

Safeguarding (Child Protection) Policy

This policy is applicable to all members of the St Hugh's community, including those in the EYFS.

Statement

The welfare of our pupils is the school's paramount concern. At St Hugh's, the governors, staff and volunteers do all that we can to promote the wellbeing and mental health of pupils and to ensure that children are protected from harm both within the School and beyond our direct control. The School recognises that we have a duty to protect children at risk of harm and also those children who need extra help, including children in the Early Years Foundation Setting (EYFS). We recognise our legal duty to work with other agencies in protecting children from harm and responding to allegations of abuse.

Aim

To ensure that the correct procedures are in place to enable Safeguarding issues to be dealt with effectively, efficiently and sensitively. To ensure that we practise safe recruitment by checking the suitability of staff and volunteers working with children. To establish a safe environment in which children can learn and develop.

Procedures

- Safeguarding is recognised as a critically important issue by the School.
- Guidance on the best way to react and deal with such issues is regularly updated and published as 'Safeguarding (Child Protection) Guidance'
- The School offers pupils a range of people to whom they may go to discuss problems, these include outside agencies. These people may be: any member of staff, form teachers, Senior Tutors, tutors, House Parents, the independent listener, the Children's Commissioner. Furthermore, the school also offers opportunities to be heard via the School Council, house meetings, boarding meetings, tutor meetings, etc. A list of names and contacts is made available to children.
- The School has a complaints procedure through which students, parents and staff can exercise their right to complain about issues which are worrying them in school.
- The School takes precautions to prevent the possibility of false allegations being made.
- Safeguarding related issues are taught as appropriate through the curriculum.
- The School seeks to promote positive, working relationships with other agencies involved in protecting children from harm and responding to abuse.
- The School also follows procedures set out by the Oxfordshire Safeguarding Children Board.
- Appropriate INSET will be provided for staff to ensure that they are up-to-date with Safeguarding issues and procedures.
- The DSL and Deputy DSL have job descriptions setting out their key responsibilities. The School will ensure the DSL and Deputy DSL have sufficient time, funding, supervision and support to fulfil their welfare roles. Regular reviews of their responsibilities will take place.

Latest Update: September 2021 – SLT including DSL

Latest Review and Ratification: September 2021 Chairman and Safeguarding Governor

Next Review and Ratification by Board of Governors: Autumn Term 2022

Safeguarding (Child Protection) Guidance

This policy is applicable to all pupils, including those in the EYFS.

The Designated Safeguarding Lead (DSL) with overall responsibility is **Richard Clarke** (Deputy Head Pastoral) and the Deputy DSL is **Jessica Blythe** (Head of Pre-Prep). Both the DSLs are members of the SLT (School Leadership Team). **James Thompson** (Headmaster) is a DSL, and the following staff are trained to the same level: Fiona Lines (Head Nurse), Julia Veness (Head of Middle School), Kevin Perry-Evans (House Parent). **Anna Coull** is the Board of Governors' designated Safeguarding governor.

The DSL or Deputy DSL will always be available to discuss Safeguarding concerns.

Important Background

- This policy pays due regard to:
 - *Children Act (1989)*
 - *'Keeping Children Safe in Education' (September 2021)*
 - *'Working Together to Safeguard Children' (2015)*
 - *Disqualification under the Childcare Act 2006 (By Association)*
 - *'Prevent' Counter-Terrorism and Security Act (2015)*
- A copy of this policy is made available to parents on the school's website and a copy is sent to those who request it. All staff who have experience in safeguarding are invited to contribute to the drafting of this policy.
- The school operates safe recruitment procedures (Recruitment Policy) in accordance with the Independent School Standards Regulations (ISSRs).
- The school seeks assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on other sites (eg. residential trips).
- The whole School Leadership Team (SLT), HR Administrator and Director of Music have undertaken Safer Recruitment training.
- The DSL and Deputy DSL receive appropriate training (from Oxfordshire Safeguarding Children Board) in Child Protection and Inter-Agency working every two years, as do the Headmaster, House Parents and Deputy Houseparent, Senior Nurse, Head of Middle School and Head of Pre-Prep and Early Years.
- All teaching, non-teaching staff and Headmaster receive Safeguarding training every two years delivered by the DSL and guided by Oxfordshire Safeguarding Children Board.
- This formal training is supplemented by annual updates provided to staff by the DSL during INSET and through email bulletins.
- Staff, children and parents receive training in online safety through the services of Child-Net.
- Induction training in Safeguarding is arranged for all new staff and volunteers and they are given the training and support to ensure they have the skills, knowledge and understanding to keep children safe. This includes training on the school's Safeguarding procedures and the identity of the DSLs as well as an explanation of:
 - the school's Safeguarding policy
 - the school's E-Safety policy
 - Part 1 and Annex A of KCSIE

