage of consideration or investigation, all unnecessary delays should be avoided, notwithstanding the principle of due process.

St Hilda's will not undertake its own investigation of allegations without prior consultation with the Local Authority Designated Officer (LADO) or in the most serious cases the police, in order not to jeopardise statutory investigations. The Head, or the Chair of Governors (where an allegation is made about the Head), will contact the LADO within 24 hours of the allegation. St Hilda's makes every effort to maintain confidentiality and guard against unwanted publicity. The restrictions apply up to the point where the accused person is charged with an offence or the DfE/ Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

In response to an allegation, suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. If suspension is deemed appropriate, the reasons and justification will be recorded by the school and the individual notified of the reasons.

If the LADO or any of the statutory Child Protection authorities decides to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of

staff, the matter will be dealt with in accordance with the Disciplinary Procedure.

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Notwithstanding this, we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Staff will be offered support, such as counselling, during the investigation.

If the school ceases to use the services of a member of staff (or a Governor or volunteer) because they are unsuitable to work with children, a settlement- agreement will not be used and there will be a prompt and detailed report to the DBS and TRA. It is a criminal offence not to report an incident when the criteria have been met. Any such incidents will be followed by a review of the safeguarding procedures within the school with a report being presented to the Governing Body without delay.

Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to and also a referral to the TRA and the Charities Commission. Reasons a referral to TRA would be considered are; “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in *Teacher misconduct: the prohibition of teachers* (October 2015) and DBS barring referral guidance 2018. Further guidance is published on the TRA website.

Where an allegation is raised against a contractor provided by an agency, e.g. a supply teacher, the agency should be fully involved in the referral process.

The school keeps a record of any safeguarding incidents and these are kept in locked storage (Incidents since May 2018 have all been recorded on MyConcern.) The records are kept until the child moves to another school. At this point the records will be passed on to the new school, either via registered post or transfer on MyConcern. St Hilda’s will record where the records have been sent to and the date it happened. The records of the safeguarding incidents will subsequently be treated in accordance with data protection guidelines.

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## **19. Arrangements to fulfil other safeguarding responsibilities**

### **Recruitment**

The school has within its recruitment policy a commitment to establishing and following safer recruitment procedures. The policy is in line with the guidance contained within the document KCSIE 2023.

The school's procedures include the training in safer recruitment for key personnel involved in advertising, interviewing and recruitment. HR Department staff may undertake an online search as part of their due diligence on the shortlisted candidates (KCSIE 2023, para 221) and candidates will be informed. Before taking up a post, all staff and volunteers are required to submit to an enhanced DBS check and also a check on the Children's Barred List and DfE Prohibited List.

Our procedures are in line with the Protections of Freedom Act 2012 and guidance on Disclosure and Barring (June 2018). A copy of the safeguarding policy and procedures are part of the recruitment pack sent to prospective applicants and new members of staff are given training in safeguarding and child protection awareness as part of the induction process. Policies are also held on the use of supply and agency personnel and the school's trips policy covers the requirements for monitoring and checking non-school staff accompanying educational visits.

Clear working practice policies are also in place for staff and the induction period for new staff will make people aware of these policies and how they are to be implemented. Additionally the school has policies covering the use of a missing child policy, an intimate care policy, a whistleblowing policy, a behaviour policy, a Medical Conditions at School & EYFS Policy, an Acceptable use of ICT Agreement and a health and safety policy.

The school has a responsibility to report promptly to the DBS any person (employed, contracted, volunteer or pupil) who has harmed, or poses a risk of harm to a child and who has been removed from working with children, or would have been removed had he or she not left earlier.

## Training and New Staff Training

The DSL and DDSLs will undertake appropriate training in child protection and multi-agency working (updated every two years), in addition to being updated on new guidance and procedures via the weekly NSPCC Update Bulletins and other relevant sources of information.

