

# SAFEGUARDING POLICY AND CHILD PROTECTION PROCEDURES

*This policy refers to both Wellington Senior School and Wellington Prep School*

Nominated Safeguarding Governor	Sarah Merry
Headmaster	Eugene du Toit
Author	Sam Dean – Designated Safeguarding Lead
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This policy will be reviewed annually or according to statutory change or following a review of a safeguarding case.	

## **Child Protection at Wellington School**

### **Key Personnel**

#### **Wellington School – Designated Safeguarding Lead**

Mrs Samantha Dean, Head of Upper School

01823 668709                      [s.dean@wellington-school.org.uk](mailto:s.dean@wellington-school.org.uk)

#### **Wellington Prep School – Designated Safeguarding Lead**

Vics Richardson, Head

01823 668701                      [v.richardson@wellington-school.org.uk](mailto:v.richardson@wellington-school.org.uk)

#### **Wellington Prep School – Designated Safeguarding Lead, Early Years Foundation Stage**

Mrs Rachael Lucas, Head of Early Years

01823 668679                      [r.lucas@wellington-school.org.uk](mailto:r.lucas@wellington-school.org.uk)

#### **Wellington School - Deputy Designated Safeguarding Lead**

Mr Rowan MacNeary, Deputy Head (Pastoral)

01823 668891                      [r.macneary@wellington-school.org.uk](mailto:r.macneary@wellington-school.org.uk)

#### **Wellington School - Deputy Designated Safeguarding Lead**

Mr Nigel Renyard

01823 668890                      [n.renyard@wellington-school.org.uk](mailto:n.renyard@wellington-school.org.uk)

#### **Safeguarding Coordinator (Level 3 trained)**

Miss Jan Kennard, PA to the Deputy Head (Pastoral)

01823 668917                      [j.kennard@wellington-school.org.uk](mailto:j.kennard@wellington-school.org.uk)

#### **Boarding Safeguarding Officer (Level 3 trained)**

Mrs Laura Tabb, Head of Boarding

01823 668810                      [l.tabb@wellington-school.org.uk](mailto:l.tabb@wellington-school.org.uk)

#### **Nominated Safeguarding Governor (Level 3 trained)**

Mrs Sarah Merry

[nsgovernor@wellington-school.org.uk](mailto:nsgovernor@wellington-school.org.uk)

#### **Princess Royal Sports Centre Manager**

Mr Gary Beasley

01823 668718                      [g.beasley@wellington-school.org.uk](mailto:g.beasley@wellington-school.org.uk)

#### **Other staff trained to the same level as the Designated Safeguarding Lead at Wellington School**

Mrs Emily Weiss, HR Director

01823 668836                      [e.weiss@wellington-school.org.uk](mailto:e.weiss@wellington-school.org.uk)

Miss Sarah Middleton, Housemistress (Level 3 trained)  
01823 668639 [s.middleton@wellington-school.org.uk](mailto:s.middleton@wellington-school.org.uk)

Mr Tom Fasham  
01823 668601 [t.fasham@wellington-school.org.uk](mailto:t.fasham@wellington-school.org.uk)

**Headmaster**

Mr Eugene Du Toit  
[headmastersoffice@wellington-school.org.uk](mailto:headmastersoffice@wellington-school.org.uk)

**Chair of Governors**

Ms Anna Govey  
[chair@wellington-school.org.uk](mailto:chair@wellington-school.org.uk)

**External Agencies - Child Protection Contact numbers**

Somerset Safeguarding Children Partnership	0300 123 2224
Somerset Emergency Duty Team (evenings, weekends and bank holidays)	0300 123 2327
Children's Safeguarding Leads Consultation Line	0300 123 3078
Early Help Advice Hub	01823 355 803
Devon Children and Families Partnership	0345 155 1071
Devon out of hours Emergency Duty Team	0345 6000388
Local Authority Designated Officer (LADO) Anthony Goble	0845 3459122
Education Safeguarding Advisor, Support Services for Education Jane Weatherill	01823 355014
Police Safeguarding Coordination Unit <a href="mailto:safeguardingcoordinationunitsouthern@avonandsomerset.pnn.police.uk">safeguardingcoordinationunitsouthern@avonandsomerset.pnn.police.uk</a>	01823 349037
Police non-emergency number	101
Police emergency number (including high risk Prevent enquiries)	999
OFSTED Safeguarding Children (Monday to Friday from 8am to 6pm) <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>	0300 1233155

The Disclosure and Barring Service  
PO Box 181, Darlington, DL1 9FA

01325 953 795

Regional Police Prevent Team  
[channelsw@avonandsomerset.pnn.police.uk](mailto:channelsw@avonandsomerset.pnn.police.uk)

0117 9455 536 or  
0117 9455 539

DI Dickon Turner  
Email: [richard.turner@avonandsomerset.pnn.police.uk](mailto:richard.turner@avonandsomerset.pnn.police.uk)  
Tel: 0117 9455 536                      Mobile: 07823 361635

DS Mandy Pilling  
Email: [Mandy.Pilling@avonandsomerset.police.uk](mailto:Mandy.Pilling@avonandsomerset.police.uk)  
Tel: 01934 638470                      Mobile: 07585 307109

PC Mike Perry  
Tel: 0117 9455 536

Prevent Team - Somerset County Council

Lucy Macready (Chair of the Somerset Prevent Board and Service Manager – Community Safety, Somerset County Council)  
Email: [LMacready@somerset.gov.uk](mailto:LMacready@somerset.gov.uk)  
Tel: 01823 359146                      Mobile: 07887 955440

Prevent Lead - Taunton Deane and West Somerset Borough Council

Scott Weetch  
Email: [s.weetch@tauntondeane.gov.uk](mailto:s.weetch@tauntondeane.gov.uk)                      01823 217560

Anti-terrorist Hotline                      0800 789321

Non-emergency DfE advice                      020 7340 7264  
[counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

NSPCC Whistleblowing Advice Line                      0800 028 0285

Teaching Regulation Agency                      0370 0002288

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## 1. Overview of safeguarding

### Terminology

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

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

#### 1.1 Statement of intent

The safety and welfare of all our pupils at Wellington School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. In all matters relating to child protection the School will follow the procedures laid down by our own (or where appropriate the relevant child's) Local Safeguarding Children Partnership which is Somerset Safeguarding Children Partnership (SSCP) together with DfE guidance contained in *Working Together to Safeguard Children 2018* (as updated) and *Keeping Children Safe in Education September 2019*:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>. The School also has regard to the DfE guidance in *Prevent Duty Guidance: for England and Wales March 2015* (as updated). This policy is applicable to the whole School community, including those pupils in the Early Years Foundation Stage (EYFS).

The School adopts a whole school approach to safeguarding.

All members of staff are trained that they have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy, and to understand that safeguarding and promoting the welfare of children is everyone's responsibility. This includes a duty both to children in need and to children at risk of harm. All staff with direct contact with children must read at least Part 1 and Annex A of KCSIE 2021. Some staff, who do not have face to face contact with children may read only annex A if assessed appropriate by the DSL and approved by the Governors. All school staff should be aware that child protection incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

#### 1.2 Related safeguarding policies

The following policies are available on the School website:

- Anti-Bullying Policy;
- Promoting Good Behaviour Policy
- Staff Code of Conduct;
- Supervision of Pupils Policy;
- Safer Recruitment Policy;
- E-Safety Policy;
- Whistleblowing Policy;
- Trips and Expeditions Policy;
- Health and Safety Statement of Intent;
- Visitors Policy;

- Prevent Strategy.

### 1.3 What is child abuse?

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

The departmental advice: What to do if you are worried a child is being abused - Advice for Practitioners (<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>) should be referred to by all staff in raising their awareness of and helping them to identify the signs of child abuse. The NSPCC website <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/> also provides helpful information on types of abuse and what to look out for which staff are encouraged to refer to.

Annex A of KCSIE 2020 should also be referred to by all senior members of staff and those staff working directly with children. We ensure all that staff read Annex A as part of their induction and ongoing training.

The School recognises the need for early help in all safeguarding concerns.

### 1.4 Other safeguarding issues (including Peer on Peer abuse)

Staff are made aware that safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours linked to drug taking, alcohol abuse, truanting, gender-based violence and sexting also put children in danger. The School recognises that children are capable of abusing their peers. The School will follow guidance set out in Sexual violence and sexual harassment between children in schools and colleges (May 2018)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf) where there is suspected or actual abusive behaviour between peers of a sexual nature, as well as Part 5 of KCSIE 2020.

The School does not tolerate sexting and incidents will be dealt with under the School's Anti-bullying Policy and Safeguarding Policy and Child Protection Procedures. The School also recognises the different gender issues that can be prevalent in peer on peer abuse, for example, girls being sexually touched or boys being subjected to initiation/hazing type violence. All peer on peer abuse will be managed in accordance with this policy. Abuse is abuse and should never be tolerated as 'banter', 'having a laugh' or 'part of growing up'. A bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm and will warrant a response under these



procedures rather than the Promoting Good Behaviour Policies for the Senior and Prep Schools as appropriate.