- the obligations required by 'Prevent'
 - the school's Whistleblowing policy
 - the staff Code of Conduct
- The Board of Governors undertakes an annual review of the school's Safeguarding Policy and procedures and the efficiency with which they have been discharged at one of its Board meetings.
 - Following the annual review of Safeguarding by the Board of Governors, an annual Safeguarding Report is sent to the local authority each year.
 - The Board of Governors receives annual training updates on Safeguarding from the DSL.
 - The Governor with responsibility for Safeguarding meets with the DSL on a termly basis to discuss safeguarding matters.
 - Any weaknesses or deficiencies in Safeguarding matters will be rectified without delay.
 - The DSL will take the lead responsibility for safeguarding children within the EYFS setting and liaising with local statutory children's agencies as appropriate.
 - Procedures will be applied with common sense and judgement.
 - All staff are given and expected to read and understand Part 1 and Annex A of KCSIE each time it is updated and then sign to say they have done so. They will also be given the Safeguarding policy, Behaviour Management policy, Anti-Bullying policy and other documents contained in the Staff Handbook which also includes the Code of Conduct for staff.
 - Through the PSHE programme and in ICT lessons, children will learn about the issues surrounding safeguarding. They are taught how to adjust their behaviour to reduce risks, including safe use of electronic equipment and access to the internet. They are also guided towards building resilience to the risks of radicalisation.
 - The governors will ensure the school contributes to inter-agency working in line with *'Working Together to Safeguard Children'* through effective implementation of the child protection policy and procedures, and good co-operation with local agencies.
 - The school undertakes its duties under the Prevent scheme and all staff undergo online training.
 - The school has a Whistleblowing Policy and this can be found on the School Website, under 'Life at St Hugh's' in the Policies section or in the Staff Employment Handbook.
 - The school follows locally agreed inter-agency procedures.

Guidance for Staff

The most important thing to remember: REFER ON – do not keep information to yourself. You must inform the Designated Safeguarding Lead (DSL) (or the Deputy DSL or Headmaster in his absence), or the Local Authority Designated Officer (LADO) of any concern or allegation about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. It is a statutory requirement that all concerns should be recorded however minor.

Concerns about a pupil at risk or in need are made immediately to the DSL or Deputy DSL who will refer on to OSCB. Allegations against a member of staff or volunteer should be made to the Headmaster who will then refer on to the LADO. Safeguarding is everyone's responsibility and anyone can make a referral to children's social care. **Do not** assume that somebody else will take action and **do** share information that might be critical in keeping children safe.

If you have a concern about a child, please report a concern using the 'My Concern' software (accessed through the shortcut on your desktop) or if you do not have access to a school computer, please fill in the '**Cause for Concern' form** (see Appendix A), copies of which can be collected from

the DSL. **This information must be shared on 'My Concern' or the Cause for Concern form be given to the DSL or Deputy DSL as an absolute priority and certainly during the same day that the concern was noted.**

It is important to differentiate between safeguarding children who have suffered or are at risk of suffering serious harm and those in need of additional support from one or more agencies. The former should be reported to OSCB immediately; the latter should lead to inter-agency support using local processes.

In their school-based Safeguarding training, staff are reminded that they should ensure that their actions and behaviour do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. Such matters as one to one teaching, where staff are advised to ensure they can be seen by colleagues, are discussed at staff meetings and appropriate guidance given.

See also the Staff Handbook for further guidance for staff and also the Staff Code of Conduct.