All staff, will receive Level 1 Safeguarding training every three years in accordance with the requirements of HSCP. School staff were last trained face-to-face in April 2023. Staff are to required to complete an online update training unit at the beginning of each new academic year. New staff, temporary staff and volunteers will be trained either before they start or on their first day (or as soon as possible thereafter) by the DSL or external agency as part of their induction. Staff are reminded annually by the DSL or DDSL about the procedure for child protection and it forms part of the "induction of new staff" programme.

Staff safeguarding training will include reference to dealing with inappropriate relationships – either peer to peer or between pupils and staff, inappropriate use of ICT, staying safe online and how to avoid exploitation via social media. In addition, staff will be provided with guidance on the use of social media in relation to pupils, as contained in the documents 'email guidance for staff' and the 'professional conduct guide'.

Governors will undertake an annual review of the school's safeguarding policy and procedures and the efficiency with which the related duties have been discharged.

New staff will receive the following documents as part of their induction training:

- Safeguarding Policy
- Keeping Children Safe in Education – **either** Part One and Annex B (for members of the SLTs and those working directly with children) **or** Annex B (for those not working directly with children)

- Behaviour Policy
- Anti-Bullying Policy
- Missing Pupil Policy
- Low-level Concern and Allegations Policy
- Social Media Policy
- The relevant Code of Conduct, depending on role.

All staff have read and signed the school staff Code of Conduct. Staff read key policies including the safeguarding policy and KCSIE (2023) Part I and Annex B for those dealing with admissions or directly with children or Annex A for staff not dealing directly with children at the beginning of each academic year and as part of their induction.

## **Monitoring and Evaluation of this policy**

The school monitors and evaluates its safeguarding policy and procedures through the following activities:

- The policy is updated at least annually.
- Governors annually review and sign off the policy (see minutes of Governors' meetings).
- Safeguarding Governor meets with the school's DSL termly and reviews safeguarding throughout the school and Bluebird Nursery.
- Safeguarding is an agenda item at every meeting of the Board of Governors and the Education Committee.
- Safeguarding Governor reports annually to governors on safeguarding and a detailed minute is recorded.
- The Governors approve the job description for the school's DSL and DDSLs, and ensure that they have sufficient time, funding, supervision and support to perform their duties, including access to appropriate counselling if required.
- The Governors monitor the work of the school (through pastoral work, PSHE etc.) in equipping pupils to reduce risks and keep themselves safe.
- The Governors monitor pastoral care in the school to ensure that staff have the skills, knowledge and understanding necessary to keep children safe (including children who are looked after by a local authority).
- The DSL/DDSLS update the SLT on safeguarding issues at the weekly SLT meeting
- SLT monitor and review safeguarding procedures.
- Staff read KCSIE (Sept 2023) Part I or Annex A as appropriate, Safeguarding Policy, Whistleblowing Policy and Staff Professional Code annually and sign to confirm this.
- Attendance data is monitored and reviewed at SLT meetings.
- Risk assessments are regularly analysed in line with the Health and Safety Policy.
- Incidents of bullying/ racial behaviour incidents are regularly reviewed by the SLT.

*This document is to be read in conjunction with the other policies and procedures including KCSIE Part I, Annex A and Annex B (Sept 2023), the Professional Conduct Guide, Whistleblowing Policy, and Anti-Bullying Policy.*



## **20. Appendix A**

### **Signs and Symptoms of Abuse General comments**

Children can be harmed either by deliberate acts or by a failure to provide proper care, or both. Children may suffer neglect, emotional, physical or sexual abuse or a combination of such types of abuse.

Staff should be aware that while abuse of children is more commonly perpetrated by adults, peer abuse can be a safeguarding issue and concerns about bullying or inappropriate behaviour should be referred to the DSL if any of the elements outlined below are manifested. For more details please refer to the Anti Bullying Policy.

A significant deterioration in a child's mental health could well be an indicator of abuse. Staff should therefore take care to ensure they refer a pupil to relevant support personnel (e.g. the Foundation's counsellor) if they are concerned about a pupil's mental health. The mental health professional will then work closely with the DSL if abuse in any form is suspected.

