Safeguarding Policy and Procedures

GIGGLESWICK SCHOOL

KEY PRINCIPLES OF SAFEGUARDING AT GIGGLESWICK

Giggleswick School ("the School") is committed to safeguarding and promoting the welfare of children and young people regardless of age, ability, race, culture, religion, sexuality or class. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children, their families and carers, has a role to play in safeguarding children. The School expects all staff, Governors, volunteers, parents and guardians to share in this commitment.

OUR GUIDING PRINCIPLES

1. Nothing is more important than keeping children safe. Safeguarding comes before anything else.

2. Everyone has a part to play. It is the job of every adult to play their part in making the School a community where young people are safe.

3. Everyone must be vigilant. We cannot be complacent – we know "it could happen here".

4. Everyone has an absolute duty to report concerns and ensure they are acted upon. This is a moral, professional and legal duty.

5. Concerns must be reported immediately. If we notice something that worries us, however small, we must not delay in reporting it.

CONCERNS ABOUT SAFEGUARDING PRACTICES: WHISTLEBLOWING

The School is committed to a culture of safety and of raising concerns about the wellbeing of its pupil body. The so-called Whistleblowing policy (available on the School's website and Staff Handbook on the school network) outlines the procedures by which concerns will be dealt with. All concerns brought to the attention of the School in good faith will be dealt with in accordance with published procedures and there will be no negative repercussions on those who bring forward such concerns. The School guarantees to review any poor or unsafe practices or potential failures in the safeguarding regime. It further undertakes to provide for mediation and dispute resolution where necessary and to provide any further training and support that is required. All concerns will be received and handled with appropriate transparency and accountability.

If someone has concerns about how a safeguarding or child protection issue is being dealt with then they can call the NSPCC Whistleblowing Helpline on 0800 028 0285 or email help@nspcc.org.uk for confidential advice.

The School promotes an open culture of safety and learning and encourages all members of the community to raise any concern as soon as it arises. A culture of reporting low level concerns is encouraged because it is essential in enabling reflection that improves practice. Those who raise concerns are valued and supported; they can expect a prompt and proportionate response.

All staff are made aware of the Whistleblowing and Low Level Concerns Policies as part of the induction process.

CHARITY COMMISSION GUIDANCE

As a registered charity, the School will always refer to Charity Commission guidance on safeguarding for trustees. Appendix E refers to actions trustees (Governors) should take to ensure good safeguarding governance.

The School is aware of its responsibilities around reporting serious incidents to the Charity Commission and follows the published guidance on the Charity Commission website. There is a useful online guide as to what constitutes a serious incident.

POLICY SCOPE

This policy applies to Giggleswick Senior, Junior and Pre-School. It is reviewed and updated annually (as a minimum) in accordance with Keeping Children Safe in Education (KCSIE: 2022). **It applies to all adults, including volunteers, working in or on behalf of the School.**

We are committed to ensuring the welfare and safety of all children in school. The School follows **North Yorkshire Safeguarding Children Partnership (NYSCP)** procedures. The School will, normally, endeavour to discuss all concerns with parents about their child/ren. However, there may be exceptional circumstances when the School will discuss concerns with Social Care and/or the Police without parental knowledge (in accordance with Child Protection procedures). The School will, of course, always aim to maintain a positive relationship with all parents. The School's Safeguarding Policy is available publicly on the School's website.

The School pays due regard to the recommendations of the Independent Inquiry into Child Sex Abuse (IICSA).

Full NYSCP procedures are available on their website, www.safeguardingchildren.co.uk, where a copy of the universal referral form can also be found.

Multi-agency Working in North Yorkshire

The School works in partnership with the North Yorkshire Safeguarding Children Partnership (NYSCP). Our school has a pivotal role to play in multi-agency safeguarding arrangements, and contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children 2018'.

The three statutory safeguarding partners (North Yorkshire Council, Health, and Police) have made arrangements to allow all schools and colleges in the local area to be fully engaged, involved and included in the new safeguarding arrangements. As a named relevant agency, we are under a statutory duty to co-operate with the published arrangements.