Whenever possible staff should use a school camera to take photographs both on the school premises and offsite. Where personal devices need to be used to take photographs, images should be transferred to the school network within 12 hours, using their school email address if they need to be emailed. The images must be completely deleted from personal devices and any cloud storage as soon as possible and within 12 hours of them having been taken or within 12 hours of having returned from a residential trip. Mobile phones and personal cameras are not permitted in the EYFS setting.

Advice for Staff when dealing with disclosure

The following procedure is based upon the Oxfordshire Safeguarding Procedures and the National Minimum Boarding Standards.

- **Always stop and listen straight away to anyone who wants to tell you about incidents or suspicions of abuse.**
- **Explain that you need to make notes of what they are telling you and write a short account of what is being said.**
- **Do not give a guarantee of confidentiality.** Talk through the issue of confidentiality with the child. You can guarantee that you will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken; that you will never tell anyone who does not have a clear 'need to know'; and that you will personally take whatever steps you can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.
- **Avoid asking leading questions** like, 'What did s/he do to you?' Instead, please limit your questioning to those of a 'Wh' variety: What happened? When did it happen? Where were you?
- **Read your notes back to the person who has shared the information with you to check for accuracy.**
- **Go with the person to an appropriate environment when he/she has finished speaking with you, ideally the Nurses in the Medical Centre, explaining to them that the person has shared information of a Safeguarding nature with you. Do not leave him/her on his/her own.**
- **You should transfer the notes you have made to a written record immediately, using the 'My Concern' software on your desktop or if you do not have access to a computer, the**

'Safeguarding - Cause for Concern' form. Copies of this can be obtained from the Safeguarding noticeboards in each of Staff Rooms, Front Reception, the School Office or the DSL. If you have filled in the 'Safeguarding - Cause for Concern' form, please hand a copy to the DSL or Deputy DSL as soon as you have filled it in and certainly within the same day of the concern being reported to you.

- **Any member of staff who is told of any incident or has strong suspicion of physical or sexual child abuse occurring to a pupil, between pupils or which may constitute sexual harassment in School, at home or outside the School, must report the information immediately (and certainly within that same day) to the DSL, Deputy DSL or the Headmaster in their absence, or to the OSCB.**
- **School staff should not investigate reports of physical or sexual abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved will not be interviewed by School staff beyond the point at which it is clear that there is an allegation of abuse.**
- **If an allegation is made against a member of staff/volunteer then this should be reported directly to the Headmaster (or in his absence the Chairman of Governors) who will deal with the matter in conjunction with the DSL or Deputy DSL and following the school's disciplinary procedures as well as safeguarding procedures.**
- **If an allegation is made against the Headmaster then it should be immediately brought to the attention of the Chairman of Governors, without the Headmaster being told first. The Chairman of Governors will contact the LADO for further advice.**
- **All allegations must be referred to the LADO for advice before any investigations take place. In the case of serious harm, the police should be informed from the outset.**
- **If there has been a substantiated allegation against a member of staff, the school will work with the LADO to decide on any improvements to procedures or practices.**

Boarding

It is important to note that:

- Some Year 8 boarders have positions of responsibility in the Boarding House and are given appropriate briefing for dealing with any allegations of abuse they may hear.
- Should a child (including a boarder) go missing, then staff will refer to the Missing Child Policy for guidance.
- Boarders and their parents are informed about the possibility of reporting concerns or allegations to ISI (020 7600 0100). These contact details are also available on our website and in documents for boarders.
- Anyone will be given immunity from 'whistle-blowing' if they act in good faith over any allegation of abuse.
- The school is alert to issues that could arise between pupils and the potential for peer abuse. We would take appropriate disciplinary action if such an issue arose.
- If a member of the residential boarding staff is suspended pending an investigation of a child protection issue then alternative accommodation will be found for them away from the children in the boarding house.

Allegations Against Staff

Staff know that they are obliged to 'whistle-blow' if they have concerns about a colleague and must inform the Headmaster without delay. Where there are concerns about the Headmaster, this should be referred to the Chair of Governors. (This can be done by contacting Mr Paul Daffern, Chairman of Governors, without informing the Headmaster).

Paul Daffern's details are below:

Email : chair@st-hughs.co.uk

Staff should also consult the Whistle-blowing Policy.