### **Neglect**

Neglect refers to the persistent failure to meet a child's basic physical and/or psychological needs likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs for security, love, praise and recognition. Basic needs, such as food, drink and warmth may not be provided. Slowing of growth without a medical cause may be indicative of emotional abuse and occur even when a child is not deprived of food.

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may also occur alone.

### **Physical Abuse**

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

child.

It is important that a professional who sees an injury on a child takes careful note of how the injury allegedly happened, including the informant, the date, time, place, sequence of events, nature of injury etc. The assessment of the plausibility of the explanation should be a medical judgement - other professionals should not make this decision. Although children do have a variety of accidents, the most common types of injury they sustain are usually different from the injuries caused by abuse.

The following situations, in cases of physical injury, should cause concern about the possibility of physical abuse:

- No explanation
- Inappropriate explanation, e.g. description of a minor accident in relation to a major injury
- Different explanations given to different enquirers
- Parents touchy or defensive, compared with genuine accidents when parents are usually distressed and blame themselves
- Delay in seeking treatment
- Child states that a particular adult hurt them, or one parent accuses another of physical chastisement

Injuries should be a cause of concern as they indicate the possibility of physical abuse because they fit recognisable patterns (e.g. human hand marks, human bite marks). A list of injury types is listed below.

### **Possible Indicators of Physical Abuse**

- Multiple injuries of various types and ages.
- Bruising and skin marks such as:
- Black eyes – these cannot be caused by a fall on a flat surface; two black eyes are particularly suspect, especially if the lids are swollen and tender or there is no bruise to the nose or forehead
- Bruised ears, sometimes with bleeding
- Bruises of upper lip, torn frenulum of upper lip and injuries under the tongue
- Bruising around mouth of child (may have finger bruises: up to three or four on one side and one on the other)
- Flat hand marks, particularly on cheeks, buttocks and lateral thighs.
- Bruises on scalp and "bald patches"
- Finger bruises on shoulders, upper arms or on the trunks or legs of babies
- Linear marks or bruises - often seen on buttocks or backs of thighs
- Bruises or weals curving around the body. Sometimes buckle or loop marks noted
- Bizarre-shaped bruises with sharp borders, e.g. from hairbrush, comb, slipper
- Bruises on abdomen - unlikely to be accidental
- Ligature and choke marks - red mark or bruising around wrist, ankles or neck (in the latter area may be due to sudden pulls on tee shirt)
- Bite mark – two crescent shaped marks or bruises. If more than three centimetres apart they may be caused by an adult or older child
- Human nail marks - these shows piled up skin at the end of the marks and are unlike abrasion from falls on rough surfaces; they may just be linear bruises

## Burns

- Scalds - glove or stocking scalds to hands and/or feet caused by dunking in water
- Scalded buttocks - children cannot scald their buttocks accidentally without also scalding their feet and leg
- Splash marks - look at direction of splash to see if it is compatible with story or might indicate hot liquid being thrown at child
- Cigarette burns - small circular burns most typically on the back of hands or forearms, seen in clusters and often of different ages
- Contact burns - child held against heaters, iron, cookers. Well demarcated burns following contours of hot objects

## Bone and Joint Injuries

- These can be caused by direct blows, twists (from swinging a child round by one limb) or throwing against hard objects

## Poisoning

- Non-accidental poisoning should be suspected in bizarre episodes of ill health or unconsciousness or when poisoning involves more than one child

## Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, upskirting, downblousing, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The vast majority of sexually explicit images of children are user-generated, meaning that children have been coerced into taking explicit photos or videos of themselves.

Children of all ages, boys and girls, can be victims of sexual abuse. This abuse often comes to light in a veiled way, for children are reluctant to tell. Many kinds of sexual abuse do not leave any signs of physical injury.