Police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment, which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. Victims will be reassured that they are being taken seriously and that they will be supported and kept safe.

When there has been a report of sexual violence, the DSL (or Deputy DSL) makes an immediate risk assessment and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment is considered on a case-by-case basis. The risk and needs assessment considers:-

- The victim;
- The alleged perpetrator; and
- The other children (and, if appropriate, staff) at the school.

Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and the alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

Following a report of sexual violence and/or sexual harassment the DSL will consider the appropriate response. This will include;

- The wishes of the victim;
- The nature of the alleged incident;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children;
- If the alleged incident is a one-off or sustained pattern;
- Any ongoing risks;
- Other related issues and context.

Any response and action will, as always, have at the centre the best interests of the child.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Somerset Safeguarding Children Partnership and the Police, if appropriate, on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Somerset Safeguarding Children Partnership, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the

investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from Somerset Safeguarding Children Partnership or Police as appropriate.

Victims and perpetrators of peer on peer abuse will be offered support by the School as appropriate, for example counselling.

## **Mental Health**

Staff are trained to monitor pupils' mental health and understand that poor mental health can be a significant safeguarding concern.

The School employs a Mental Health Lead (mental health social worker) to help support pupils who are experiencing adverse mental health.

The Mental Health Lead provides support and training for staff in how to identify and support pupils with poor mental health and to ensure early intervention.

### **1.5 Early help**

The School recognises the importance of early help. All staff are trained to understand that they must identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. The following is a list of those children who may benefit from early help and may need safeguarding support:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory Education and Health Care Plan);
- Is a young carer;
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or from home;
- Is at risk of modern slavery, trafficking or exploitation;
- Is at risk of being radicalised or exploited;
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- Is misusing drugs or alcohol themselves;
- Has returned home to their family from care;
- Is a privately fostered child;
- Is showing early signs of abuse and/or neglect.

### **1.6 Child's wishes**

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This

is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence.

Staff are trained to:

Receive, Reassure, Respond, Record, Refer:

- RECEIVE what is said by a child in a non-judgmental way; to ask open questions to help the child communicate the issue; to listen carefully to what the child wants, but never promising confidentiality;
- REASSURE the child that they are right to disclose the matter; that their wellbeing is what is most important and that they will be consulted at each step of the process with their permission being sought at each stage where information is to be shared;
- RESPOND to the child with clarity and sensitivity and to explain what will happen next;
- RECORD the conversation with the child in detail, noting time, date place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it and ensuring the facts are recorded only, not opinion;
- REFER - Explain to the child the matter will be referred to the DSL/Deputy DSL within 24 hours.

The School will operate processes with the best interests of the pupil.

If an Early Help Assessment is to be made to Children's Services, the School will seek the permission of the child and the parents, unless it would put the child at risk to do so.

The School will follow Somerset LCSB guidelines, set out in Effective Support for Children And Families In Somerset (Version 2). SOMERSET SAFEGUARDING CHILDREN PARTNERSHIP guidelines state that permission is not a prerequisite for an EHA at Level 4 and 4. However, an EHA should not be made without permission at Level 2 or 3. Full details of SOMERSET SAFEGUARDING CHILDREN PARTNERSHIP guidelines and thresholds can be found at <http://sscb.safeguardingsomerset.org.uk/effectivesupport-documents/>

## **1.7 Transparency**

Wellington School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting Wellington School. Copies of this policy, together with our other policies relating to safeguarding are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the School. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

## **1.8 Boarding school issues**

As a boarding school, there are additional factors to consider with regards to safeguarding set out in the National Minimum Standards. Staff are alert to inappropriate pupil relationships, initiation type behaviours and the potential for peer on peer abuse, particularly if there is a significant gender imbalance.

Boarding staff receive additional induction and safeguarding training tailored to meet their specific, additional duties.

All housemaster/mistresses attend SOMERSET SAFEGUARDING CHILDREN PARTNERSHIPS level 1 training.

The Head of Boarding is trained to the same level as the DSL

### **1.9 Contextual Safeguarding**

The School will take a contextual safeguarding approach to understanding, and respond to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, school staff are trained to have an awareness that social influences beyond the School and family can have a significant effect on pupils and recognise that concerning social influences must be reported and assessed as part of the School's safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of the School's child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

**All** staff are trained in this regard, but especially the designated safeguarding lead (and deputies), who will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

### **1.10 Local safeguarding issues**

The School ensures effective knowledge of local safeguarding issues in the following ways:

- DSL/DDSL monthly attendance at the 'Team Around the School, One Team meetings;
- DSL/DDSLs termly attendance at the Somerset Independent Schools' Safeguarding meeting;

### **1.11 Physical restraint**

There may be circumstances when it is appropriate for staff to use reasonable force to safeguard children. The School's Guidelines on the use of force to control or restrain pupils provides information on this and gives due regard to the Use of Reasonable Force in Schools (DfE July 2013).

### **1.12 Exchange visits – host families (UK) and overseas safeguarding arrangements**

The School facilitates exchange programmes between pupils from Wellington School and schools in other countries. The School will take all reasonable measures to ensure that pupils hosted by Wellington School families in the UK are safeguarded. Likewise, the School will take all reasonable measures to ensure that Wellington School pupils being hosted by an overseas school and its families are safeguarded.

## Host families (UK)

When the School arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related, the responsible adults will be engaging in **regulated activity** for the period of the stay. As the School has the power to terminate the homestay, **the School is the regulated activity provider**. As such, the School will obtain a DBS enhanced certificate with barred list information for all adults within that home. It will be at the School's discretion as to whether it considers it necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the visiting child will be staying.

*Where the child's parent(s) or a student themselves arranges their own homestay, this is a private arrangement therefore the school is not the regulated activity provider.*

## Homestay – suitability of adults in host families abroad

It is not possible for the School to obtain criminality information from the DBS about adults who provide homestays abroad. Where a Wellington pupil is due to be hosted by a partner school's family, Wellington School will establish a shared understanding of, and agreement to the arrangements in place for the visit. Professional judgement will be used to satisfy the School that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents will be made aware of the agreed arrangement. The School will judge whether it is necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible.

### 1.13 Safer employment practices

Wellington School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. *Please also see the School's Safer Recruitment Policy and Staff Code of Conduct.*

In line with Part 3 of the DfE's guidance Keeping Children Safe in Education 2019, the governing board prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff, governors, volunteers and relevant contractors who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring where necessary there is appropriate supervision. Organisations providing contractors or consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.

The School works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

As part of carrying out safe recruitment procedures under KCSIE 2019, members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained

from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Further checks will also include a check for information about any teacher sanction or restrictions that an EEA professional regulating authority has imposed. Those undertaking management posts will be subject to prohibition from management of independent schools checks (please see Safer Recruitment Policy for further details).

All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at School or on another site.

Should the School develop concerns about an existing staff member's suitability to work with children; it will carry out all relevant checks as if the individual were a new member of staff.

This policy is reviewed by governors annually. Please also refer to the School's Safer Recruitment Policy for further details.

#### **1.14 Children potentially at a greater risk of harm**

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

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## **2. Roles and responsibilities**

### **2.1 Raising awareness**

The governors have appointed a liaison governor for safeguarding issues. The role of the Nominated Safeguarding Governor is outlined in Appendix 3 of the Governors' Code of Practice. With regard to the role of the Chair of Governors and Nominated Safeguarding Governor in relation to allegations against staff and volunteers, please see section 5.2 below. The governors, in conjunction with the Designated Safeguarding Lead (DSL), carry out an annual review of the School's safeguarding policy and procedures with day-to-day issues being delegated to the School's safeguarding team in the Senior School and Prep School, which the DSL attends.

The governing board is responsible for

- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay; and
- approving amendments to safeguarding arrangements in the light of changing regulations or recommended best practice.

We recognise that the School plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

### **2.2 Designated Safeguarding Lead (and Deputy DSLs)**

The DSLs for the Senior School, Prep School and EYFS have been fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in Annex B of Keeping Children Safe in Education 2019. The DSLs are members of the senior management team at the Senior and Prep Schools respectively.

The School has Deputy DSLs who are trained to the same level as the DSLs.

The DSLs and Deputy DSLs have job descriptions detailing their role and responsibilities.

The DSLs and Deputy DSLs undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. The DSL and the Deputy DSLs also attend refresher updates at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role. They have a job description for their safeguarding roles and key activities. The DSL role is to ensure that each member of staff has access to, is aware of, and understands the School's safeguarding policy and procedures. Their training meets the requirements of the DfE's Keeping Children Safe in Education 2021. The DSLs have ultimate responsibility for safeguarding and child protection in the School and do not delegate this responsibility.