THE SCHOOL IS AWARE OF AND WILL ALWAYS ACT IN LINE WITH THE NYSCP POLICIES AND PROCEDURES AND PRACTICE GUIDANCE

This policy applies to everyone at Giggleswick Senior, Junior and Pre-School and every individual has a responsibility to raise any concern they have about a child with the relevant Designated Safeguarding Lead.

If at any point, there is a risk of immediate serious harm to a child a referral should be made to social care immediately.

Anybody can make a referral. You should inform the DSL as soon as possible that a referral has been made.

CONTACT DETAILS FOR REPORTING SAFEGUARDING CONCERNS

Our Designated Safeguarding Leads (DSL) are Christian San Jose (Senior School) and James Mundell (Junior School). They are the first point of contact for any safeguarding matter relating to pupils. If they are not available, you should contact one of the Deputy DSLs as listed below. If for any reason, contact fails, and you are concerned that a pupil is in immediate danger please contact Children's Services directly (details below).

During term time, the Designated Safeguarding Leads and/or a Deputy is always available for staff in the School to discuss safeguarding concerns. Appropriate cover arrangements are made if the DSL is off-site and for out of term activities.

IF YOU THINK A CHILD IS IN IMMEDIATE DANGER, CALL THE POLICE ON 999	
For any information relating to safeguarding concerns that is **non-urgent**, please email safeguarding@giggleswick.org.uk This email account is monitored by the DSL.	

Designated Safeguarding Leads (DSL)	**Christian San Jose** **Deputy Head** csanjose@giggleswick.org.uk 07389 182296 (mobile) 01729 893007 (office)	Carries the legal duty for all Safeguarding and Child Protection matters To report concerns about pupils or to ask advice
	James Mundell[1] **Head of the Junior School** jrmundell@giggleswick.org.uk 01729 893100 (office)	To report concerns about pupils or to ask advice (relating to the Junior School)
Designated Safeguarding Practitioner (Early Years)	**Carl Shuttleworth** **Pre-School Manager and Junior School Assistant Head** cbshuttleworth@giggleswick.org.uk 01729 893110 (office)	Carries the legal duty for all Safeguarding and Child Protection matters in the Early Years/Pre-school). The deputy designated person is James Mundell To report concerns about pupils or to ask advice (relating to Mill House)
Deputy Designated Safeguarding Leads (Deputy DSLs)	**Emma-Jane Wharton** ejwharton@giggleswick.org.uk 01729 893192 (office)	To report concerns about pupils or to ask advice (particularly in the absence of the DSL)
	Christine Gemmell cgemmell@giggleswick.org.uk	

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[1] Concerns about the Head of the Junior School should be passed to the Headmaster (of the Senior School).

	Hannah Wright mhwright@giggleswick.org.uk 01729 893020 (office) 07988 425844 (mobile)	
Headmaster	**Sam Hart** sehart@giggleswick.org.uk 01729 893005 (office)	To report concerns about a member of staff
Nominated Safeguarding Governor	**Andrew Jarman** jarman67@yahoo.com OR safeguardinggovernor@giggleswick.org.uk	To report concerns about the Headmaster, or about the School's safeguarding practices
Chair of Governors	**Alex Thursby** chairofgovernors@giggleswick.org.uk	
Independent Person	**Gilly Harper** gilly@zimzam.tv 07788 494042 (mobile)	A person independent of the school staff, with whom pupils may raise concerns they do not feel confident to raise directly with the school