- Children may try to tell others that they are being sexually abused. They may do this by hinting in words, play or drawings of sexual activities to "test the waters". If the adult response is empathic they may wish to reveal more, but if the response is angry or evasive, they may remain silent and not try again
- If a child exhibits several signs or types of behaviour as listed below, or a pattern emerges of when or how a child exhibits such signs, the possibility of sexual abuse should be considered
- However, it must be emphasised that the behaviour described below are descriptions of some very common conditions of childhood indicating that the child is distressed. Only rarely will they be caused by sexual abuse

## Possible Indicators of Sexual Abuse

- Sudden change in mood or behaviour
- Change in eating patterns: loss of appetite, faddiness or excessive preoccupation with food
- severe sleep disturbance with fears, vivid dreams or nightmares, sometimes with overt or veiled sexual content
- Withdrawal and depression, learning failure, self-injury, suicidal attempts
- Temper, aggression, disobedience and attention-seeking, anxiety or restless behaviour
- Lack of trust in familiar adults
- Girls take over the mothering role in the family whether or not the mother is present
- Absconding; requests to leave home
- Sexualised conduct or inappropriate sexual knowledge in children may be due to direct sexual abuse or other forms of sexual abuse, such as from observing others or watching pornographic videos
- Continual open masturbation, aggressive, inappropriate and explicit drawing and sex play (masturbation and some exploration are a normal part of growing up, but it is the type and persistence of these activities that cause concern)
- Precocious knowledge of adult sexual behaviour
- A boy or girl who behaves in a sexually precocious way or exhibits harmful sexual behaviour
- Requests for contraceptive information. These are rare, but may be a cry for help, as may be anxieties about pregnancy or sexually transmitted disease
- Inappropriate displays of affection, e.g. parent and child behaving more like lovers
- Marked fear of men
- Fear of undressing

Some physical conditions may also be indicators of sexual abuse:

- Difficulty in walking or sitting
- Pain on passing water
- Recurrent urine infections
- Soiling
- Recurrent bed wetting

**NB These conditions are not necessarily definitive indicators of sexual abuse.**

## Specific Safeguarding Issues

KCSIE 2023 Annex B provides a wealth of information regarding specific safeguarding issues. The following situations should be taken as potential causes for concern for the welfare of children.

### Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for a child. If colleagues become aware of this issue, they should seek support from the DSL/DDSLs immediately. Those with pastoral responsibility for children should be particularly vigilant about signs of unease amongst children travelling to, or returning from, international destinations over school holidays.

## **Children and the court system**

Going to court can be an immensely stressful time for children, either as a witness to a crime (or as an alleged perpetrator), or as a party to family court action. The DSL/DDSs should be made aware of children in court for any reason and will seek to liaise closely with CAFCASS (Children and Family Court Advisory and Support Services) and other relevant parties to offer support to the child(ren).

## **Children absent or missing from education**

Colleagues should be aware that children absent from education from prolonged periods and/or repeated occasions, and children missing from education may be engaged in a range of activities which could cause safeguarding concerns. These issues may include (but are not limited to) abuse and neglect, involvement in county lines, or 'honour'-based abuse. Particular attention should be paid to patterns of absence. Colleagues should consult the Missing Children Policy for further guidance.

## **Children with family members in prison**

Children with parents or other family members in prison are more likely to suffer from Adverse Childhood Experiences (ACEs) such as poverty, stigma, isolation and poor mental health. Such children should be supported sensitively by their pastoral managers. Information about parents or other family members in prison must only be shared on a "need-to-know" basis.

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

Involvement in CCE and/or CSE (they often overlap) can have a devastating impact on a child. It must be stressed that age is not the only factor to increase vulnerability; gender, sexual identity, cognitive ability, SEND, physical strength, status within the peer group and access to economic resources can all contribute. Particular attention should be paid to children who are at risk of CCE/CSE due to these or other relevant factors. Colleagues should inform the DSL/DDSs immediately if they become aware of a child's involvement in such activity.

## **County Lines**

Children at St Hilda's could be drawn into County Lines and other gang-related activity due to the school's suburban location and proximity to good transport links. If colleagues suspect such involvement, the DSL/DDSs should be contacted immediately.