The main responsibilities of the Senior School DSL and the Prep School DSL are to:

- liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.
- liaise with the School's mental health lead to ensure mental health issues are addressed early and appropriate care is provided
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- be available to discuss concerns about suspected child abuse with staff;
- take responsibility for procedures and referrals;
- act as a focal point for liaison with authorised agencies;
- undertake training as required by the Somerset Safeguarding Children Partnership which includes inter-agency working protocols and training in the Somerset Safeguarding Children Partnership's approach to *Prevent* duties;
- ensure all staff including part-time staff and volunteers who assist with school duties are made aware of child protection issues and receive appropriate training with updates given at least annually;
- support staff involved in child protection cases;
- monitor and evaluate the effectiveness of the School's Safeguarding Policy and Child Protection Procedures;
- report termly to the Governing Board via the designated governor;
- complete the Somerset Safeguarding Children Partnership annual safeguarding audit and report this to the Governing Board;
- attend the Independent Schools' Safeguarding meetings;
- attend local 'Team Around the School' meetings;
- organise, and report on a termly meeting of the safeguarding officers and governor;
- provide routine overview reports on safeguarding arrangements to the Pastoral and Co-curricular and Operations Governors' sub-committees, full safeguarding team meetings and in Management Team meetings

The DSLs and/or the Deputy DSLs can be contacted at any time. All staff have their emergency contact telephone numbers. A duty rota is arranged for holiday periods.

### **2.3 Multi-agency working**

#### **The Somerset Safeguarding Children Partnership**

The partnership is responsible for safeguarding children in Somerset has been redesigned as of 29 September 2019, as part of new arrangements introduced nationally. The statutory changes mean that Somerset County Council is no longer the single lead for co-ordinating safeguarding



arrangements for children, and there is a tripartite responsibility for safeguarding children in the local area.

Three organisations – the Somerset County Council, Avon and Somerset Constabulary and Somerset Clinical Commissioning Group – now have joint and equal responsibility to safeguard children and young people, under the name of the Somerset Safeguarding Children Partnership.

The School recognises the pivotal role it plays in multi-agency safeguarding arrangements and working with the SSCP. The Senior Leadership Team, DSLs and Governing Board will ensure that the School contributes to multi-agency working in line with Working Together to Safeguard Children.

The DSLs maintain close links with Somerset Safeguarding Children Partnership and report each term to the governors on the child protection issues outlined above. The DSLs make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. Parental consent is not required for referral to statutory agencies if this would put a child at further risk of harm.

The DSLs also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against an adult working at the School and/or the police if a criminal offence is suspected.

The DSLs liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children 2018 (as updated) and attendance at strategy meetings. The DSLs work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet.

### **Contacting the Police**

The DSL or DDSL will consider when to contact the police, and they will be the single point of contact from the school to ensure all the relevant information is shared and improve consistency of referrals

When an incident occurs in which a crime has or may have been committed, the School will consider whether to involve the police. Many incidents can be dealt with and resolved internally. The School's Promoting Good Behavior Policy and Safeguarding Policy gives guidance on how to deal with and record such incidents. In making a decision to involve the police, the School will ensure a balance is struck between the needs of the pupils involved and the needs of other pupils and the wider school community. The victim in any incident will be supported and protected as a priority. Those suspected of being the offenders will also be supported. There are often significant circumstances in a young person's life that are contributing factors to an incident and these will be taken into consideration. The seriousness of the incident will be a judgement call for the School. In making this decision the level of harm and the circumstances leading to the incident will be carefully considered.

When the decision is made to report an incident to the police for investigation, due to the seriousness of the incident or for other aggravating circumstances, the School will cease their own investigation, having asked only enough questions to establish the basic facts of the incident. Every effort will be made by the school to preserve any relevant evidence.

Further information on why to call the police can be found here:

[https://www.npcc.police.uk/documents/Children and Young people/When to call the police guidance for schools and colleges.pdf](https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf)

The DSLs receive focused training to support learning and understanding of the ever-changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation and harmful sexual behaviours. The DSLs undertake Prevent awareness training to enable them to provide advice and support to staff on protecting children from the risk of radicalisation. The DSLs' and the School's focus is to support children in need through seeking early help and/or inter agency working, including using the Team around the Child Approach and/or the Common Assessment Framework.

The School's records on safeguarding and child protection are kept securely electronically using 'MyConcern' software. Any hard copy files are kept securely in the Senior School DSLs and Prep School DSLs office as appropriate, and are separated from routine pupil records. Access to all files is restricted to the relevant DSLs and DDSLs, the HR Director, the Prep School Head and the Headmaster as appropriate. All records include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken, decisions reached and the outcome.

### **3. Induction and training**

Every new member of staff, including part-timers, temporary, visiting, volunteers, Governors and contract staff working in the School, receives appropriate information and/or induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or the Headmaster and, if required, to the main points of local procedures of Somerset Safeguarding Children Partnership to which referrals are made or, in certain circumstances, the police. Child Protection training is also given to new governors and volunteers. The School's particular training arrangements for the prevention of radicalisation follow guidance laid out by Somerset County Council; <http://sscb.safeguardingsomerset.org.uk/protocols-procedures-and-reviews/training/>

All staff undertake the Prevent e-learning module as approved by the Home Office. Training in child protection and safeguarding is an important part of the induction process. Induction training includes:

- being provided with hard copies of the following policies, which include:
  - Safeguarding Policy and Child Protection Procedures;
  - Anti-Bullying Policy;
  - Promoting Good Behaviour Policy;
  - Staff Code of Conduct;
  - Whistleblowing Policy;

- KCSIE 2021, Part 1 and Annexe A
- signed confirmation from the individual that policies have been read and an online questionnaire;
- the role and identity of the DSLs and DDSLs;
- where appropriate training will be provided in the use of safeguarding reporting and recording software; 'MyConcern'.

Training also promotes staff awareness of:

- the School's safeguarding response to children who go missing from Education
- child sexual exploitation,
- online safety,
- harmful sexual behaviours including sexual violence and sexual harassment between children.
- Prevent (including referrals to Channel programmes),
- so-called 'honour based' violence,
- forced marriage
- female genital mutilation.

Training on the early help process and process for making a referral to children's social care and for statutory assessment that may follow a referral (including what role they may be expected to play in such an assessment) will also be provided, together with the importance of maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action *without delay* if such a practice is suspected.

It is made explicit to staff that Safeguarding is everyone's responsibility and that all staff should have an 'it could happen here' mentality.

The Headmaster and all staff receive appropriate safeguarding and child protection training which is regularly updated in line with advice from Somerset Safeguarding Children Partnership. In addition, the Headmaster and all staff receive safeguarding and child protection updates as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively. The Headmaster is trained to the same level as the DSL.

#### **4. Staff obligations**

##### **4.1 Staff obligations**

All staff (including supply staff and volunteers) in our School are required to notify the School immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration.

Under the Childcare (Disqualification) Regulations 2009 this applies to those providing early years childcare or later years childcare, including before school and after school clubs, to

children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the HR Director immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the HR Director for more details.

## **4.2 Preventing radicalisation**

We recognise that it is a key role of the School to support children and that school may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils, which may indicate they are at risk of radicalisation and may need help or protection. However, staff acknowledge that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people.

Staff will consider the level of risk to identify the most appropriate referral, which could include referral to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

The Home Office statutory Prevent duty guidance can be accessed on:

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

The Department for Education non-statutory Prevent duty guidance can be accessed on:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Channel General Awareness course can be accessed on the link below:

<https://www.elearning.prevent.homeoffice.gov.uk/channelawareness>

The School recognises that pupils may be at risk of being drawn into terrorism, and carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Headmaster, DSL and Deputy DSL and Nominated Safeguarding Governor to ensure the

School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

Further information can be found in the School's Prevent Strategy.

### **4.3 Visiting speakers**

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

The School is required to undertake a risk assessment before agreeing to a visiting speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances.

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

Visiting speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to show original current identification. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy. Further information can be found in the School's Visiting Speaker Policy.

### **4.4 Children missing from education**

All staff are trained that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff are trained that unauthorised absences and children missing from education is a safeguarding issue and must be reported and treated as such.

Unauthorised absences from school will be managed in accordance with this policy, and with due regard for KCSIE 2021 guidelines.

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. A pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more will be reported to the local authority.

### **Adding or removing a pupil from the School Roll**

## **Pupils joining the School**

The School will notify the local authority within five days when a pupil's name is added to the admission register. The School will provide the local authority with all the information held within the admissions register about the pupil. This duty does not apply to pupils who are registered at the start of the school's youngest year i.e. Year 7 in September, unless the local authority requests for such information to be provided. It does apply however to all other pupils of school age joining the school.

This information is sent electronically here:

[https://secure1.somerset.gov.uk/forms/PortalShowForm.asp?fm\\_formalias=ncj](https://secure1.somerset.gov.uk/forms/PortalShowForm.asp?fm_formalias=ncj)

## **Pupils leaving the School**

The School will also notify the local authority when a pupil's name is to be deleted from the admission register under any of the fifteen grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as amended, as soon as the ground for deletion is met and no later than the time at which the pupil's name is deleted from the register. This duty does not apply where the pupil has completed the school's final year, i.e. Year 11, unless the local authority requests for such information to be provided.