The School follows Part 4 of KCSIE (2019) in dealing with allegations of abuse against teachers and other staff. In all cases in which it is alleged that a person who works with children has:

- (a) behaved in a way that has harmed a child, or may have harmed a child
- (b) possibly committed a criminal offence against or related to a child or
- (c) behaved toward a child or children in a way that indicates she or he is unsuitable to work with children

The School must follow LADO procedures where one or more of the criteria above is met. In operating the LADO procedures, the School must consider whether the allegation can be properly investigated if the person concerned remains in work.

The School will seek advice about suspension and alternatives to suspension and realises the final decision on these topics remains with the school. It would be very unusual for the School not to take the advice of the LADO, and if it were to do this the LADO may decide to take the issue to the Education Secretary.

If a member of staff, governor or volunteer is accused of abuse or improper conduct the Headmaster, James Thompson, must be informed as soon as possible. The school's procedures aim to strike a balance between the need to protect children and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow the guidance in Part 4 of KCSIE (2019). The Headmaster liaises with Oxfordshire Child Protection team for guidance. If the Headmaster is absent, the allegation should be passed to the Chairman of Governors.

The school ensures that all staff, teaching and non-teaching, governors and volunteers understand that there is a procedure to be followed on all occasions. If an allegation is made against a teacher the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays are eradicated. The local authority designated officer (LADO) will be informed within one working day of all allegations that come to the Headmaster's attention or that are made directly to the police. The School will not undertake its own investigations of allegations without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the Designated Contact may discuss the case with the LADO informally and without naming the school or individual.

All allegations are to be reported straight away, to the Headmaster (or, in his absence, the Chair of Governors – please see the first paragraph of this section for his contact details).

The Headmaster will discuss the allegations with the LADO, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Discussions will be recorded in writing, and communication with both the individual and the parents of the child/children agreed. The Headmaster will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The School will give due weight to the views of the LADO and the policy when making a decision about suspension.

The school is aware that there are restrictions on the reporting or publishing of allegations against teachers, and so would make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

Allegation against the DSL

If the accused member of staff is the Designated Safeguarding Lead, the Headmaster (or Chairman of Governors if the Headmaster is unavailable) will be informed immediately without the DSL's knowledge and the Headmaster will seek guidance from the LADO on the best procedure. In the case of serious harm, the police should be informed from the outset.

Child Abuse

The basis of all child abuse is the failure to recognise a child's basic needs and respond to them. Our duty as professionals is to be open to the possibility that various forms of abuse may take place, to identify the indicators of such abuse and to ensure that our concerns are transmitted to others. Any delay in doing this might leave the child open to further, and possibly more serious, abuse and might result in a possible loss of evidence which could have been used to improve the child's position. We recognise that because of the day-to-day contact with children, school staff are ideally placed to observe the outwards signs of abuse. It is the role of the DSL and Deputy DSL to keep a secure record, to monitor and to refer cases as necessary to Children's Services. These documents are to be kept separate from the child's academic file.

The school has signed up to the Thames Valley Police initiative 'Operation Encompass', whereby, within 24 hours of seeing a domestic abuse victim, Thames Valley Police will send an automated notification email (which is password-protected) to the school with details of:

- Date and time of incident
- Name and age of pupil/s present
- Home address and incident address
- NICHE occurrence number (police reference number)

It will not give details of other parties involved, the nature or seriousness of the incident, the victim's risk level, or the police investigation. The notification is simply to alert the school so that staff can provide welfare support to the pupil/s, if required.

According to KCSIE, 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 technically may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Children with special educational needs and/or disabilities may be particularly vulnerable.

An updated version of [Keeping Children Safe in Education](#) came into force in September 2021. Staff who don't work directly with children can read a condensed version of part 1 (annex A). All staff working directly with children are expected to read at least part 1 of KCSIE (those who don't work directly with children can now read the condensed version of part 1, in annex A). A summary of changes to KCSIE Part 1 are set out below:

New information on what staff should be alert to

- *It's been clarified that all staff should:*
 - *Reassure victims that they are being taken seriously and that they will be supported and kept safe. They shouldn't be given the impression they are creating a problem or made to feel ashamed for making a report*
 - *Know the indicators of abuse and neglect for specific safeguarding issues such as child criminal exploitation and child sexual exploitation*
 - *Be vigilant as multiple safeguarding issues will overlap with one another*
 - *Be aware of the risk factors that increase the likelihood of involvement in serious violence*
- *Updated list of factors which may indicate a child may benefit from early help - to include children with: health conditions, a mental health need, a family member in prison or affected by parental offending, at risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage, and persistent absence from education (including absences for part of the day)*
- *Updated list of extra-familial harms to include sexual abuse and county lines*