## **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. The National Referral Mechanism can be used to refer potential cases of modern slavery to the authorities. Cybercrime Children with very high levels of IT skills can easily be drawn into nefarious activities online. The school's monitoring and filtering systems will protect its network against most attacks, but care should always be taken to ensure that pupils do not engage in such activities. Cybercrime is covered as part of online safety lessons.

## **Domestic abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be the victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

Domestic abuse (DA) can have a huge impact on children. Although DA is committed by one adult against another (or by groups of adults), it should not be assumed that witnessing such events is not deleterious to a child's wellbeing. The school will make every attempt to support such children, whilst maintaining a neutral stance towards the parents (or other perpetrators).

The school will normally be made aware of children living with DA in Hertfordshire via Operation Encompass (OE). Although those living outside the county will not always be contacted in the same manner, the school will put the OE procedures in place and will liaise closely with the relevant police force to ensure the child's best interests are followed.

## **Homelessness**

Although homelessness per se is unlikely within the school community, there may well be children who are vulnerably housed due to reasons such as a family break-up. Such children should be treated with discretion and a referral to Children's Services should be made if their welfare is at risk due to their residential situation.

## **So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

If colleagues suspect a child is the victim of so-called 'honour'-based abuse (HBA), they must report it immediately to the DSL/DDSL. It is important to recognise that all forms of HBA are abuse (regardless of the motivation) and should be treated as such.

Colleagues are made aware that there is a mandatory reporting duty for all incidents of Female Genital Mutilation (FGM), and that this duty lies on the colleague who discovers the practice (either by visual evidence or disclosure by the victim). The DSL/DDSL should, of course, be informed in such circumstances.

It is a crime in England to force someone into marriage, including non-binding unofficial 'marriages' as well as legal marriages. If colleagues become aware of such a crime having taken place affecting a pupil at the school, they should report it immediately to the DSL, or in their absence the DDSL. Even though a victim of Forced Marriage may well give the impression that they entered into an arrangement willingly, the prospect of coercion being used to obtain their consent must never be ruled out.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday. Any concern a pupil may have entered a 'binding' or 'non-binding' marriage before their eighteenth birthday must be reported immediately to the DSL or DDSL.

## **Preventing radicalisation, the Prevent Duty and Channel**

Children are vulnerable to extremist ideology and radicalisation. Extremism, for instance, could include the vocal or active opposition to fundamental British values. Radicalisation is where a person comes to support terrorist groups and terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. Colleagues should be aware of the Prevent Programme and the DSL/DDSL should make a referral as necessary.

Channel is a voluntary programme which seeks to provide support at an early stage to those who are vulnerable to being drawn into terrorism. The school will work closely with the local Channel panel if a pupil is invited to participate; if the pupil subsequently leaves the School, the DSL will liaise with the destination school or college to ensure that the support provided by the Channel programme can continue.

Colleagues, particularly those on the SLT/SMG and the DSL/DDSLs should avail themselves of the additional support on the Home Office website in the form of e-learning modules.

## **Child-on-child abuse**

It is important to recognise that a) children can abuse other children; b) such abuse can happen both inside and outside school, and c) it can happen in a real or virtual environment. Such abuse may involve physical aggression in the form of bullying, sexual violence and sexual harassment (including coercive behaviour) and the sharing of nudes and semi-nudes.

The school should adopt a zero-tolerance approach to such abuse and should offer support to the victim/survivor(s), whilst working with the perpetrator(s) to modify their behaviour.

## **Sexual violence and sexual harassment between children in school**

Sexual violence and sexual harassment (SVSH) can occur between two (or more) children of any age and sex. It can also occur online. Colleagues must adopt the attitude that “it could happen here” and all members of staff should be ready to receive a report of such activity. In all cases, it is essential that all victims/survivors are reassured that they are being taken seriously and that they will be supported and kept safe.

For further details, please see Annex B of KCSIE 2023 or the DfE publication Sexual Violence and Sexual Harassment between children in schools and colleges (2021).