A pupil's name can only be deleted from the admission register under regulation 8(1), subparagraph (f)(iii) or (h)(iii) if the school and the local authority have failed to establish the pupil's whereabouts after jointly making reasonable enquiries. Advice on carrying out reasonable enquiries can be found in the Children Missing Education guidance.

When the school notifies a local authority that a pupil's name is to be deleted from the admission register, the school will provide the local authority with:

- the full name of the pupil;
- the full name and address of any parent with whom the pupil lives;
- at least one telephone number of the parent with whom the pupil lives;
- the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there, if applicable;
- the name of pupil's destination school and the pupil's expected start date there, if applicable; and
- the ground in regulation 8 under which the pupil's name is to be deleted from the admission register.

This information is sent electronically here:

[https://secure1.somerset.gov.uk/forms/PortalShowForm.asp?fm\\_formalias=ncme](https://secure1.somerset.gov.uk/forms/PortalShowForm.asp?fm_formalias=ncme)

The school will highlight to the local authority if they have been unable to obtain the necessary information from the parent, for example in cases where the child's destination school or address is unknown. The Schools will also consider whether it is appropriate to highlight any contextual information of a vulnerable child who is missing education, such as any safeguarding concerns.

The School's Missing Person Policy will be used when a pupil is unexpectedly goes missing from school and cannot be located.

### **Elective Home Education**

Wellington School will notify the Local Authority of whenever a parent or carer chooses to withdraw their child from school to be educated at home. Any concerns about the suitability of home education will be shared with the Education Safeguarding Service. If there are significant safeguarding concerns, appropriate action will be taken to ensure the right support is put in place to keep the child safe.

### **4.5 Emergency Contacts**

The School annually audits pupil/family contact details and parents/guardians are asked to inform the school of any changes to contact details.

In line with SOMERSET SAFEGUARDING CHILDREN PARTNERSHIP guidelines, the School endeavours to have two emergency contacts for each pupil.

### **4.6 Child sexual exploitation**

The School recognises that children who are victims of child sexual exploitation may go missing from education. School staff will be alert to possible indicators of child sexual exploitation and any concerns will be managed in accordance with this policy.

Staff are provided with training in how to recognise CSE and where appropriate in the use of Somerset Safeguarding Children Partnership's CSE Initial Screening Tool.

### **4.7 So-called 'Honour based' violence ('HBV')**

So-called HBV can include forced marriage and Female Genital Mutilation ('FGM'). School staff will be alert to possible indicators of HBV. Guidance on the warning signs of HBV can be found on pages 38-41 of the Multi-agency statutory guidance of FGM (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage (<https://www.gov.uk/guidance/forced-marriage>).

From October 2015, all teachers (along with social workers and healthcare professionals) have a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Headmaster to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing, national, and local protocols. Local safeguarding procedures can be found here:

<http://www.proceduresonline.com/swcpp/somerset/contents.html>

Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate. Information on when and how to make a report can be found at "Mandatory reporting of female genital mutilation: procedural information" (<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>)

The local police non-emergency number is in the contact details section at the beginning of this policy.

#### **4.8 Special educational needs and disability**

All staff are trained to be alert to the specific needs of those pupils who have special educational needs and/or disabilities, including young carers. Those with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Specifically, staff are trained to understand that:

- they must not make assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability (and not a safeguarding concern) and must explore any concerns they have fully;
- these pupils are more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities of being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs is significant;
- communication barriers and difficulties in overcoming these barriers is also a risk factor.

The DSL meets regularly with the Head of SEND and monitors the development and wellbeing of SEND pupils. The School recognises that additional pastoral support is often needed by SEND pupils. This is provided by the SEND department and the pupils' pastoral teams. Pastoral



and academic staff are made aware of the needs of individuals, at staff meetings, via the SEND register and on the school's information management system, iSams.

#### **4.9 LGBTQ+**

LGBTQ+ is not a safeguarding issue, however, children who identify as LGBTQ+ may be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Further information on how the School supports LGBTQ+ pupils can be found in the School's Transequality Policy.

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

Neither staff nor children may use their own mobile phones to take photographs within the School's EYFS setting; nursery and up to Reception year. All mobile phones are stored securely within the EYFS setting during contact time with children (this includes staff, visitors, parents, volunteers and students). Please see the School's E-Safety Policy and Data Protection Policy for the School's policy on taking photographs of pupils outside of these year groups.

#### **4.11 Online safety**

The School recognises that the use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology can provide the platform that facilitates harm. The School's approach to online safety endeavours to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

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; for example, pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example

The School addresses these issues in the following ways:

- appropriate filters and monitoring systems are in place to keep children safe online. The School uses a layered approach to monitor online behaviour. The technologies in use at the School are, Impero Software, Sophos, both of which monitor and filter all online activity on the School network;
- reports are sent to the DSL showing where a user has attempted to access a restricted website or concerning search criteria;
- the systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online

interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm;

- pupils are regularly taught about safeguarding online, through PSHEE, assemblies and workshops;
- the pupil led E-Welfare Committee regularly leads initiatives in raising awareness of online safety;
- staff are equipped with the knowledge to safeguard children online by attending online safety training;
- due consideration is given to what online content is made available to day pupils and boarders and when this is allowed.

### **3G and 4G technology:**

The School understands that many children have unlimited and unrestricted access to the internet through 3G and 4G via their personal mobile devices, both boarders and day pupils.

The school addresses this issue in the following ways:

- the use of mobile devices by pupils up to year 11 is not allowed in school during the school day, with the exception of where a mobile device is being used in class under the instruction of a teacher for educational purposes. This rule applies to boarders and day pupils;
- through the availability of good Wi-Fi in boarding houses, boarders are encouraged to use the School's monitored and filtered, fast and free internet service rather than 3G or 4G.
- We recommend to parents that their child's mobile contract has "parental controls" enabled to help better ensure that their child cannot access harmful material while using the phone or other 3G / 4G device.
- We recommend that pupils are not given 3G / 4G Internet enabled dongles allowing them to browse the internet unrestricted ensuring that the School Internet is used to allow us to better safeguard your child.

The School's E-Safety Policy also sets out the School's approach to online safety.

#### **4.12 Information Sharing**

The School recognises that information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, staff are trained to recognise the importance of information sharing between practitioners and local agencies.

Arrangements are in place to ensure that information within the school is with the three safeguarding partners, other organisations, agencies and practitioners as required.

School staff are trained to be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

## GDPR

Staff are trained to have due regard to general data protection principles when sharing information. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- The School provides secure online software (MyConcern) specifically for staff to record and store safeguarding information
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- The School understands that **The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.**
- The School will refer to the following organisations where guidance regarding the sharing of information is needed:
  - in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
  - at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
  - at [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the department
  - in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

### 4.13 Teaching about Safeguarding

The School ensures it teaches pupils about safeguarding, including online safety. This is delivered through the School's PSHEE programme, Wellbeing programme, the School's pupil led E-Safety Committee as well as special assemblies and lectures.

The School understands its responsibility to teach Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education, and that this is compulsory from September 2020.

The statutory guidance can be found here: Statutory guidance: relationships education relationships and sex education (RSE) and health education.

The School also use the following guidance in developing its programmes:

- DfE advice for schools: teaching online safety in schools
- UK Council for Internet Safety (UKCIS)27 guidance: Education for a connected- world
- National Crime Agency's CEOP education programme: Thinkuknow
- Public Health England: Rise Above

## **5. Child protection procedures**

### **5.1 Procedures for dealing with concerns or suspicions of abuse or neglect**

The School treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our school staff are made aware of their duty to safeguard and promote the welfare of children in the School's care. Staff members are alerted to the particular potential vulnerabilities of looked after children.

The School recognises that there may also be children who, whilst not suffering harm or at immediate risk, require additional support from external agencies. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as children's social care). This may lead to a written plan to support a child in need being drawn up or an early help assessment, such as the Common Assessment Framework, being carried out. In either case, the School will liaise and take advice from external agencies as appropriate.

If a member of staff is made aware of **any** allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth. On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.

Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in School is trained to report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to the DSL and submit an accurate written record of the disclosure or concerns. However, any staff member can make a direct referral to children's social care or other external services such

as early help services in accordance with the referral threshold set out by Somerset Safeguarding Children Partnership.

Where staff have concerns that a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. **Anyone** can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL that a referral has been made as soon as possible. Staff must share information with children's social care and/or the police where there are any concerns that a child may be at risk of harm or neglect.

If staff members are unsure about whether or not a referral should be made, they should speak to the DSL. The DSL will contact the Children's Safeguarding Leads Consultation line for advice or direction. In relation to our nursery/EYFS setting, the School will inform Ofsted as soon as is reasonably practicable, in any event within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

The DSL will refer **all** allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to Children's Social Care within 24 hours, in line with referral thresholds contained within Effective Support for Children and Families (July 2017).

