

# SAFEGUARDING POLICY AND CHILD PROTECTION PROCEDURES

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

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This policy will be reviewed annually or according to statutory change or following a review of a safeguarding case.	

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### **Chair of Governors**

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Somerset Safeguarding Children Partnership 0300 123 2224

Somerset Emergency Duty Team (evenings, weekends and bank holidays) 0300 123 2327

Family Front Door Consultation Line (advice on referrals and EHA's) 0300 123 3078

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  
01823 355014

Police Safeguarding Coordination Unit  
[safeguardingcoordinationunitsouthern@avonandsomerset.pnn.police.uk](mailto:safeguardingcoordinationunitsouthern@avonandsomerset.pnn.police.uk) 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) 0300 1233155  
[Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

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

01325 953 795

PREVENT DUTY  
[PreventSW@avonandsomerset.police.uk](mailto:PreventSW@avonandsomerset.police.uk)

01278 647466

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 is defined as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing 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;
- taking action to enable all children to have the best outcomes.

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 2024*:

<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 throughout the school and the boarding facilities. 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 B of KCSIE 2024. 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.

It is important to note that harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

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.

Part 1 and Annex B of KCSIE 2024 should also be referred to by all senior members of staff and those staff working directly with children. We ensure all that staff read the appropriate sections of KCSIE 2024 as part of their induction and ongoing training. For details see the training grid in Appendix 6

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

### 1.4 Child-on-child abuse

**All** staff should be aware that children can abuse other children including online (often referred to as child on child abuse). Child-on-child abuse can happen in any environment and is not restricted to school settings and can happen concurrently both online and face to face. 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, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; 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).

## **Responding to Incidents of Child-on-child abuse**

Any incidents of abuse and harm are treated in line with the Safeguarding Policy and in conjunction with the Behaviour Policy.

Concerns regarding the welfare of pupils and any subsequent support process will be recorded and kept securely on their safeguarding file.

At Wellington School:

- We have a zero-tolerance approach to all types of abuse. Incidents are taken seriously. These will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.
- Banter and teasing should be acknowledged and recognised as bullying behaviour and may require proportionate intervention.
- We aim to mitigate the risk of contributing to a culture of unacceptable behaviours or a culture that normalises abuse through education and reflective learning.
- Child-on-child abuse may reflect equality issues in terms of those who may be targeted are more likely to have protected characteristics.
- Early identification of vulnerability to child-on-child abuse is made by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.
- All Boarding Staff are trained to recognise that children can be particularly vulnerable in residential settings particularly where accommodation is shared overnight and are alert to the potential for child on child abuse

There are clear systems in place for pupils to report any abuse knowing their concerns will be treated seriously and respectfully.

Wellington School will handle initial reports of abuse by:

- Securing the immediate safety of pupils involved in an incident and sourcing support for other young people affected. In Boarding this may involve reviewing accommodation

arrangements of the pupils involved, reflecting the risks associated with children sharing overnight accommodation.

- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.
- Ensuring that victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. They will never be made to feel ashamed for making a report.
- Ensuring the child's wishes are taken into consideration in any intervention and any action is taken to ensure safety of the victim and other members of the wider peer cohort.
- Not promising confidentiality as it is highly likely that information will need to be shared with others.

A diagram outlining our process for responding to all types of abuse can be found at Appendix 2.

## **Responding to Incidents of Sexual Violence and Harassment**

Reference to Keeping Children Safe in Education 2024 should be made in relation to taking protective action.

Wellington School will take the following actions when responding to incidents of sexual violence and sexual harassment:

- Incidents will be reported immediately to the DSL/Deputy DSL who will undertake further assessment of what action should be taken proportionate to the factors that have been identified.
- The Brook Tool should be utilised to inform assessment of risk and what actions to subsequently take. This may include seeking specialist advice and guidance from the education psychology team.
- Proportionate action will be taken and consideration given to whether a case can be managed internally or whether support from other support agencies is required.
- When an incident involves an act of sexual violence (rape, assault by penetration, or sexual assault):
  - Cases will be reported to the police regardless of the age of criminal responsibility (10 years old)
  - A concurrent referral to Local Authority Children's Social Care must also be made
  - Local Authority Children's Social Care will determine whether an assessment is required under sections 17 or 47 of the Children Act 1989
  - Where the report includes an online element, the setting will follow the following government guidance Searching, Screening and Confiscation at School and Sharing Nudes and Semi-Nudes
- Risk assessments and or safety plans will be developed for individual children who have been involved in an incident. This should be reviewed regularly or every time there is an occurrence of an incident. These should involve the child and parents/carers and address contextual risks.