## **Upskirting and downblousing**

Upskirting is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim. Downblousing is where a photo is taken of a female’s chest for the purposes of sexual gratification. It is important that staff remain vigilant of the possibility of upskirting occurring, particularly in stairwells.

## **The response to a report of sexual violence or sexual harassment**

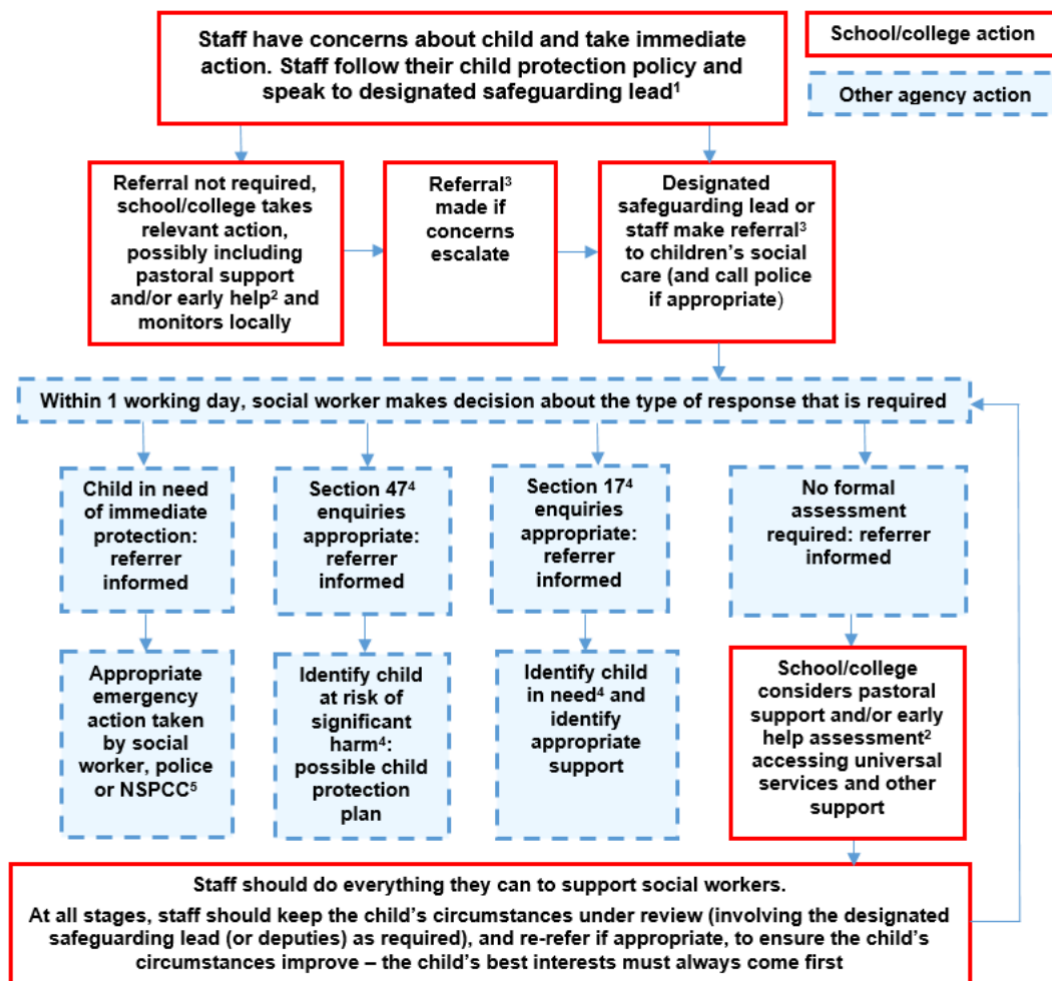
There should be a zero-tolerance approach to any incidence of SVSH. All such incidents should be reported via MyConcern, and cases will be added to the SVSH register (kept by the DSL). A victim must be reassured they are being taken seriously and that they will be supported and kept

safe. No victim should ever be made to feel ashamed for making a report, whether this is to a member of staff or to an external agency such as the NSPCC.