New expectations around peer-on-peer abuse

There are new expectations that all staff should:

- *Be aware that technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face)*
- *Be aware that children can abuse their peers online through:*
 - *Abusive, harassing, and misogynistic messages*
 - *Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups*
 - *Sharing of abusive images and pornography, to those who don't want to receive such content*
- *Recognise the indicators of peer-on-peer abuse, know how to identify it and respond to reports*
- *Recognise that peer-on-peer abuse may be taking place, even if not reported*
- *Understand their role in preventing it and responding to it if they believe a child may be at risk*
- *Understand the importance of challenging inappropriate behaviours between peers. If they don't, it can create an unsafe environment and lead to a culture that normalises abuse*
- *Abuse can take place inside and outside of school or online*

Updated guidance on the types of peer-on-peer abuse

- *Updated the definition of bullying to include prejudiced-based and discriminatory bullying*
- *Added abuse in intimate personal relationships between peers*
- *Updated the definition of physical abuse to include an online element which facilitates, threatens and/or encourages physical abuse*
- *Updated the definition of sexual violence to include an online element which facilitates, threatens and/or encourages sexual violence*
- *Added 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*
- *Updated the definition of 'sexting' to refer specifically to the consensual and non-consensual sharing of nude and semi-nude images and/or videos*

- Updated the definition of 'upskirting' to specify that it typically involves taking a picture under a person's clothing without their permission (previously this was 'without them knowing')
- Updated the definition of initiation/hazing type violence to include an explanation of what may be involved, including an online element

New information on child criminal exploitation (CCE) and child sexual exploitation (CSE)

The new paragraphs on CCE explain that:

- It can include vehicle crime and threatening/committing serious violence (previous examples located in annex B)
- Children may become trapped as they or their families may be threatened with violence and they may be coerced or entrapped into debt or into carrying weapons. They may carry weapons as a form of protection
- Children involved in criminal exploitation need to be treated as victims themselves (particularly older children), even though they may commit crimes themselves
- You should be aware that girls are at risk of criminal exploitation too, even though their experience may be different

The new paragraphs on CSE:

- Explain that it's a form of child sexual abuse
- Specify the types of activities that it covers, including physical contact and non-contact activities
- Add details on which pupils it can affect (previously located in annex B)
- Clarify that some children may not realise they've been exploited (e.g. they believe they're in a romantic relationship)

KCSIE defines child abuse in this way:

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 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. There is new guidance and expectations around tackling sexual violence and harassment (including peer-on-peer abuse)

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

Symptoms

The NSPCC lists some of the signs and behaviours which may indicate that a child is being abused: repeated minor injuries

- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- 'tummy pains' with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour
- depression, withdrawal
- relationships between child and adults which are secretive and exclude others
- pregnancy

These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

Child Sexual Exploitation (CSE)

This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply

affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Peer-on-Peer Abuse

Any child-on-child abuse will be referred on to the Oxfordshire Safeguarding Children Board as a child protection concern. This may include any of the forms of abuse named in KCSIE (such as bullying (including cyberbullying), sexual violence or sexual harassment, physical abuse, sexting (or youth produced sexual imagery), initiation violence and rituals or upskirting (typically involving 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)). The threshold employed is when the school believes there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". The Assistant Head (Pastoral) will deal with any such incidents and details will be recorded in isams. The victims will be well-supported and the perpetrators dealt with according to the school's Behaviour Management policy. A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. (See, also Anti-Bullying Policy).

All peer on peer abuse is unacceptable. The victims will be supported by the school's pastoral team and will be offered counselling should that be necessary. Through annual training provided by Childnet, all staff receive training to help them become aware of how behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting can put children in danger.

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. Staff know to raise any issues or concerns they have with the DSL, who will follow Home Office guidance if necessary.