### **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
- Has experienced multiple exclusions for poor behaviour
- Has persistent/prolonged unexplained absences from school

## **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. 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 child on child abuse, particularly if there is a significant gender imbalance.

Boarding staff receive additional induction and safeguarding training tailored to meet their specific, additional duties. This includes supporting all boarders to understand the school's policy on sexual relationships.

All Boarding Heads of House 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/DDSLs termly attendance at the Somerset Independent Schools' Safeguarding meeting

DSL/DDSL termly attendance at the Somerset DSL Safeguarding Briefings

## 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 2024, 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 2024, 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).

### **1.15 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. For further detailed information please refer to the Mental Health Policy.

## **2. Child protection procedures**

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

If a member of staff has safeguarding concerns about a child they should act immediately and speak to the Designated Safeguarding Lead or, if they are unavailable, to a member of the safeguarding team.

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.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This

should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

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 Local Authority 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 Local Authority 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. Please refer to the flow chart in Appendix 2.

Where staff have concerns that a child is in immediate danger or is at risk of harm a referral should be made to Local Authority 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 Local Authority 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 Family Front Door 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 Local Authority Children's Social Care, in line with referral thresholds contained within Effective Support for Children and Families (July 2017).

Borderline cases will be discussed with Family Front Door Consultation line without identifying individuals and following discussions The DSL will judge whether or not an allegation or concern meet the relevant threshold. Local Authority 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 Local Authority 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 child-on-child abuse which the School has reported to Local Authority 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 Local Authority 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 Head or DSL without delay. The Head 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 Local Authority Children's Social Care or the police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with Local Authority Children's Social Care or the police what information can be disclosed.

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

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).

## **2.2 Procedures for managing allegations of abuse against staff, volunteers and the Head**

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the Head;
- where there are concerns/allegations about the Head, this should be referred to the Chair of Governors (Anna Govey [a.govey@wellington-school.org.uk](mailto:a.govey@wellington-school.org.uk))

All concerns relating to adults will be managed by the Head. The Head may delegate authority to the DSL to liaise with the LADO (Local Authority Designated Officer) when dealing with concerns about children.

The School's procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Local Safeguarding Children Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out in the Staff Code of Conduct.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will establish the basic facts in order to determine whether there appears to be any foundation to the allegation. The School will not undertake their own investigation of the allegation(s) 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 School may discuss with the LADO in the first instance to receive further guidance.

When dealing an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors . Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and may make any referral via them.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.)

The Head, as Case Manager, may delegate authority to the DSL to liaise with the LADO.

All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or Local Authority Children's Social Care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to Local Authority Children's Social Care .
4. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff

- redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the School so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.
7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
8. The case manager will ensure that parents of the child/children involved are informed as soon as possible and kept informed about progress of the case, subject to any advice from Local Authority Children's Social Care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it),

unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.<sup>110</sup>

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Local Authority Children's Social Care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

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

## **DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS**

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting

which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

### **DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)**

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's Staff Code of Conduct which includes the Low Level Concerns Policy can be found on the school website. The aim of the Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns Policy. The Head is the ultimate decision-maker in respect of all low-level concerns.

## **Learning Lessons**

In any cases, where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

### **2.3 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)).

### **2.4 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 Local Authority 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 2024, 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 Head or DSL straight away.

## **2.5 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 Head 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 Local Authority Children's Social Care or the LADO as appropriate.

## **2.6 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.

## **2.7 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.

## **2.8 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.

## **3. Roles and responsibilities**

### **3.1 Governors**

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.