Borderline cases will be discussed with Children's Safeguarding Leads Consultation Line without identifying individuals and following discussions The DSL will judge whether or not an allegation or concern meet the relevant threshold. Children's Social Care will decide in the circumstances what further steps should be taken. This could involve calling the police.

Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where a child's situation does not appear to be improving, the School will follow this up with the children's social care and push for reconsideration where appropriate. Any member of staff who has concerns that a child's situation does not appear to be improving should press for re-consideration.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with social services and the police.

With regard to the Prevent Duty, the School will co-operate with Channel panels and the Police when assessments are being undertaken.

In the case of pupil-on-pupil abuse which the School has reported to Children's Social Care and/or the police and which Somerset Direct and/or the police or statutory child protection authority decides not to investigate further, the matter will be dealt with under the Promoting Good Behaviour Policy, Anti-Bullying Policy and Exclusions Policy, as appropriate, after discussion with Children's Social Care.

Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must firstly raise this with the Headmaster or DSL without delay. The Headmaster or DSL will consult with external agencies, as appropriate in accordance with this policy and the School's Prevent Strategy. Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to children's social care or the police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with children's social care or the police what information can be disclosed.

The DSL will report safeguarding concerns to the Headmaster (provided they do not concern the Headmaster).

For children in need of additional support from one or more agencies, the School's DSL and Deputy DSL are trained to follow Somerset Safeguarding Children Partnership's guidance, 'Effective Support for Children and Families in Somerset', that ensures multi-agency support is requested where concerns meet the appropriate threshold and instigated through an Early Help Assessment which is carried out by the DSL or Deputy DSL with guidance and support from the Early Help Advice Hub.

The School's local authority is Somerset County Council, which operates the Somerset Safeguarding Children Partnership (see contact details on page 3).

## **5.2 Procedures for managing allegations of abuse against staff, volunteers and the Headmaster**

The School's procedures for dealing with allegations against any adult staff member (and volunteers who work with children) aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from vexatious allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

The School will liaise with the LADO, police and social services as to managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Headmaster and DSL) volunteers follows Departmental guidance and Somerset Safeguarding Children Partnership arrangements and apply when staff, including volunteers, have (or alleged to have):

- 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; or
- behaved towards a child or children in a way that indicates he or she 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.

Should the allegation of abuse concern the DSL the member of staff should inform the Headmaster and the Deputy DSL who will act in the place of the DSL. Should the allegation be against the Headmaster or a School governor the DSL will immediately inform the Chair of

Governors without the Headmaster or School governor being informed first. It will be the Chair's responsibility to contact the LADO. Should the allegation be against the Chair of Governors the DSL will immediately inform the Nominated Safeguarding Governor. It will be the Nominated Safeguarding Governor's responsibility to contact the LADO.

If the allegation concerns a member of staff, the Headmaster, or volunteer he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The School will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

The outcome of investigation of an allegation will record whether it is

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

In all other circumstances, a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice. A copy will only be provided to the individual concerned following consultation with appropriate agencies and agreement has been reached as to what information can be disclosed. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references.

If the LADO or any of the statutory child protection authorities decide 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. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children. The School recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.

During the course of the investigation the School in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education 2021 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Allegations against a member of staff who is no longer at the School (including historical allegations) should be referred to the police.

Any pupils who are involved will receive appropriate care.

Staff should also have regard to the Staff Code of Conduct to minimise the risk of allegations being made.

#### Supply teachers, visiting coaches, contractors or volunteers

The School recognises that if an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers, visiting coaches, contractors and volunteers, the School will ensure that allegations are dealt with properly. In no circumstance will the School or college decide to cease to use a supply teacher or a contractor due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Agencies or Businesses providing contracted staff should be fully involved with any investigation and co-operate with any enquiries from the LADO, police and/or children's social care. The school will usually take the lead because Agencies or Businesses do not have direct access to children or other school or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

Wellington School does not use supply teachers however, the term supply teacher is used in this context to indicate a member of staff who is in regulated activity with Wellington School pupils and who is not directly employed by the School. The School will discuss whether it is appropriate to suspend the supply teacher, visiting coaches, volunteer or redeploy them to another part of the school, whilst they carry out their investigation. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the Governing Board when working in the School. They will be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which will be guided by the LADO, will address issues such as information sharing, to ensure that any previous concerns or allegations known are taken into account by the School during the investigation.

### **5.3 Staff suspension following an allegation**

If the LADO or any of the statutory child protection authorities decide 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 and/or Capability Procedure. However, the School recognises that suspension does not constitute disciplinary action and does not itself imply any presumption of guilt on the part of the employee. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children.

If the allegation is found to be false, and the person has been suspended, then the School will support him or her as best it can, perhaps with the provision of a mentor, to return to work, and will attempt to minimise contact with the pupil(s) involved in making the allegation if they remain



at School. The School will consider serious disciplinary action against a pupil who has been found to make deliberately false allegations.

#### **5.4 Whistleblowing**

If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy. Concerns regarding the behaviour of colleagues, which are likely to put pupils at risk of abuse or other serious harm may be dealt with in accordance with 5.2. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feels that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline (tel; 0800 0280285 (8am to 8pm Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)).

#### **5.5 External referrals**

We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Wellington School will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School will consider making a referral to the Teaching Regulation Authority (TRA) as required by sections 141D and 141E of the Education Act 2002 and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

From October 2015, section 5B of the Female Genital Mutilation Act 2003 placed a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the School's DSL and involve children's social care as appropriate.

Should historical allegations of child abuse be made against a teacher who is no longer teaching, the School will, in accordance with Keeping Children Safe in Education 2019, report the matter to the police. Similarly, allegations against a teacher who is no longer working at the School will also be referred to the police. All allegations of historical abuse should be referred to the Headmaster or DSL straight away.

## **5.6 Parents**

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Headmaster who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from Children's Social Care or the LADO as appropriate.

## **5.7 Promoting awareness**

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Promoting Good Behaviour Policy and in enforcing our Anti-Bullying Policy.

Time is allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding.

All pupils know that there are adults to whom they can turn to if they are worried. If the School has concerns about a child, there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- All pupils have access to a telephone helpline enabling them to call for support in private;
- Every child has a school diary and school planner, both of which contain guidance on where to turn for advice;

- Details of confidential help lines and web addresses for external specialists such as ChildLine, Kidscape, Get Connected and the Samaritans and the School's confidential listener are clearly displayed on all house notice boards (boarding and day);
- Our medical centre and all our boarding houses display advice on where pupils can seek help;
- We operate a peer mentoring scheme whereby trained older pupils are encouraged to offer advice and support to younger pupils;
- We provide leadership training to our School and House Captains;
- All senior pupils with positions of responsibility receive training, which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
- Our prefect system (School and House Captains) is regularly supervised by staff, both in a day and boarding context. They have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, School and House Captains are given induction on appointment which includes how to contribute to the School's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse;
- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying, please refer to the School's Anti-Bullying Policy. E-safety to pupils is delivered through PSHEE classes, regular assemblies, workshops and lectures.

## **5.8 Position of trust**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour, which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer the School's Staff Code of Conduct, which is available in the Policies section of the School website.

## **5.9 Records**

All concerns, discussions and decisions (with reasons) made in accordance with this policy will be recorded in writing.

The School uses software called my 'MyConcern' to manage safeguarding record keeping. A paper reporting form can also be used in the event that IT is unavailable for any reason.

## **6. Monitoring and evaluation of this policy**

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

- review of the policy annually or after an incident or change of legislation if sooner at regular safeguarding team meetings and by the School's compliance officer;
- governing board visits to the School;
- frequent scrutiny of attendance data;
- regular analysis of a range of risk assessments;
- regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school;
- frequent scrutiny of governing board meeting minutes;
- logs of bullying and/or racist behaviour incidents are reviewed by the DSL.
- review of parental concerns and parental questionnaires;
- regular review of the use of pupil-specific leisure rooms and clubs at lunchtime and after school;
- regular review of training offered to staff, including e-safety training.

## Appendix 1 – Definitions of abuse (KCSIE 2021)

For further information on the KCSIE definitions of abuse, please read pages 8-10 of Part 1 and Annex A at <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> as set out below:

### Types of abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure they should **always** speak to the DSL or DDSL.

**All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

**Sexual abuse:** 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, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in

preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment, which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or a group of children. Sexual violence are sexual offences under the Sexual Offences act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Safeguarding issues**

**All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (sharing of nudes or semi nudes and/or videos) put children in danger.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in Annex A.