Children with SEN and Disabilities

It is important to bear in mind that children with SEN and Disabilities can be more prone to peer group isolation; may receive a disproportionate impact from bullying; may have difficulties communicating how they are feeling than other children and such children are given special attention by the form teachers, Learning Support department and Senior Pastoral Tutors. Furthermore, staff must be aware that children with SEN and Disabilities may present with behaviour, mood or injury which relates to possible abuse and not just their SEN or disability.

Female Genital Mutilation (FGM):

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of

potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. It is mandatory for us to report to the police cases where we discover that an act of FGM appears to have been carried out.

Children missing from 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. A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. At St Hugh's we have procedures in place for handling unauthorised absence and 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, and to help prevent the risks of going missing in future. If a pupil is added or removed from our admissions register at a non-standard transition (ie. where a compulsory school-aged child leaves before completing the school's final year or joins after the beginning of the school's first year) then the local authority is informed.

The 'Prevent' duty

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways.

Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing 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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Our responsibilities under the Prevent Duty involve four general themes, namely risk assessment, working in partnership, staff training and IT policies, and include the following:

- Assessing the risk of pupils being drawn into terrorism, including extremist ideologies
- Continuing to work in partnership with local authorities
- Ensuring that all staff complete the Channel online training module to give them an awareness of the issues involved with this subject
- Ensuring the DSL and Deputy DSL undertake Prevent awareness training
- Ensuring that suitable filtering and monitoring is in place on school internet, and that school ICT training for pupils and staff includes the risks of radicalisation and the dangers of extremism. This is reflected in the ICT Acceptable Use policies.
- Ensuring that any visiting speakers are checked to ensure they are suitable and then appropriately supervised when in school.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Assessments should consider such factors, so it is important that the school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

The role of the DSL & Deputy DSL

The DSL and Deputy DSL take lead responsibility for safeguarding, child protection and on-line safety

Managing referrals

The DSL and Deputy DSL are expected to:

- refer cases of suspected abuse to the local authority children's social care as required.
- support staff who make referrals to local authority children's social care.
- refer cases to the Channel programme where there is a radicalisation concern as required.
- support staff who make referrals to the Channel programme.
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Working with others

The DSL and Deputy DSL are expected to:

- liaise with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- act as a source of support, advice and expertise for staff.
- The DSL will liaise with the Head of IT and E-Learning group as head of on-line safety and ensure that pupils & staff are aware of how to keep themselves safe on-line.

Training

All staff trained to DSL level undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The DSLs undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills are refreshed (via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

- ensure each member of staff has access to and understands the school's Safeguarding policy and procedures, especially new and part time staff.
- are alert to the specific needs of children in need, those with special educational needs and young carers.
- are able to keep detailed, accurate, secure written records of concerns and referrals.
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raising Awareness

The DSL and Deputy DSL should:

- ensure the school's Safeguarding policy is known, understood and used appropriately.
- ensure the school's Safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- ensure the Safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding; and
- provide Safeguarding training for staff annually
- ensure that on-line safety is taught throughout the school and pupils, staff and parents are kept abreast of on-line safety developments

Child Protection records

Where children leave the school their child protection file is transferred to the new educational setting. This is transferred separately and securely from the main pupil file by the DSL, and a confirmation of receipt is obtained. Correspondingly, the school requests child protection records from feeder schools.

Availability

The DSL and Deputy DSL are always available for staff to discuss any safeguarding concerns, as are those staff trained to DSL level. Their email and contact numbers are available to all staff.

The process which the DSL or Deputy DSL will follow upon receiving an allegation of physical/sexual abuse:

the DSL or Deputy DSL will:

- Limit questioning to the minimum necessary to seek clarification, avoiding 'leading' the pupil or adult by making suggestions or asking questions that introduce their ideas about what may have happened.
- Stop asking any more questions as soon as the pupil or adult has disclosed that he believes that something abusive has happened to him or to someone else.
- Tell the informing pupil/adults that he will now make sure the appropriate people are brought in. In the first instance this will be the Headmaster, as well as informing the School Governor overseeing Safeguarding, Mrs Anna Coull. Parents will be informed as long as this

does not put the child at further risk of harm and the school does require parental consent for referrals to statutory agencies.