### **3.2 Head**

The Head will

- meet regularly with the Designated Safeguarding Lead
- offer support to the Designated Safeguarding Lead in ensuring that safeguarding policies and procedures are up to date
- support the DSL as required in ensuring that training is delivered to staff which supports both their understanding of the School's safeguarding policy, and their ability to follow safeguarding procedures

### **3.3. 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 2024. 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 inter-agency training at least every two years and informal updates on a more regular basis 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 2024. 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;
- takes a lead on ensuring on-line safety is a key priority across the school
- 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. The DSL has regular supervision with a nominated professional who provides a space to reflect on recent procedures and cases.

### **3.4 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 Local Authority 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 DSL may be required to contact the LADO, if delegated the authority to do so by the Head, when there are concerns that someone who works with children has behaved in a way that has or might harm a child. If it is suspected that a criminal offence has been committed then the police will also be contacted.

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 perpetrators 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>

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 Head 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.

#### **4. 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 Head 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; including acceptable use of IT, staff/pupil relationships and use of social media.
  - Whistleblowing Policy;
  - KCSIE 2024, Part 1 and Annexe B or if appropriate Annexe A (see training grid)
- signed confirmation from the individual that policies have been read and an online questionnaire;
- the role and identity of the DSLs and DDSs;
- training is 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 are absent 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' abuse,
- forced marriage
- female genital mutilation.

Training on the early help process and process for making a referral to Local Authority 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 any of the above practices are 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 Head 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 Head 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 Head is trained to the same level as the DSL.

## **5. 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.

## **5.1 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 Local Authority 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 Head, 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.

## **5.2 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.

## **5.3 Children absent 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 absent 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, the Attendance Policy and with due regard for KCSIE 2024 guidelines.

In accordance with the Attendance Policy the School SACs will monitor daily 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.

## **5.4 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.

## **5.5 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.

## **5.6 Child sexual exploitation**

The School recognises that children who are victims of child sexual exploitation may be absent 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.

## **5.7 So-called 'Honour based' abuse**

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 Head 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 Local Authority 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.

## **5.8 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.

## **5.9 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.

## **5.10 Use of all electronic devices with imaging and sharing capabilities**

Neither staff nor children may use their own mobile phones or any electronic devices with imaging and sharing capabilities to take photographs within the School's EYFS setting; nursery and up to Reception year. All mobile phones and electronic devices with imaging and sharing capabilities 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.

## **5.11 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, harmful messages of a misogynist and misandrist nature; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example

The DSL takes a lead on ensuring that interventions are effective, that online safety is concerned in relevant policies and procedures and that it is interwoven in safeguarding training for staff and safeguarding is on the curriculum for pupils.

The School addresses these issues in the following ways:

- appropriate filters and monitoring systems are in place to keep children safe online.  
Filtering - Wellington School utilises the Sophos suite of security products to provide a safe and secure network for both staff and students. The Sophos firewall allows for

categories of website, or websites containing particular key words, to be restricted as appropriate. Students are subjected to the most restrictive filtering to prevent inappropriate content from being viewed. All school owned devices and connections to the Wi-Fi network identify the logged-on user back to the Sophos firewall to ensure that the appropriate filtering is applied to any web browsing. Anyone utilising the guest Wi-Fi network is subjected to the same filtering as students to ensure that restrictions cannot be bypassed. If an attempt to use an anonymisation tool such as a VPN or proxy is detected, the firewall will actively block the connection to and from the device to prevent restrictions and filtering from being bypassed.

Monitoring - An additional product named FastVue complements the Sophos firewall by compiling a student's browsing information from the firewall logs into an easy to understand report. Individual students or groups of students can be selected for immediate notifications to safeguarding staff should there be attempts made to view restricted content. The DSL/DDSL will check these reports as soon as they arrive and apply appropriate safeguarding protocols to ensure the immediate safety of any student deemed at risk; All school PCs have Senso.cloud installed on them, providing classroom management and keyword detection in all applications, not just web browsing. Immediate alerts including a screenshot are sent to safeguarding staff allowing them to review the context of the violation and take immediate action if a detection is of concern.