EXTERNAL CONTACT DETAILS

North Yorkshire Social Care (Multi-Agency Screening Team)	Monday to Friday 8am-5.30pm 0300 131 2 131 children&families@northyorks.gov.uk	If you have concerns about a person and you wish to speak to someone or make a referral https://www.safeguardingchildren.co.uk/about-us/worried-about-a-child/
North Yorkshire Social Care (Multi-Agency Screening Team) – Professional Consultation Line	Monday to Friday 10am-4pm 01609 535070	When contacting the North Yorkshire Multi-Agency Screening Team (MAST) for a consultation you will be put through to a qualified social worker where your query will be discussed, with the child's details remaining anonymous
Emergency Duty Team	All hours 0300 131 2 131 edt@northyorks.gov.uk	For access to urgent social care support or if you have a social care emergency
Early Help – West (Craven)	01609 534842 earlyhelpwest@northyorks.gov.uk	https://www.northyorks.gov.uk/info/children-and-families-early-help-offer
North Yorkshire Safeguarding Children Partnership (NYSCP)	01609 535123 nyscp@northyorks.gov.uk	
LADO team for Harrogate and Craven	01609 533080 (LADO team) lado@northyorks.gov.uk LADO Manager: Susan Crawford Julie Kaye, Andy Kenyon, Marie Pettman	To make a referral relating to concerns about a member of staff https://www.safeguardingchildren.co.uk/professionals/procedures-practice-guidance-and-one-minute-guides/managing-allegations-against-those-who-work-or-volunteer-with-children/
North Yorkshire Children Missing in Education (CME)	CME Coordinator Julie Hodges Julie.hodges@northyorks.gov.uk CME.coordinator@northyorks.gov.uk 01609 532477	To discuss children resident in North Yorkshire who may be missing from education
North Yorkshire Police	101 (non-emergency)	When to call the police

DfE dedicated telephone helpline	020 7340 7264 Monday to Friday from 11am to 3pm counter.extremism@education.gov.uk 0800 789 321 (Anti-terrorism hotline)	For non-emergency advice for staff and governors concerning extremism and radicalisation
NSPCC Whistleblowing Advice Line	0800 028 0285 help@nspcc.org.uk	Available for staff who do not feel able to raise concerns regarding child protection internally
Government Forced Marriage Unit	020 7008 0151 fmu@fcdo.gov.uk	To report concerns or seek advice if you suspect that a child is at risk of forced marriage
NSPCC FGM helpline	0800 028 3550 Fgm.help@nspcc.org.uk	For advice on suspected cases of FGM
North Yorkshire Prevent Team	101 (Police and ask for Prevent) prevent@northyorkshire.police.uk preventenquiries@northyorks.gov.uk Sgt Ben Hallewell Prevent - Central Area Counter Terrorism Policing North East 01609 643580 07741175858 Ben.hallewell@northyorkshire.police.uk	To make a direct referral to the Prevent programme Sgt Ben Hallewell for advice regarding CTLP and Prevent policy and risk assessment
National Prevent helpline	0800 011 3764	To make a direct referral to the Prevent programme
Operation Encompass Helpline	Teachers' National Helpline 0204 513 9990 Monday to Friday, 8am-1pm	To access advice from an Educational Psychologist in support of a child who has experienced domestic violence in their home
CAMHS North Yorkshire	0300 013 4778 Monday to Friday, 9am-5pm	For all routine referrals and advice relating to mental health in children
CAMHS Crisis and Liaison Team – First Response (Craven District)	01274 221181 (all hours)	In a mental health emergency

North Yorkshire Compass Phoenix	01904 661916 phoenix@compass-uk.org	A service specific to North Yorkshire offering professionals advice and guidance on young people's mental health needs Referrals can be made here https://www.compass-uk.org/wp-content/uploads/2022/06/Compass-Phoenix-Referral-Form.docx
Disclosure and Barring Service	DBS Customer Services PO Box 3961 Royal Wootton Bassett SN4 4HF 03000 200 190 customerservices@dbs.gov.uk	If an allegation against a teacher is in any way connected to the risk of harm, or actual harm, to a child (safeguarding) then a referral should be made to the Disclosure and Barring Service (DBS). If misconduct and safeguarding are both involved, or if there is any doubt, referral should be made to both the DBS and TRA. Further information relating to referrals to the DBS can be found on its website: www.gov.uk/government/organisations/disclosure-and-barring-service
Teacher Regulation Agency	Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT 0207 593 5393 misconduct.teacher@education.gov.uk	

NB: The local authority listed above represent the majority of our pupils. The School will contact whichever authority is relevant to the pupil concerned. This may be especially relevant in the case of boarding pupils.

ABBREVIATIONS USED IN THIS POLICY

CCE   Child Criminal Exploitation
Grooming and using young people for criminal (often drugs-related) activity.

CPOMS   Software used at Giggleswick to store and manage safeguarding concerns

CPD   Continuing Professional Development

CSE   Child Sexual Exploitation
The coercion of any child into engaging in sexual activities – it is a form of child sexual abuse.