- Ask the informing pupil/adult what steps they would like taken to protect them now that they have made an allegation and assure them that the School will try to follow their wishes. Take any steps needed to protect any pupil involved from risk of immediate harm as well as considering any child who may have specific needs (educational or physical).
- Refer the matter immediately (within 24 hours) to the Oxfordshire Safeguarding Children Board (see below for contact details) either in writing (using the required Referral Form) or with written confirmation of a telephoned referral.
- In the event that an allegation is made against a member of staff, the school will not impose a threshold test for referral to the LADO but pass on any concerns or allegations immediately. The LADO will decide what is beyond the threshold test.
- If the allegation is made against the DSL or Deputy DSL, the Headmaster will refer this directly to the LADO and not discuss this with the DSL or Deputy DSL.
- Follow any requests given by the Oxfordshire Safeguarding Children Board with regard to:
 1. informing a pupil's parents
 2. medical examination or treatment for the pupil
 3. immediate protection needed for a pupil who has been the victim of abuse, a pupil who has given information about abuse and a pupil against whom an allegation has been made.
 4. informing people at School (including any other members of staff) of the allegation
 5. attending Case Conferences
- Inform the pupil/adult who made the initial allegation of what the next steps are to be, having agreed these with the Oxfordshire Safeguarding Children Board.
- If there is no reasonable alternative, suspend from duty, pending investigation, any staff member alleged to have abused a pupil or pupils. If the member of staff is the Head, the Chairman of Governors will undertake this action. Suspension of staff should not be a default response to an allegation.
- Take any necessary steps for the longer-term protection and support of each pupil who has made allegations of abuse, or is alleged to have suffered from abuse, taking his/her wishes fully into account.
- Ensure that any pupil being interviewed by the police has a supportive member of staff of his/her own choice to accompany him.
- Notify DfE of any allegation that is being investigated by the Oxfordshire Safeguarding Children Board and/or police.
- Ensure co-operation by the School in any subsequent investigation by Oxfordshire Safeguarding Children Board or police.

- Make arrangements where feasible for any pupil who has been the subject of abuse to receive any necessary continuing counselling and support by agreement with his/her parents where appropriate. This will also be available to staff should they require support relating to the stress and upset of dealing with a disclosure.
- Inform, (as an instance of 'serious harm to a pupil'):
 1. The Local District Health Authority
 2. The Police
 3. The Department of Health, at CS2C, Room 2~6, Wellington House, 133-155 Waterloo Road, London, SE1 SUG

The School will consider taking disciplinary action against any member of staff, or agent of the School, where it believes pupils are at risk of abuse from that member of staff, even in cases where there is to be no criminal prosecution.

The School may apply appropriate sanctions to pupils who are found to have made malicious allegations. This could include temporary or permanent exclusions or referral to the police if a criminal offence may have been committed.

Allegations found to be malicious should be removed from personnel records. Records of all others must be kept but any that are not substantiated, are unfounded or malicious should not be referred to in employer references.

A referral will be made to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. [The reasons for such an order are 'unacceptable professional conduct, 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

The School understands its obligation to report to the Disclosure and Barring Service (DBS) within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children; its address for referrals is PO Box 181, Darlington DL1 9FA (tel 01325 953 795).

Where the School has 'low level' concerns that do not amount to allegations or suspicions of specific abuse but which may indicate the possibility of abuse occurring, the designated member of staff will discuss these with the Oxfordshire Safeguarding Children Board where necessary and record them appropriately.

Whistleblowing

It is vital that as a school we have a culture of safety and of raising concerns. There are clear procedures for reporting and handling concerns and further details can be found in the Staff Employment Handbook and in the school's Whistleblowing Policy. The Contacts section below has the telephone number of NSPCC which may be a helpful source of advice for staff wishing to whistle blow.

Procedure

Any Concerns? Follow the Safeguarding policy and immediately tell the DSL (Designated Safeguarding Lead) i.e. Nick Armitage (Deputy Head) or Deputy DSL, Richard Clarke (Assistant Head Pastoral). You are also allowed to report a concern directly to OSCB yourself.