- 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 School regularly leads initiatives in raising awareness of online safety.
- prepare children with information for any online challenges and hoaxes; sharing information with parents and ensuring they know where to get help
- 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 ,4G and 5G technology:**

The School understands that many children have unlimited and unrestricted access to the internet through 3G, 4G and 5G 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/4G/5G.

The School does not allow the use of VPN's and any pupil found using them may have their internet privileges revoked.

- 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/5G device.
- We recommend that pupils are not given 3G/4G/5G 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.

## **5.12 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 shared 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 authorities.

### **Transfer of Safeguarding Records**

Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

### **Confidentiality**

- The Head 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.

## 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:
  - Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing <sup>[1]</sup><sub>[SEP]</sub>
  - 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 <sup>[1]</sup><sub>[SEP]</sub>
  - The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department <sup>[1]</sup><sub>[SEP]</sub>
  - Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR. <sup>[1]</sup><sub>[SEP]</sub>

### 5.13 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 <sup>[1]</sup><sub>[SEP]</sub>
- UK Council for Internet Safety (UKCIS)27 guidance: Education for a connected- <sup>[1]</sup><sub>[SEP]</sub> world <sup>[1]</sup><sub>[SEP]</sub>
- National Crime Agency's CEOP education programme: Thinkuknow <sup>[1]</sup><sub>[SEP]</sub>
- Public Health England: Rise Above <sup>[1]</sup><sub>[SEP]</sub>

## 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 2024)

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.

### **Child on child abuse**

**All** staff should be aware that children can abuse other children (often referred to as child on child 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 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 Local Authority 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 2024 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 44 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 abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

## **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year- olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

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

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **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. Perpetrators 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 Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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 gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. Experiencing 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 child on child 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. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.<sup>250</sup>

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced 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 Local Authority 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 Local Authority 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

[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://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 Local Authority 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)

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

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.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.

### **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

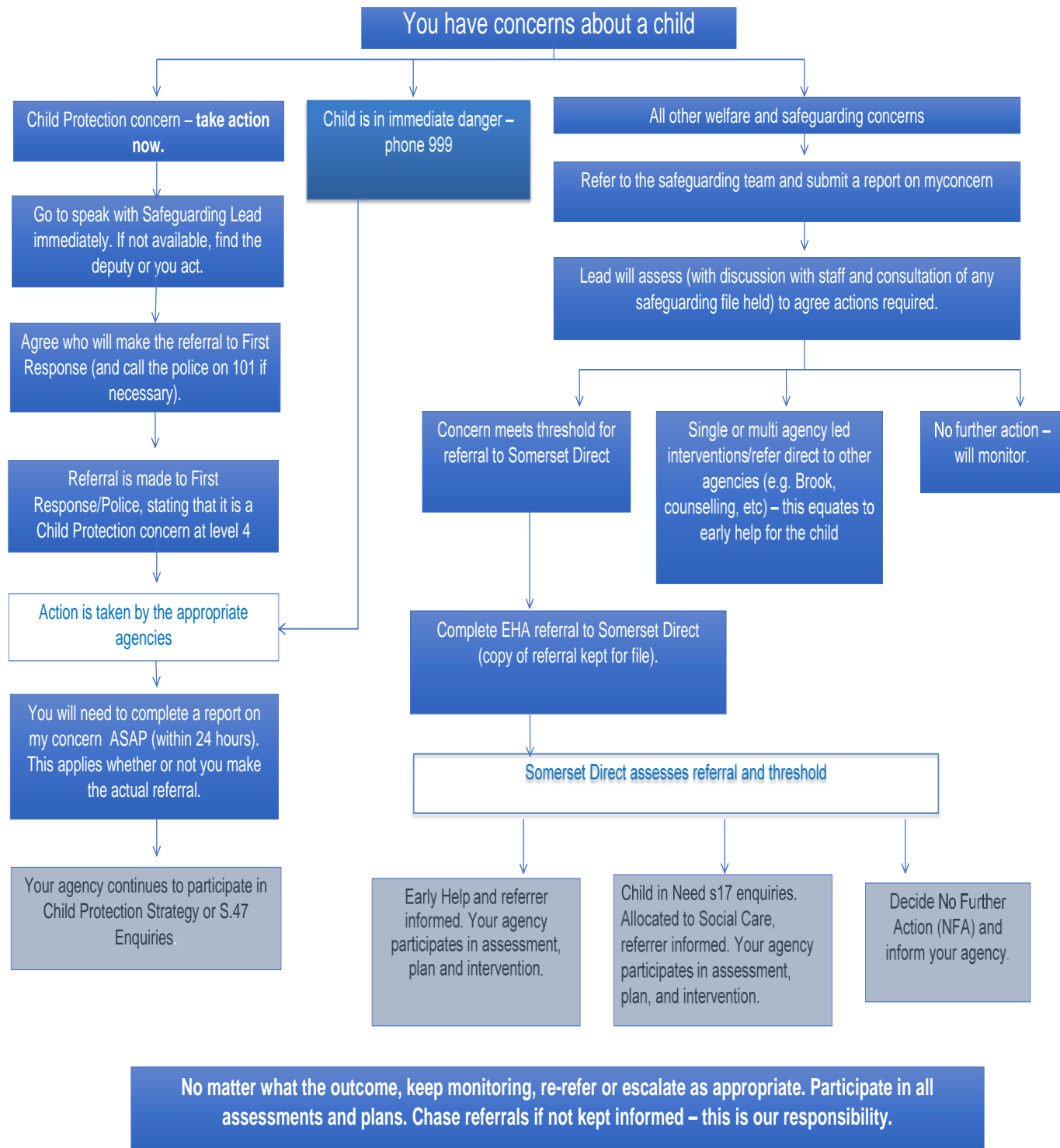
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Non-consensual sharing of sexual images and videos;
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media;
  - 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.