DBS   Disclosure and Barring Service
The government agency which checks applications to work with children, to ensure applicants are fit to safe with young people.

DfE   Department for Education

DSL   Designated Safeguarding Lead
The person with ultimate responsibility for safeguarding in the School.

FGM   Female Genital Mutilation

GDPR   General Data Protection Regulation (2018)

HBV   Honour-Based Violence

HR   Human Resources (Department)

KCSIE   Keeping Children Safe in Education (2022)
The Government document which outlines schools' safeguarding responsibilities.

LAC   Looked After Child
Child who is under the care of the Local Authority.

LADO   Local Authority Designated Officer
A safeguarding officer at the Local Authority who provides guidance to schools managing concerns about members of staff.

NY MAST   Multi Agency Safeguarding Team
The 'front door' of Social Services – the MAST is the team which receives and assesses all new referrals.

NSPCC   National Society for the Prevention of Cruelty to Children

Prevent   A duty under the Counter-Terrorism and Security Act (2015) to take measures to prevent people from being drawn into terrorism.

TRA   Teaching Regulation Agency
The body that referrals are made to if a teacher is dismissed because of serious misconduct.

YPSI   Youth Produced Sexual Imagery
Consensual and non-consensual sharing of nude and semi-nude images and/or videos.

CONTENTS

1   PROVIDING A SAFE ENVIRONMENT

1.1   Commitment

The School is committed to safeguarding and promoting the welfare of all its pupils and expects all staff and volunteers to share this commitment by complying with the School's Safeguarding Policy and Procedures and the Staff Code of Conduct at all times. Safeguarding is the individual responsibility of everyone, and everyone has a part to play. Duties outlined in this policy apply to every adult employed by the school, and to anyone living or working on school premises. This includes Governors, visitors, agency or supply staff, and unpaid volunteers

When official guidance talks about a 'child', it generally means anyone who has not yet reached their 18th birthday. However, this policy covers every Giggleswick pupil, whatever their age. If they are a pupil at Giggleswick, the School has a duty to ensure they are safe.

The policy is available on the School website for anyone who wishes to view it.

1.2   What is Child Protection and Safeguarding?

When we talk about **safeguarding**, we mean things which are done to reduce the risk of children suffering significant harm. This includes:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

Child Protection is a part of safeguarding. It means actions which protect children who could suffer significant harm.

1.3   Core Principles

The School's commitment to children who are at risk of harm is to:

- **Recognise** signs that a child is at risk.
- **Respond** to the child's needs in a timely and appropriate way.
- **Report** our concerns to the Safeguarding Team.
- **Refer** to internal and external agencies that can protect and support the child.

There are thus four key elements to this policy:

- **Prevention**
    - o   We will provide an environment where all children feel secure, are encouraged to talk and are listened to. We will raise awareness of safeguarding issues and equip children with skills they need to keep them safe. When appointing staff and volunteers, we will practise safer recruitment procedures.
- **Protection**
    - o   We will ensure all staff and volunteers have an up-to-date DBS check, know their safeguarding responsibilities, and are supported to respond appropriately to safeguarding concerns. We will ensure that contractors and other visitors are appropriately checked and supervised at all times.
- **Support**
    - o   We will provide support for children who are at risk of harm, or have suffered abuse, in accordance with their agreed safeguarding plan.

- **Working with others**
  - o We will ensure every effort is made to establish effective working relationships with parents, guardians, colleagues from the three safeguarding partners (local authorities, clinical commissioning groups and the police) and other agencies.

1.4   Contextual Safeguarding

The School endeavours to apply the insights of a contextual safeguarding to its practice. Contextual safeguarding is a model which recognises that children's lives are shaped by multiple contexts, of which school is only one. In responding to a child's needs, the School must therefore understand not only their experience at Giggleswick, but also the family, friendship, neighbourhood, and online 'worlds' they inhabit.

The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

1.5   Inter-Agency Procedures

In its efforts to safeguard and promote the welfare of children, the School takes account of the most recent legislation and guidance and operates within locally-agreed inter-agency procedures.

While the School would like to think that all young people are loved, cared for and supported by the people around them, this is not always the case. In working with children, the School will always be mindful of the possibility that 'it could happen here'.