### **Peer on peer abuse**

**All** staff should be aware that children can abuse other children (often referred to as peer on peer abuse). The School takes a zero-tolerance approach, and that even if there are no reported cases, staff must not take the view that it does not happen in this setting. This is most likely to include, but may not be limited to,

- bullying including cyberbullying;
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - sexual violence, such as rape, assault by penetration and sexual assault;
  - causing someone to engage in sexual activity, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
  - upskirting, now a criminal offence, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
  - sexting, or taking and sharing nudes and semi-nude images and/or videos.
- and;
- initiation/hazing type violence and rituals. (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### **Serious Violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence> and its <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

## Female Genital Mutilation

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See Annex A for further details.

## Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#).

## Extra-Familial Harms

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. **All** staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's



social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all of the available evidence and the full context of any abuse.

Additional information regarding contextual safeguarding is available here <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

Annex A of KCSIE 2021 contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff who work directly with children should read the annex in full.

## **Annex A: Further information**

### **Further information on child sexual exploitation**

Child sexual exploitation 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 to be consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. A child may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non- penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;

- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

### **Child criminal exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

### **Child Sexual Exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

The department provide: [Child sexual exploitation: guide for practitioners](#)

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Children are also increasingly being targeted and recruited online using social media.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>103</sup> should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

## Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. Abuse can be direct or indirect (through a child)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'.

Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **Operation Encompass**

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare.

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- SafeLives: young people and domestic abuse.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties:

<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>.

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation, here: <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

## FGM mandatory reporting duty

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Information on when and how to make a report can be found at

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school or college’s designated safeguarding lead (or Deputy DSL) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

## Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance,

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322310/HMG\\_Statutory\\_Guidance\\_publication\\_180614\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf) and Multi-agency

guidelines,

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MULTI\\_AGENCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf), pages 35-36 of which

focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

## **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be part of a schools' or colleges safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

## **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".<sup>110</sup> This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.



There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

## **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at: [Channel guidance](#).

## **Additional support**

The department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

## **Peer on peer abuse**

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; upskirting and initiation/hazing type violence and rituals.

Reporting systems are the same as described in the anti bullying policy and are well promoted, and easily accessible to all the students.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) including peer on peer abuse requires a whole school approach and can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

### **Sexual violence and sexual harassment between children in schools and colleges.**

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is important that staff are aware this type of behaviour can also happen outside of the school setting.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously, offered appropriate support and kept safe. Staff should be aware that some groups are potentially more at risk. Evidence shows that girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### **What is sexual violence and sexual harassment?**

#### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact that children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. . (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

### **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create hostile, offensive or sexualised environment.

### **Whilst not intended to be an exhaustive list, sexual harassment can include:**

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this

- crosses into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - Non-consensual sharing of sexual images and videos;
    - Sexualised online bullying;
    - Unwanted sexual comments and messages, including, on social media;
    - Sexual exploitation; coercion and threats; and
    - Upskirting.

## **Upskirting**

**The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.**

'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. It is a criminal offence. Anyone of any gender, can be a victim.

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

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

## Appendix 2

### 2.1 Child Protection Incident Reporting Form – Senior School

Wellington School Child Protection Reporting Form

Full name of pupil	
Date of incident	
Time of incident	
Place of incident	
Name of member of staff completing this form and position	
Name(s) of other staff present and position(s)	
Date of notification of the DSL or Deputy DSL	

Before proceeding, have you reassured the pupil that you are there to help them but you cannot guarantee absolute confidentiality? Have you explained that you may need to pass the information on to the Designated Safeguarding Lead, Sam Dean (Head of Upper School) who will ensure the correct action is taken?

Yes

No

Ask the pupil to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach to the form

*Ensure you provide as much detail as possible and consider:*

- *What happened and to whom*
- *Where this happened*
- *Names of all individuals involved*

- *Times and dates of incident(s)*
- *Are the pupil's parents/guardian aware – does the pupil want them to be informed?*

Additional notes or evidence

*This may include any concerns you have about signs of abuse, emotional ill-treatment or neglect from outside the School. Please also make a record of any other evidence, such as text messages, written notes, clothing that may relate to this matter.*

Any suspicion or complaint of abuse must be reported to the DSL or Deputy DSL. If the complaint is against a member of staff this should be reported to the Headmaster or in his absence Sarah Merry, the Nominated Child Protection Governor

DO NOT investigate the matter as this could prejudice the investigations of outside agencies. Your responsibility is to report the matter. If you fear the pupil is in immediate harm you should call the police (101 or 999) and/or call Somerset Direct 0300 1232224.

If the concern involves an allegation against the DSL or Deputy DSL, you must report this directly to the Headmaster. If the concern involves an allegation against the Headmaster, you must report this to the Chair of Governors

Please record what action you have taken and when

--

Your full name and position	
-----------------------------	--



Signed	
Date	

***This section is to be completed by the DSL or Deputy DSL***

Detail of decision / action by DSL or Deputy DSL
Reason for this decision by the DSL or Deputy DSL
Notes of feedback between DSL / Deputy DSL and the person who reported the issue

--

Notes of feedback between DSL / Deputy DSL and the person who raised this child protection concern, including date of feedback:

--

Tick to confirm that these notes been added to pupil's chronology and a copy placed in pupil's Child Protection file		Tick to confirm this information has been added to School's Child Protection register	
--	--	---	--

Signed by the DSL or Deputy DSL	
Date	

- Copies of this form are available to staff through this policy on the website and should be used if the myconcern software cannot be accessed.
- This form may be used but a written record must be made following this guidance if the form is not used.
- This form is designed to be completed by any member of staff who receives information raising child protection concerns either through observation or direct disclosure, from a pupil or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received even where this happens away from the School, for example on an educational visit.
- Any disclosure or concern must be reported to the DSL within 24 hours regardless of the completion of this form.
- Do not allow the completion of the form to delay notification of the concerns to the School's DSL but pass the completed form to the DSL, the Headmaster or Chair of Governors as appropriate, as a matter of urgency.

## 2.2 Confidentiality

- The Headmaster or DSL will disclose any information about a pupil to other members of staff on a need to know basis only. All staff have a professional responsibility to share information with other agencies in order to safeguard children.
- Staff cannot promise a child to keep secrets which might compromise the child's safety or welfare or which might implicate others in serious misconduct.
- The School will always undertake to share our intention to refer a child to Children's Services with parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the Children's Safeguarding Leads Consultation Line on this point.
- Personal information will only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 2018, General Data Protection Regulation 2016 and the European Convention on Human Rights, Article 8). Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, obtaining consent may not be possible or in the best interest of the child or young person, e.g., where safety and welfare of that child or young person necessitates that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt.

## 2.3 Data protection

- The School holds personal information about pupils in order to safeguard and promote their welfare, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure compliance with all relevant legal obligations.

- The content of this form, when completed, will contain personal information which is subject to the provisions of the Data Protection Act 2018 and General Data Protection Regulation 2016. Pupils, and in certain circumstances their parents, have the right to request access to personal information about them held by the School, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to pupils or parents.
- The School will keep this record confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the Headmaster or the DSL, it is deemed necessary we may share this information with the social services or the police for the purpose of child protection investigations.
- All information related to any child protection matter is held securely by the DSL. All hard copies of documents are secured in a locked filing cabinet within the DSL's office. All electronic copies are password protected within the DSLs secure user area on the School's IT network.

### Appendix 3 - Child Protection Incident Reporting Form – Prep School

#### Record of Safeguarding Concern

Page no.

Name of child (print):

Parent Name:

Date of birth:

Year/class:

Notes of discussion: **(Receive, Reassure, Respond and Record)**  
Include as much detail as possible incl.. names, dates, times, peers involved.

Date of concern:	Date passed to DSL:
Signature of staff member:	DSL sign received:

Action taken **(update front sheet chronology as appropriate)**

Outcome:

Record completed by DSL (print) .....

Signed..... Date.....

## **Appendix 4 – Children missing in education**

Due consideration will be given to the statutory and non- statutory guidance in relation to the safeguarding and education of pupils. In all cases regarding a pupil's non- attendance at school or removal from roll, the Headmaster will advise the Local Authority in which the child lives at the earliest opportunity.

### **1. School age**

A child reaches compulsory school age on or after their fifth birthday. If they turn 5 between 1 January and 31 March, they are of compulsory school age on 31 March; if they turn 5 between 1 April and 31 August they are of compulsory school age on 31 August. If they turn 5 between 1 September and 31 December, then they are of compulsory school age on 31st December.

A child continues to be of compulsory school age until the last Friday of June in the school year that they reach sixteen. From September 2013 all 16 year-olds will be required to continue in education or training, until the end of the academic year in which they turn 17. From September 2015, they will be required to continue until their 18th birthday.

### **2. Entitlement to full-time education**

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. Wellington School recognises its responsibility in this. Wellington will monitor all pupil attendance and report any pupil who goes missing from education.

### **3. Sign of abuse or neglect**

A child who goes missing from Wellington School could be at risk of abuse or neglect. The School and staff will follow the School's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, travelling to conflict zones, FGM and forced marriage, and to help prevent the risks of their going missing in future.