## Appendix 2 Reporting Process Flow Chart



## **Appendix 3 - Children absent from 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, regular absence from school or removal from roll, the Head 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 is either absent from education or who has a pattern of regular absences.

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

A child who goes missing from Wellington School or who has regular absences could be at risk of abuse or neglect. The School and staff will follow the School's procedures for dealing with children that are absent 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, 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 absent from education**

Children absent from 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 4- 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:

- The organisations safeguarding policy which will be reviewed by the School's Designated Safeguarding Lead
- A named safeguarding officer for the organisation who will be on site for the duration of the hire period
- Evidence that they have undertaken all relevant pre-employment checks (e.g. DBS check, verification of identity) for all employees and volunteers
- their own risk assessment based on the organisation's activities and details of the first aid supplies that they will provide that relate to the risk assessment

The contact details of the school's DSL or DDSL will be shared with any hirer who is planning to use the facilities for an activity/activity involving children. In the event that an allegation is made relating to an incident that occurs whilst using the school premises, the hirer must notify the school's DSL (or DDSL) within 24 hours. In this situation both the hirer and the school will be required to follow their safeguarding policies and procedures and where appropriate be required to notify the LADO and any other relevant agency.

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 the details of the DSL and other key contact information are provided to all hirers on arrival onsite

Should a member of the public raise a concern about a child using the School's facilities during a holiday period, this should be reported to the DSL who will follow the Child Protection Procedures will be followed in line with the School's Safeguarding and Child Protection Policy.

## **Appendix 5 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. If, for any reason the DSL and all trained DDSL's are unavailable due to illness the most senior member of staff will liaise with Somerset Safeguarding Children Partnership.

### **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 Local Authority 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 Local Authority 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. 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 in the event of enforced school closure.*

*Local authority contacts in this regard:*

**Tel:** 0300 123 7365 **Email:** [SSE@somerset.gov.uk](mailto:SSE@somerset.gov.uk)

## **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 Local Authority 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.

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 absent from 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 311 to 318 of Keeping Children Safe in Education, September 2024. 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.

### **Child on child abuse**

We recognise that children can abuse their peers and our staff are clear about the school's policy and procedures regarding child on child abuse. All child on child 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 child-on-child 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 child on child 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 as 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.