1.6   Creating a Safe Culture

The School takes its responsibility to establish a safe environment, in which children can learn and develop, seriously. The School is acutely aware that boarders have a greater vulnerability with regards to safeguarding risks, which is why we place this policy in the highest of regard.

While policies, systems and processes are all necessary, the highest priority is to create a school culture with safeguarding at its heart. This includes putting the welfare of young people above everything else; building an open, tolerant and inclusive ethos; working to involve staff, pupils and parents in the safeguarding 'team'; challenging barriers of hierarchy or trust which make people reluctant to report concerns; and being willing to learn lessons when things go wrong.

The School strives to build a strong culture in which members of the community behave caringly and respectfully towards each other. The School's pastoral systems ensure pupils receive regular guidance on how to keep themselves safe and manage risk. The role of boarding staff is especially important in this regard.

The School recognises that the boarding environment has inherent risks for which it must compensate. These include pupils who have more limited contact with parents than nonboarders; an intense, and potentially 'closed' community where unhealthy 'traditional' hierarchies and attitudes could exist; and pupils living in close proximity to staff, leading to poorly-defined boundaries in both physical space and relationships. The School is explicit about all of these issues in staff training, and offers regular advice to mitigate potential problems.

The School implements clear anti-bullying policies and encourages pupils to speak to a member of staff of their choosing about any worries they may have. House noticeboards and regular briefings make pupils aware of where they can find help and advice, both within the School and outside.

To support the creation of a safe culture, the School implements robust policies for issues such as bullying, drugs and alcohol, and online safety. These may be found on the policies page of the [School's website](#).

1.7   Relevant Documentation

This policy is only part of the School's efforts to keep children safe. It should be read alongside relevant legislation, statutory guidance, best-practice advice and the School's internal policies.

Specific guidance on the use of social media, mobile phones, cameras and mobile devices are incorporated into the eSafety User Agreement, the Staff Code of Conduct and the Early Years' Mobile Phone & Social Networking Policies. These documents also refer to use of images (moving and still) with particular reference to social networking sites. The School has a separate Missing Pupil Policy.

Key documents are listed in Appendix G.

1.8   How The School Supports Pupils and Informs Them to Keep Themselves Safe

The School is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable, how they can keep themselves safe and how to raise concerns.

Through the PSHE (Personal, Social, Health and Economic education) programme, pupils are reminded of their right to be listened to and they are made aware of sources of external help and information. Issues such as developing healthy relationships, awareness of domestic violence, bullying and abuse, recognising and managing risks including online and sexual exploitation, dealing with stress, positive body image, and mental health & wellbeing are all included in the PSHE scheme of work. This is based on the guidance within *Relationships Education, Relationships and Sex Education (RSE) and Health Education* (DfE, 2021). Pupils are made aware of how to be safe and responsible users of new technologies (online safety training) and the impact of new technologies on sexual behaviour (for example, the sharing of nudes or semi-nudes) during PSHE and computing lessons. The School draws on recommended resources for teaching from the PSHE Association and other accredited organisations.

To safeguard children from accessing potentially harmful and inappropriate online material the School ensures that, in addition to teaching pupils how to keep themselves safe online (using guidance from *Teaching Online Safety in School* (DfE, June 2019)), appropriate filters and monitoring systems are in place on the School's network, software and devices. The School uses *Securly*, which prevents children accessing inappropriate websites through the School's computer network. Monitoring systems are also in place to alert staff to any inappropriate sites which might be visited.

All pupils are told that we have a senior member of staff with responsibility for safeguarding and child protection and who that is. In the Junior School, a poster '*Who can I turn to*?' is in each form room. In the Senior School, the '*Where do I turn*?' poster informs pupils to whom they might talk to both in and out of school. The role of the Independent Person and other sources of help and advice are promoted to pupils.

The School liaises with other agencies that support the pupil such as Social Care and Child & Adolescent Mental Health Services (CAMHS) and has engaged the services of a Clinical Psychologist and a Counsellor.

Children will always be given a proper explanation (appropriate to age and understanding) of what action is taken on their behalf and why.