## 21. Appendix B: Flowchart from Keeping Children Safe in Education 2023

### Actions where there are concerns about a child



Taken from Keeping Children Safe in Education, September 2023 © Department for Education

## **22. Appendix C**

Indicators that children or young people may be vulnerable to or involved with extremism.

### **Vulnerability**

Identity Crisis – Distance from cultural/ religious heritage and uncomfortable with their place in the society around them

Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging

Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy

Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life

Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

### **Access to extremism / extremist influences**

Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)

Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.)

Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?

Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?

Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?

Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

### **Experiences, Behaviours and Influences**

Has the child/ young person encountered peer, social, family or faith group rejection?

Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?

Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity

Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?

Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?

Does the child/ young person vocally support terrorist attacks; either verbally or in their written

work?

Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

## **Travel**

Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?

Has the child/young person travelled for extended periods of time to international locations known to be associated with extremism?

Has the child/young person employed any methods to disguise their true identity? Has the child/ young person used documents or cover to support this?

## **Social Factors**

Does the child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?

Does the child/ young person experience a lack of meaningful employment appropriate to their skills?

Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?

Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?

Does the child/ young person have any learning difficulties/ mental health support needs?

Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?

Does the child/ young person have a history of crime, including episodes in prison?

Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?

Does the child/ young person have insecure, conflicted or absent family relationships?

Has the child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?

Is there evidence that a significant adult or other in the child/young person's life has extremist view or sympathies?

## **More critical risk factors could include:**

Being in contact with extremist recruiters

Articulating support for extremist causes or leaders

Accessing extremist websites, especially those with a social networking element

Possessing extremist literature

Using extremist narratives and a global ideology to explain personal disadvantage

Justifying the use of violence to solve societal issues

Joining extremist organisations

Significant changes to appearance and/or behaviour

If you have any concerns discuss them with your DSL and/or local Prevent Officer.

## **23. Appendix D: Designated Safeguarding Lead Job Description**

The person appointed to be the Designated Safeguarding Lead (DSL) fulfils a critical role within the life of St Hilda's School. The DSL has a key responsibility for overseeing the school's safeguarding responsibilities and in assuring the Head, The Head of the Aldenham Foundation and the Governors that all is being done to safeguard the welfare of pupils within the school.

Person Specification:

1. To be an approachable and visible member of the school community who is seen by staff as responsible for this crucial area.
2. To be able to demonstrate to staff the importance of safeguarding as a school community and to give them the confidence to be able to exercise their responsibilities appropriately.
3. To have the appropriate seniority within the school to undertake this responsibility with staff, the leadership team, the governors and outside agencies. (DfE requirements mandate that the DSL is a member of the Senior Leadership Team of the School.)

Job Specification:

1. To offer advice, support and expertise of safeguarding within the school
2. To be a prime and accessible point of contact for any person regarding child safeguarding concerns
3. To liaise closely with teachers, SMG, parents and the Foundation counsellor as appropriate
4. To manage the work of the Deputy Designated Safeguarding Leads (DDSLs) and to provide appropriate support as necessary
5. To be available during the school day and whilst any residential trips are in progress during holidays, or to arrange appropriate cover by the DDSLs as necessary
6. To be responsible for coordinating action regarding referrals by liaising with Children's Social Care Services (CSCS) and other relevant agencies
7. To refer immediately to the Head any allegations against a member of staff
8. To refer immediately to the Chair of Governors any allegation against the Head and ensure s/he consults with relevant authorities
9. To communicate with the various Local Authorities in which St Hilda's pupils are resident and manage referrals as necessary.
10. To maintain suitable safeguarding files in accordance with established procedures and to update them when necessary.
11. To manage MyConcern, the school's safeguarding software package
12. To be responsible for online safety, working with the Head of IT and Communications to ensure that appropriate blocking software is in place and with key pastoral and academic staff to ensure that online safety is taught across the school
13. To liaise with the Admissions Co-ordinator in order to ensure that safeguarding records are transferred from feeder schools, and to ensure that records of pupils leaving the school are transferred appropriately
14. To coordinate The Common Assessment Framework, ensuring its understanding and appropriate completion by any relevant staff
15. To ensure that all staff have access to and are aware of the safeguarding policy and procedures, in addition to the latest version of Keeping Children Safe in Education. The DSL is also responsible for updating such policies in accordance with any changes in legislation.
16. To ensure that all adults within the school are appropriately trained to statutory requirements using outside providers where appropriate and to liaise with the HR Department to ensure that training records are kept up to date.
17. To lead some training of staff on appointment prior to statutory training being undertaken
18. To ensure that they undertake safeguarding training to an advanced standard at least every two years
19. To undertake training of pupils with positions of responsibility within the school
20. To ensure that supply staff and volunteers are provided with a summary of disciplinary and child safeguarding procedures
21. To ensure that pupils receive an appropriate level of education in e-safety