### **4. Procedures for monitoring and reporting missing pupils**

- Wellington School has an admission register and an attendance register. All pupils are placed on both registers;
- Attendance registers are taken throughout the day, for both day pupils and boarders. Particular scrutiny is applied to first morning registration and first afternoon registration;
- In the Senior School, housemasters/mistresses or tutors take the morning registration electronically between 08:30 and 08:45
- Senior School class teachers take the afternoon registration electronically at the beginning of lesson 4 (13:40);
- In the Prep School, class teachers take registrations electronically. KS1 registers are taken at 08:40 and 13.00. KS2 registers are taken at 08.40 and 13.40;

- These registrations are closely monitored by the School Offices and any absences are followed up rigorously.
- In the Senior School any incomplete registrations are followed up and in the Prep School, the School Office is automatically informed; these are chased immediately;
- Patterns of absence are therefore closely scrutinised by a team of people: the Senior School DSL, housemasters/mistresses, tutors, Prep School class teachers and School Offices;

## **5. Reporting and referral of a pupil missing from education**

Children missing education will be reported to Somerset Safeguarding Children Partnership

- The School will inform the local authority (Somerset Safeguarding Children Partnership) 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. The School will take all reasonable steps to establish the whereabouts of the child. Reasonable steps include telephone calls to all known contacts, contact with other schools where siblings may be registered, and contact with any other service that is known to have contact with the pupil/family. All outcomes and contacts will be recorded on the pupils file;
- The school may refer absences of less than 10 days to the Somerset Safeguarding Children Partnership if the School suspects that such absences are indicators of abuse or neglect;
- All staff are trained to look for and recognise signs of abuse or neglect: frequent or unusual patterns of absence are possible signs and staff are made aware of this;
- Any member of staff who notices unusual patterns of absence must notify the DSL by following normal safeguarding procedures;

## **6. Other circumstances when the School must report pupil absence**

Wellington School will inform Somerset Safeguarding Children Partnership of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than 4 months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period;
- have been permanently excluded;

Somerset Safeguarding Children Partnership must be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds

for deletion are met, but no later than deleting the pupil's name from the register. It is essential that the School complies with this duty, so that Somerset Safeguarding Children Partnership can, as part of their duty to identify:

- Regulation 4 of the Education (Pupil Registration) (England) Regulations 2006; and
- Regulation 12(3) of the Education (Pupil Registration) (England) Regulations 2006.



## **Appendix 5 - Hire of School facilities by outside organisations - Safeguarding Procedures**

Where School facilities are hired by an outside organisation during holiday periods for the purposes of running any course/activity for children, the organisation will be asked to provide the following information:

- Proof of DBS checks of instructors/staff
- The organisations safeguarding policy
- A named safeguarding officer for the organisation

In circumstances where the hiring organisation is unable to provide some or all of this information, the School will carry out a risk assessment to determine if it is reasonable for that organisation to hire the School's facilities.

There are times when the School's facilities are hired privately by individuals (i.e. not part of an organisation) for the use of children during the School holidays, e.g. a birthday party. In all such circumstances, safeguarding procedures for such events during school holidays will be clearly displayed, as detailed below:

- Posters and leaflets are displayed indicating the name and contact details of the School's holiday course/activity safeguarding officer, who is the Princess Royal Sport Centre Manager.
- The contact details for Somerset Direct are also prominently displayed.
- Should a member of the public raise a concern about a child using the School's facilities during a holiday period, they should report this to the Princess Royal Sport Centre Manager.
- If a concern is raised, the Princess Royal Sports Centre Manager will contact one of the School's DSLs to agree a strategy in how to proceed.
- Child Protection Procedures will be followed in line with the School's Safeguarding and Child Protection Policy.

## **Appendix 6 Safeguarding procedures related to School Lockdown (Covid 19)**

### **Context**

**Due to COVID-19 measures, the School has operated under lockdown measures, and it is possible that this could happen again, with the School (or a section of the School) being forced to close due to a COVID-19 outbreak. This appendix to the School's safeguarding policy addresses safeguarding during an enforced school closure.**

Government guidance can be found here:

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

The scope of this appendix covers the School on site when caring for vulnerable children and children of key/critical workers, and for children who are remote learning.

The way schools and colleges are currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual. Most children are no longer in a school setting and staff numbers have been affected by the outbreak.

We will ensure that on any given day all staff and volunteers in attendance will be aware who the DSL and Deputy DSLs are and how staff and volunteers can speak to them.

### **Safeguarding priority**

During enforced school closure the safeguarding of all children at our school – whether they are currently at home or in attendance – continues to be our priority. The following fundamental safeguarding principles remain the same:

- the best interests of children continue to come first
- if anyone in our school has a safeguarding concern, they will act immediately
- a designated safeguarding lead (DSL) or Deputy DSL will always be available
- no unsuitable people will be allowed to gain access to children
- children should continue to be protected when they are online.

### **Reporting Arrangements**

Reporting arrangements continue in line with the Safeguarding and Child Protection Policy.

Communication of safeguarding concerns must be made in a timely fashion, i.e. no longer than 24 hours after the issue is disclosed, to the DSL or Deputy DSL.

Telephone the Safeguarding Lead or Deputy Safeguarding Leads to inform them of the issue. Record the issue in writing in MyConcern.

All staff have the telephone numbers of the DSL and Deputy DSLs and they can also be found at the beginning of this policy.

Any member of staff can report any safeguarding concern by calling Children's Social Care, Somerset Safeguarding Children Partnership.

### **Current school position**

*If the School (or a section of the School) is forced to close due to COVID-19, Wellington School (Senior and Prep) will remain open to vulnerable children and the children of key workers.*

*Teaching of pupils at Wellington School will be delivered remotely, using official school software on the School IT network.*

*All remote teaching and learning is accessed only through school IT accounts (pupils and teachers).*

*Where there are necessary exceptions to this, such as the use of telephone calls, clear guidance is given to staff, pupils and parents in how this is to be managed safely. This guidance is detailed within this annex.*

All staff and volunteers attending on site from outside our school will complete an induction to ensure they are aware of safeguarding risks and know how to act if they have concerns.

### **Safeguarding partners' advice**

We continue to work closely with our three safeguarding partners, and we will ensure this annex is consistent with their advice. This will include expectations for supporting children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need.

*The School is in contact with the local authority, specifically the Director of Children's Services (Julian Wooster). The School has informed the local authority what actions it will take to make provision for vulnerable children and the children of key workers and also to help us begin to consider how we can work together to support these groups of in the event of enforced school closure.*

*Local authority contacts in this regard:*

***Dave Farrow***

*Education Partnerships Business Support Team*  
*dfarrow@somerset.gov.uk*  
*07977 413276*

***Sarah Osborne*** - PA to Dave Farrow  
*Business Support Supervisor*  
*Education Partnerships Business Support Team*  
*EducationPartnerships@somerset.gov.uk*  
*01823 356258*

## **Roles and responsibilities**

The roles and responsibilities for safeguarding in our school remain in line with the School's Safeguarding and Child Protection Policy.

The Designated Safeguarding Lead is always available and can be contacted at any time, 24 hours a day. All staff have contact details, as well as the contact details of all Deputy DSLs.

In addition, the DSL and Deputy DSLs are on call on a rota basis when the School is open to vulnerable children and the children of key workers.

The DSL and Deputy DSLs telephone numbers are published to all staff.

If the School is caring for vulnerable children and the children of key workers who are not on role at Wellington School, we will ensure that we make contact with the DSL or Deputy DSL from the other school or college of those children.

A senior leader is the Duty Leader on site for each day of enforced closure. The senior leader takes responsibility for co-ordinating safeguarding on site.

## **Vulnerable children**

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHC plans.

Those who have a social worker include children who have a child protection plan and those who are looked after by the local authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

There is an expectation that vulnerable children who have a social worker will attend school, so long as they do not have underlying health conditions that put them at risk. Where a parent does not want their child to attend school, and their child is considered vulnerable, we will discuss this with the social worker and explore the reasons for this directly with the parent.

Those with an EHC plan will be risk-assessed in consultation with the local authority and parents to decide whether they need to continue to be offered a school place in order to meet

their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

We will encourage our vulnerable children and young people to attend school.

Senior leaders in our school, especially the DSL (and deputies) know who our most vulnerable children are, and they have the flexibility to offer a place to those on the edge of receiving children's social care support.

We will continue to work with children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children.

### **Increased vulnerability or risk**

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of pupils and their parents. Staff will be aware of this in setting expectations of pupils' work where they are at home. Where we are providing care for children of key workers and vulnerable children on site, we will ensure appropriate support is in place for them.

Our staff and volunteers will be aware of the mental health of [children](#) and their [parents and carers](#) and will contact the DSL or a Deputy if they have any concerns.

The School has a Mental Health Lead who has provided training for staff in supporting pupils with mental health issues. The Mental Health Lead is available to all pupils to support any Mental Health issue, including those related to COVID-19.