1.9 How The School Supports Parents in Keeping Their Children Safe

The School shares a purpose with parents to keep children safe from harm and to promote their welfare. The School is committed to working with parents openly and honestly and always aims to maintain a positive relationship with all parents.

The School will share with parents any concerns it may have about their child unless to do so may place a child at risk of harm. In these exceptional circumstances, the School will make referrals to Social Care and/or the Police without consultation with parents. The School will make every effort to maintain a positive and supportive relationship with parents whilst fulfilling its duties to protect any child.

If an allegation involves a member of staff, parents should only be informed with the LADO's consent. For the avoidance of doubt, referrals to Social Services or the LADO do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

The School has a programme for educating parents on key aspects of the PSHE curriculum which link into keeping children safe from dangers on and offline. At each parent conference, an age-appropriate seminar is held on subjects ranging from online safety to drugs/alcohol/substance abuse and healthy relationships. In the weekly In Touch newsletter sent to all parents and guardians, key topics for discussion are included so that they may elect to continue conversations with their children at home. Occasionally, specific guidance is issued relating to key topics – this may include signposting sources of information or support.

We encourage parents to discuss any concerns they may have with the DSL, Headmaster or Head of the Junior School.

1.10 Teaching Children How to Stay Safe Online

Digital and online technologies are integral to the lives of young people, within school and outside. They bring many personal and educational benefits, but also present risks. Any form of harm that a young person may experience in the physical world has its online equivalent and it is vital that staff have a good understanding of pupils' online world.

The breadth of online safety risks is considerable, but can be categorised into four areas:

- **Content**
  Being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact**
  Being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct**
  Online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- **Commerce**
  Risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The School takes seriously its obligations to teach pupils how to keep safe, particularly when online. The use of mobile technology around the campus is restricted. The Junior School, including the Pre-School, is a mobile-free zone for staff and visitors, so only school-provided

devices can be used in areas where there are children (they are permitted in office spaces and common rooms). In the senior school, mobiles are not permitted in public areas during school learning hours (0820-1800), and are not allowed in certain areas (e.g. dining hall, Chapel) at any time. Wi-Fi is turned off at night times and boarding pupils from Year 11 and below hand in their devices (including mobile phones) before going to bed.

Because we are using devices for learning we do not generally restrict use of technology, except for younger years and at certain times. Instead, we monitor use and promote safe use through our curriculum.

Mill House Pre-School and the Junior School has restricted access to the internet, as referenced in the **Online Safety Policy**, and the Senior School internet access is monitored and restricted. There is additional information in the School's Online Safety Policy.

Further mobile phone restrictions are applicable for the school's Early Years, as noted in the Mill House Use of Mobile Device Policy. These restrict the use of mobile devices and cameras to those which belong to the setting. In addition, all staff must not bring their own personal devices into the setting, and they must be stored away from the children.

Our staff are aware of the signs of cyberbullying and other online risks. Our pupils are taught about safeguarding themselves online through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. The curriculum references the four areas of risk: content, contact, conduct and commerce. Pupils are taught to recognise when they are at risk and how to get help when they need it. Opportunities are provided to learn about online safety within a range of curriculum areas and specifically Computing lessons. Educating pupils on the dangers of technologies that may be encountered outside school is also be carried out via PSHE and Computing lessons, by presentations in assemblies, themed events (such as Safer Internet Day) as well as informally when opportunities arise.

At age-appropriate levels, and via PSHE and Computing, pupils are taught about their e-safety responsibilities and to look after their own online safety. From Year 7 pupils are taught about recognising online sexual exploitation, stalking and grooming, the risks, and of their duty to report any such instances they or their peers come across. Pupils are strongly encouraged to approach their Head of House, tutor or the Deputy Head at the Senior School, or form tutor or Head of Junior School, as well as parents, peers and other school staff for advice or help if they experience problems when using the internet and related technologies.

There may sometimes be a need for staff to teach or have pastoral contact with pupils online (e.g. by a video-conferencing application such as Teams). Staff should follow the Guidelines for Online Learning published in the Online Safety Policy to ensure they do this safely.

Staff who interact with children online must 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 document and report that concern to the DSL or to a Deputy DSL.

1.11 Early Help and Who it Would Benefit

Early Help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later.