22. To understand the filtering and monitoring system
23. To refer members of the school community to the Channel programme if there is a concern about radicalisation
24. To refer cases to the Police where a crime may have been committed
25. To support staff who make referrals to relevant authorities
26. To ensure that the DBS, TRA and Charities Commission are informed if a person leaves or is dismissed due to harm (or risk of harm) to a child
27. To liaise on a termly basis with the nominated Governor for Safeguarding to monitor procedures and update them on specific issues
28. To assist the nominated Governor in preparation of an annual report on Safeguarding Procedures
29. To prepare reports for Child Protection Conferences and Core Group meetings and to attend such meetings as necessary
30. To ensure that all pupils removed from roll are reported to their Local Authority by the Admissions Registrar

## **24. Appendix E: Deputy Designated Safeguarding Lead Job**

### **Description**

A person appointed to be a Deputy Designated Safeguarding Lead (DDSL) fulfils a very important role within the life of St Hilda's School. The DDSL's primary function is to provide cover for the DSL when he/she is not immediately available and to work under the direction of the DSL to ensure that all is being done to safeguard the welfare of pupils within the school.

Person Specification:

1. To be an approachable and visible member of the school community who is seen by staff as providing expertise in this crucial element of the school.
2. To be in at least a middle management position (or have an equivalent whole-school role) within the school's organisation structure in order to demonstrate an appropriate level of seniority within the school to undertake the responsibilities of providing cover for the DSL.
3. To be an effective team player and to contribute to the wider promotion of good safeguarding practices throughout the school.

Job Specification:

1. To offer advice, support and expertise of safeguarding within the school under the direction of the DSL.
2. To cover for the DSL when she/he is not on school premises during the school day, nor easily contactable by other means.
3. To be a point of contact for urgent concerns during periods outside the school day when the DSL is not immediately available, by mutual agreement with the DSL and other DDSLs. (DfE requirements mandate that the DSL or a DDSL should be onsite during the school day, and available during out of school hours, including school holidays when pupils are on residential trips.)
4. To be available as a point of contact for any person regarding safeguarding concerns.
5. To be part of the core welfare team within the school, liaising with relevant staff and The Foundation's counsellor as appropriate.
6. To provide appropriate support as necessary to the DSL in the fulfilment of her/his statutory duties.
7. To contribute to the production of referrals to Children's Social Care Services (CSCS) and other relevant agencies under the direction of the DSL.
8. To deliver training on safeguarding issues to colleagues as appropriate.
9. To refer immediately to the DSL any allegations against a member of staff. (Note that DDSLs will never be involved in managing allegations against colleagues, unless it is an extreme emergency and the DSL is unavailable.)
10. To ensure that she/he keeps up to date with cases raised on MyConcern, the school's safeguarding software package.
11. To contribute to the revision of the safeguarding policy and procedures, in accordance with any changes in legislation and developments in good practice.
12. To establish contact with new colleagues as soon as possible after appointment.
13. To ensure that she/he undertakes Safeguarding training to an advanced standard at least every two years.
14. To keep abreast of current developments in Safeguarding such as by attending relevant training events and reading e-bulletins on a frequent basis.