SAFEGUARDING CONTACT DETAILS

Designated Safeguarding Lead (DSL): Richard Clarke Deputy DSL: Jess Blythe Headmaster: James Thompson		clarker@st-hughs.co.uk blythej@st-hughs.co.uk headmaster@st-hughs.co.uk 01367 870700
Chairman of Governors: Paul Daffern		Email: chair@st-hughs.co.uk
Governor with responsibility for Safeguarding: Anna Coull		Email: safeguardinggovernor@st-hughs.co.uk 01367 860689/07470116357
Queries or “No Names Consultation” contact: Locality Community Support Workers		Anita Gillett anita.gillett@oxfordshire.gov.uk 07780 490757 Ginny Stock ginny.stock@oxfordshire.gov.uk 07775 025262 0345 2412608 or lcss.south@oxfordshire.gov.uk
New referrals and named enquiries go to Oxfordshire’s Multi-Agency Safeguarding Hub (MASH)		0345 050 7666 mash-childrens@oxfordshire.gcsx.gov.uk
Donna Crozier	Local Authority Designated Officer (LADO)	01865 816382/07901 331799 donna.crozier@oxfordshire.gov.uk
CAMHS	Family Assessment and safeguarding service (FASS)	01865 902418
Police	Thames Valley Force Crime Investigation Department: Protecting Vulnerable People Team Police Enquiry Centre	999 (emergency) 101(non-emergency Police telephone number)
Ofsted Complaints		0300 123 4666
NSPCC Child Protection Helpline		0808 800 5000 Help@nspcc.org.uk
Childline (for children and young people)		0800 1111
CEOP (Child Exploitation and Online Protection)		www.thinkuknow.co.uk
DBS (Disclosure and Barring Service), PO Box 3961, Royal Wotton Bassett SN4 4HF		customerservices@db.gov.uk 03000 200190
Oxfordshire Safeguarding Children Board – Access website for local procedures concerning all aspects of safeguarding, including ‘Prevent’.		www.oscb.org.uk oscb@oxfordshire.gov.uk 01865 815843

PREVENT CONTACT DETAILS

Contact OSCB (see above) and ask for the LADO.

Anti-Terrorist Hotline	0800 789321
Crime Stoppers	0800 555111
The Department of Education dedicated telephone and mailbox for non-emergency advice for staff and governors	0207 3407264 Counter.extremism@education.gov.uk
The Prevent Strategy	www.gov.uk/government/publications/prevent-duty-guidance
The Prevent Duty	www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

For information and support for young people on keeping safe amid increased online activity, visit the following websites:

Anti-Bullying Alliance	www.anti-bullyingalliance.org.uk
CEOP Thinkuknow	www.thinkuknow.co.uk
Childline	www.childline.org.uk
Kidscape	www.kidscape.org.uk
UK Safer Internet Centre	www.saferinternet.org.uk

SAFEGUARDING CHILDREN – CAUSE FOR CONCERN

If you have concerns about a child, please either report a new concern on the 'My Concern' software or complete this form* and discuss the concerns with the Designated Safeguarding Lead (DSL) as soon as possible (within one working day).

DSLs: *Richard Clarke (Deputy Head Pastoral) – Lead DSL; Jessica Blythe (Head of Pre-Prep) – Deputy DSL; James Thompson (Headmaster – please contact him separately if your concern is about the behaviour of an adult)*

If you are concerned about an injury e.g. a bruise, use the body map to identify the position and be specific about the size, and colour of the bruise on the body.

If a child has made a disclosure, do not promise to keep it a secret. Tell the Designated Safeguarding Lead (DSL) immediately and write down everything the child has told you.

N.B. At all stages confidentiality is crucial.

Child's Name:	Form:
Date concern noted:	
Nature of concern: (Please give <u>full details</u> of the nature of the concern, ensuring that you record <u>dates</u> , <u>times</u> , <u>frequencies</u> , as appropriate and any relevant conversations with the child.)	
Staff member's name:	
Signature:	
Date passed on to DSL:	

Initial action taken: (this section might include details of initial enquiries of the child, consultation with the DSL, contact with OSCB, any contact with or explanations from mother/ father/carers etc.)

Date: **Time:** **DSL Signature:**

*This report will be transferred onto My Concern and stored there.

Body Map

If you note down any marks/bruises/injuries on this page, please take this immediately to the Nurse on duty in the Medical Centre and do not investigate any further yourself.