Some children may be particularly vulnerable, and it is important that staff are particularly alert to the potential need for early help where a child[2]:

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[2] Chapter 1 of *Working Together to Safeguard Children* provides detailed guidance on the early help process. The North Yorkshire Early Help website also provides information specific to our Local Authority. A useful introductory video on the NYSCP Early Help subsite can be found here.

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory Education, Health and 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;
- Has a parent/carer in custody.

In North Yorkshire, Early Help is a collaborative approach, not a provision. All children and young people will receive universal services; however, some children and young people because of their needs or circumstances will require extra support to achieve their potential. Therefore, the purpose of Early Help is to work together to resolve problems before they become overwhelming, long term and costly to the child, young person, family and the wider community.

All staff should be aware of the Early Help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals, and, in some cases, acting as the lead professional in undertaking an early help assessment.

1.12 Children Who May be Particularly Vulnerable

Some children may be at increased risk of neglect or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination; social isolation or exclusion; communication issues; and the fact that some adults are reluctant to accept abuse happens or have a high level of tolerance of neglect.

Where a child is identified as needing special consideration and attention, this will be provided through the School's pastoral systems:

- House staff, along with Townhead Surgery, nursing and counselling staff will be made aware of the child's potential vulnerability.
- The Pastoral Support Group[3] (which includes the Deputy Head, Lead Nurse, Counsellor, School Doctor and where appropriate, Learning Support Coordinator, the Chaplain, Deputy DSLs and Senior House Staff) will ensure there is effective coordination between the School's medical and pastoral teams.
- Other resources, including Learning Support, clinical and educational psychologists linked to the School and the support of external agencies may be involved in providing support.

1.13 Children Needing Special Consideration

To ensure all children receive equal protection, we will give special consideration and attention to those who are:

- Disabled or have special educational needs (SEND);

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[3] The Pastoral Group meets once a week and discusses children who have been identified as needing additional support or attention.

- Young carers;
- Living in a situation of domestic abuse;
- Affected by parental substance misuse;
- Asylum seekers;
- Living permanently away from home;
- Vulnerable to being bullied, or engaging in bullying;
- Living in temporary accommodation;
- Living transient lifestyles;
- Living in chaotic, neglectful or unsupportive home situations;
- Vulnerable to discrimination on the grounds of race, ethnicity, gender, religion or sexuality;
- Involved directly or indirectly in prostitution or child-trafficking;
- Do not have English as a first language;
- Children who are, or have ever been, 'Looked After' Children, or children in care. This includes those who are subject to a care order or temporarily classed as looked-after on a planned basis for short breaks or respite care.
- Children who are already known to Social Services as Children in Need or on a child protection plan.

1.14 Children With Special Educational Needs and Disabilities

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- Children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs; and
- Difficulties may arise in overcoming communication barriers.

The School identifies pupils who might need more support to be kept safe or to keep themselves safe by writing Individual Welfare Plans (IWPs) and Learning Plans (LAMPs), and sharing them with all the staff who will come into contact with the child – this is done via the weekly Pastoral Bulletin for staff and via the Staff sharepoint. IWPs and LAMPs are also shared with the parents/guardians (where appropriate).

1.15 Children With Mental Health Needs

A mental health issue which is significant enough to pose a risk to a child's safety or long-term progress may amount to a safeguarding concern in its own right. Staff should also be aware that in some cases mental health problems may be an indicator a child has suffered or is at risk of suffering abuse, neglect or exploitation. 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 important that staff are aware of how these children's experiences can impact on their behaviour and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, other staff are well placed to observe children day-to-day and identify any whose behaviour suggests that they are experiencing a mental health problem or at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by reporting this to the Safeguarding Team.

1.16 Children Missing Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school 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 can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. The School monitors attendance carefully and addresses poor or irregular attendance without delay.

The School will always follow up with parents/carers when pupils are not at school. This means there need to be at least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more.

The School follows the NYSCP procedures with regard to "Children Missing from Education", so parents have a responsibility to inform the School of reasons for absence. If a pupil is withdrawn from the school, they must notify the School immediately of the name of the new school at which the pupil is registered and the date on which they are due to start. Should any pupil leave the School without parents giving us these details the School has a duty to inform the local authority.