## Appendix 6 Staff Training Grid

Group	Roles	Induction	Mandatory Training
<b>Group 1 - Managed by HR Delivered by EW and JMK (Staff who are NOT face to face or unsupervised)</b> Staff and volunteers who have infrequent contact with young people or families and who may become aware of possible abuse and neglect.	Cleaner/Laundry Staff Catering Staff (including café staff) Office staff Estates Team Volunteers (CCF/Choir/Readers) Car park attendant. Spouses of boarding HM's. Invigilators IT Team Lifeguards	<b>90 mins safeguarding induction training with EW or JMK.</b>  (Channel via cylix)	<b>Bi-annually - Edited Cascade training.</b>  September - DSL Recorded session (Team Leaders to run session) covering: <ul style="list-style-type: none"> <li>• <u><i>Keeping Children Safe in Education (Annex A) (at each update)</i></u></li> <li>• KCSIE Document circulated and survey monkey quiz</li> <li>• County highlights</li> <li>• Safeguarding procedure reminder</li> </ul>
<b>Group 2</b>	Governors	Cylix Compliance Training – Safeguarding Essentials (60 mins)	September - DSL Recorded session (Team Leaders to run session) covering: <ul style="list-style-type: none"> <li>• <u><i>Keeping Children Safe in Education (Annex A) (at each update)</i></u></li> <li>• KCSIE Document circulated and survey monkey quiz</li> <li>• Termly Safeguarding update</li> </ul>
<b>Group 3</b> <b>Members of the workforce who work predominantly with young people, young people and/or their parents/carers and who could potentially contribute to assessing, planning, intervening and reviewing the needs of a child and parenting capacity where</b>	Teachers Sports coaches Careers advisor Language Assistants Graduate Assistants Mental Health Lead Deputy heads	<b>Full cascade pack (3 hours) Safeguarding Safeguarding induction training.</b>  (Channel/FGM etc)	<b>Three yearly – Cascade Training Pack</b> <b>Regular focus sessions on current topics</b>  September - DSL to deliver live session – covering: <ul style="list-style-type: none"> <li>• <u><i>Keeping Children Safe in Education (Full Part I, Annexe B) (at each update)</i></u></li> <li>• County highlights and procedure reminder.</li> <li>• KCSIE Document circulated and firefly quiz/paper questionnaire</li> </ul>

there are safeguarding concerns.	<p><u>Group 3a</u></p> <p>Staff with Residential access Matrons Playground supervisors, lunch assistants (Prep School) Learning Support (WSS &amp; WPS)/classroom assistants Marketing/Admissions Librarians Star Club Staff Mini bus drivers Science Technicians VMT</p>	<p><b>Full cascade pack (3 hours) Safeguarding induction training.</b></p> <p><b>(Channel/FGM etc)</b></p>	<ul style="list-style-type: none"> <li>• Sexual violence and Sexual Harm between children Document circulated and read.</li> <li>• Prep School to keep a register of WPS staff attending</li> </ul> <p><b>Two yearly full cascade training (JAN/Emily)</b> September - DSL Recorded session (Team Leaders to run session) covering:</p> <ul style="list-style-type: none"> <li>• <u>Keeping Children Safe in Education</u> <u>(Full part 1, Annexe B (at each update))</u></li> <li>• KCSIE Document circulated and survey monkey quiz</li> <li>• County highlights</li> <li>• Safeguarding procedure reminder.</li> </ul>
<p><b>Groups 4&amp;5</b></p> <p><b>Professional advisors, named and designated lead professionals</b></p>	<p>Deputy Des. Safeguarding Leads</p> <p>Designated Safeguarding Lead</p> <p>Safeguarding Governor</p> <p>Head</p>	<p><b>Full cascade pack (3 hours) Safeguarding Safeguarding induction training.</b></p> <p><b>(Channel/FGM etc)</b></p>	<p><b>Designated Safeguarding Lead Level 3 training on analysis and decision-making including interagency training (every 2 years)</b></p> <p><b>Group safeguarding supervision (once per half term)</b></p> <p><b>Read and understand Keeping Children Safe in Education (entire) (at each update)</b></p> <p><b>County DSL Updates – termly. DSL cascades to full safeguarding team.</b></p>

<b>Interview panels</b> - <b>EW to monitor</b>	Staff involved in interviewing potential volunteers and employees		<b>At least one member of staff on an interview panel must have received online Safer Recruitment training (every 3 years)</b>
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