### **Attendance**

Where a child is expected but does not arrive at school, we will follow our attendance procedure and attempt to contact the family. If contact cannot be made, the DSL or a Deputy DSL will be informed. This is managed by the School's attendance lead who is the School's Safeguarding Administrator and PA to the DSL.

The School will attempt to contact the parents by telephone and email. If contact cannot be made, and if the DSL or a Deputy DSL deems it necessary, we will undertake a home visit or ask an appropriate agency to do so. A risk assessment will be carried out before any such visit is made to ensure staff the family are not put at risk.

Where a vulnerable child does not take up their place, we will notify their social worker.

### **Attendance of pupils at home remote learning**

Attendance of pupils for the purposes of remote learning when the School is closed is recorded by the School. However, the method for doing this is different for Prep School and Senior School pupils, due to age and access to online platforms.

Senior School: each day during term time, tutors remotely register their tutees. In line with DfE guidance, this registration data is held separately to 'normal' term time attendance data.

Prep School: each day during term time, teachers make contact with pupils, and this contact is recorded by way of 'remote registration'.

It is understood that families have varying IT provision at home and contact may not always be possible during the School's registration period at 08:30 each day. However, where contact cannot be established with a pupil, the tutor will contact parents to establish why.

This attendance data will be monitored by the DSL and Deputy DSLs. Where a tutor is concerned that a pupil is regularly missing remote registrations, or where contact is rarely made, or where contact cannot be made, the tutor must inform the DSL or Deputy DSLs who will investigate the matter as a safeguarding concern.

Children missing in education procedures will be followed in line with the School's Safeguarding and Child Protection Policy.

### **Reporting concerns about children or staff**

The importance of all staff and volunteers acting immediately on any safeguarding concerns remains. Staff and volunteers will continue to follow our Safeguarding and Child Protection procedures, as detailed in the School's Safeguarding and Child Protection Policy, and advise the DSL of any concerns they have about any child, including those who are not attending school.

The varied arrangements in place as a result of the COVID-19 measures do not reduce the risks that children may face from staff or volunteers. As such, it remains extremely important that any allegations of abuse made against staff or volunteers attending our school are dealt with thoroughly and efficiently and in accordance the Safeguarding and Child Protection Policy.

### **Staff training and induction**

For the duration of enforced school closure due to COVID-19 measures, the School's DSL and Deputy DSLs will receive safeguarding training and safeguarding briefings remotely via online platforms.

All current school staff have received safeguarding training as detailed in this policy.

### **Staff from another school**

If staff from another school/college/care setting attend the Wellington School site for the purpose of caring for vulnerable children and the children of key workers, in line with government guidance, Wellington School will not undertake any additional safeguarding checks if the setting providing those staff confirm that:

- the individual has been subject to an enhanced DBS and children's barred list check and, that in the opinion of that setting, nothing resulted from those checks that provided any caused for concern
- there are no safeguarding investigations into the conduct of that individual
- the individual remains suitable to work with children.

### **Safer recruitment/volunteers and movement of staff**

It is anticipated that there may be volunteers who wish to support the School in delivering remote teaching or in some other way, for example, retired teachers offering their services as remote teachers or on site for vulnerable children and the children of key workers.

For volunteers, we will continue to follow the checking and risk assessment process set out in paragraphs 167 to 172 of Keeping Children Safe in Education, September 2021. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to engage in regulated activity; this includes any form of remote teaching.

It remains essential that people who are unsuitable are not allowed to enter the School's workforce or gain access to children.

When recruiting new staff, we will continue to follow our Safer Recruitment procedures as detailed in the Safeguarding and Child Protection Policy.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

It is essential from a safeguarding perspective that we are aware, on any given day, which staff/volunteers are on our school site and that the appropriate checks have been carried out on those individuals. We will continue to maintain our single central record (SCR) during these measures to ensure we have this awareness. This process is managed by the Human Resources Director in conjunction with the DSLs at Wellington School and Wellington Prep School.

### **Peer on peer abuse**

We recognise that children can abuse their peers and our staff are clear about the school's policy and procedures regarding peer on peer abuse. All peer on peer abuse is unacceptable and will be taken seriously. We also recognise that abuse can still occur during a school closure or partial closure and between those children who do attend the school site during these measures.

Our staff will remain vigilant to the [signs of peer-on-peer abuse](#) and will follow the process set out in the Safeguarding and Child Protection Policy.

Additional guidance and training is given to staff in this regard.

Pupils and parents also receive guidance about peer on peer abuse in the context of remote learning, and know how to report concerns.

## **Online safety**

All staff must continue to follow the School's E-safety Policy.

It is likely that children will be using the internet and engaging with social media far more during this time. Our staff are aware of the signs of cyberbullying and other online risks and our filtering and monitoring software remains in use during this time to safeguard and support children.

Our staff will follow the process for online safety set out in our Safeguarding and Child Protection Policy and E-Safety Policy.

Staff who interact with children online will continue to look out for signs a child may be at risk. If a staff member is concerned about a child, that staff member will follow the approach set out in this annex and report that concern to the DSL or to a Deputy DSL.

Staff have received guidance and training in this regard.

Pupils and parents have received guidance about this and are aware of how to report concerns.

Teachers have received detailed guidance with regard to remote learning.

## **New children at the School**

Children may join our school from other settings. When they do, we will seek from those settings the relevant welfare and child protection information. This is relevant for all children that join us, but it will be especially important where children are vulnerable.

For vulnerable children we will ensure we understand the reasons for the vulnerability and any arrangements in place to support them. As a minimum we will seek access to that child's EHC plan, child in need plan, child protection plan or, for looked-after children, their personal education plan and know who the child's social worker (and, for looked-after children, who the responsible VSH) is.

Ideally this will happen before a child arrives but where that is not possible it will happen as soon as reasonably practicable.

Any exchanges of information will ideally happen at DSL (or Deputy) level, and likewise between special educational needs co-ordinators/named individual with oversight of SEN provision for children with EHC plans. However, it is acknowledged this may not always be possible. Where this is the case our school senior leaders will take responsibility.

The DSL will undertake a risk assessment based on the information received, considering how risks will be managed and which staff need to know the information.



## **Remote schooling - supporting children not in school**

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive additional pastoral support in school, they will ensure that a communication plan is in place to support that child. Details of that plan will be recorded in the safeguarding file for that child. It will be reviewed regularly to ensure it remains current during these measures.

The Safeguarding Team, DSL, Deputy DSLs and Safeguarding Administrator meet weekly to discuss safeguarding and significant pastoral concerns.

During the period of enforced school closure, the team will continue to do this by video or voice conferencing.

## **Pastoral care and mental health**

The School's pastoral structures will operate as normal during enforced school closure.

Full details of this can be found in the School's Pastoral Care and Remote Learning guidance document.

Mental health remains a significant issue for many pupils. Care for these pupils has been identified and is co-ordinated by the DSL, Deputy DSLs, Safeguarding Administrator and the Mental Health Lead. Ongoing remote support is provided for these pupils by pastoral teams and the School's Mental Health Lead.

Pastoral and/or mental health concerns must be communicated using normal school channels and systems.

Early help in this context remains of paramount importance. The School will identify pupils at risk of poor mental health and provide support in a timely fashion.

## **Specific guidance for staff for remote learning**

Staff have received detailed guidance concerning remote learning.

The School will continue to offer remote learning to boarding pupils who are unable to return to the school for part of the academic year due to COVID-19 travel restrictions in their own country, or travel restriction imposed by the UK.

Staff are trained to follow remote learning guidance in this instance also.

## **Staff Code of Conduct and professional standards**

The School's Staff Code of Conduct and pupil School Rules must be adhered to at all times. Safeguarding regulations and professional standards must be followed in just the same way as when teaching on site.

## **Software and online platforms**

Remote teaching must be carried out using school IT accounts and approved school platforms only. These platforms are accessible through individual school accounts and accessed through Office 365. Platforms that staff have received training in using include:

- Microsoft Teams
- Firefly
- Skype for Business
- Microsoft Outlook
- Microsoft Stream

These must be accessed through School IT accounts only. Under no circumstances should personal accounts be used for connecting with pupils.

No other software/online communication system can be used, unless approved by the IT Manager and the DSL for sound educational reasons.

## **Recommended websites and other online material**

Teachers must be vigilant to the fact that online filtering systems in the family home are unlikely to have the same level of filtering protection as the School network. Therefore, it is the teacher's responsibility to vet all recommended online learning material, websites, blogs, videos etc. to ensure it is suitable.

## **Self-declaration**

If at any time a teacher is compromised when remote teaching online, such inappropriate comments being made by a pupil during a Microsoft Teams conversation, or finding themselves lone working during a Teams or Skype video conference lesson, they must report this as soon as possible to the DSL or a Deputy DSL.

## **Updates to policy and guidelines**

Policy and guidelines are subject to change as remote learning develops and lessons are learned.

Updates will be disseminated to all staff involved in regulated activity.

It is the responsibility of staff to read this policy and separate guidelines and ensure they are following school policy and guidance.