In response to the guidance in Keeping Children Safe in Education (2022) the School has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions)
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - o leave school to be home educated;
  - o move away from the school's location;
  - o remain medically unfit beyond compulsory school age;
  - o are in custody for four months or more (and will not return to school afterwards); or
  - o are permanently excluded.

The School will ensure that pupils who are expected to attend the School, but fail to take up the place will be referred to the local authority. When a pupil leaves the School, the name of the pupil's new school and their expected start date will be recorded on the Admission Register.

Elective Home Education (EHE)

The School recognises that many home educated children have a positive learning experience, but it can also mean that some children are less visible to services that are there to keep them safe. The School follows local arrangements where parents express their intention to remove a child from school (NYCC Elective Home Education Policy and Procedures).

1.17 Private Fostering, Looked After Children and Children Involved with Social Care

1.17.1 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

All staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The School itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, the School will take steps to verify the relationship of the adults to the child who is being registered.

1.17.2 Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The School will hold information in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. The School will hold the name of the child's social worker.

1.17.3 Children Involved with Social Care

The School recognises that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

The School takes these needs into account when making plans to support pupils who have a social worker, such as identifying risks via IWPs, alternate funding arrangements, and additional communication channels and points of contact.

1.18 Early Years Provision Safeguarding Arrangements

1.18.1 Disqualification from Working in Childcare

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

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

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

1.18.2 Use of Mobile Phones and Cameras

The School's policy on the use of mobile phones and cameras can be found in the School's Use of Mobile Devices Policy. At their first visit, volunteers and visitors are given information informing them they are not permitted to use personal mobile phone cameras on the premises. Use of mobile devices to take calls should be done discreetly during the school day and avoided within boarding houses; emergency calls may be taken in house offices. Neither volunteers nor visitors are permitted to take photographs or recordings of the children without permission. Staff are allowed to use their mobile phones or technological devices in the staffroom or office during breaks and non-contact time. Use around the campus must be restricted to safeguard pupils and to encourage appropriate use by pupils.

In the Junior School, staff may bring mobile phones into work for their own personal use. However, they must only be used during non-contact with children.

At Mill House Pre-School, staff must keep personal devices in the staff lockers at all times and must never be used in a room where any children are or have access to. If staff need to make an emergency call, they must do so in the Mill House office or Junior School staff room. At Mill House events (e.g. concerts, sports day), parents are reminded that any photos taken of their own children are for their use only and should not be uploaded onto social media.

1.19 Duty to Notify Ofsted

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

1.20 Safer Recruitment

The School takes seriously its responsibility to recruit staff, Governors, contractors and volunteers who are suitable to work with children. The first step to safeguarding all pupils is to appoint staff who share the School's commitment to the welfare of the pupils. The Recruitment Policy can be found on the School's website.

The School undertakes a rigorous recruitment and screening process, which is in line with the Independent Schools' Inspectorate, Keeping Children Safe in Education and National Minimum Boarding Standards regulations. The Human Resources team and other key staff who manage this process are trained in safer recruitment procedures.

The School takes all reasonable measures to:

- Ensure that it practises safer recruitment in checking the suitability of staff and volunteers;
- (including staff employed by another organisation) Work with children and young people in accordance with the guidance given in Keeping Children Safe in Education (September 2022) and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the school's Recruitment Policy;
- Ensure that it carries out all necessary checks on the suitability of people who serve as Governors in accordance with the above regulations and guidance given in Keeping Children Safe in Education (September 2022); and
- Ensure that where staff from another organisation are working with our pupils either on school property or on another site, the School has received confirmation that appropriate child protection checks and procedures apply to those staff and that such checks do not raise any issues of concern in relation to the suitability of those staff members to work with children.

The HR Manager is responsible for ensuring that all members of staff are recruited following the procedures defined in Part 3 of KCSIE (2022). This is done in accordance with the School's Recruitment Policy. The HR Manager will ensure that the recruitment checks of all employees are retained on the School's Single Central Register.

Additionally, the HR Manager will ensure that individuals who are engaged in regulated activity with children, including volunteers and those employed by third parties, undergo the appropriate recruitment checks and are included on the Single Central Register where required.

The Single Central Register is subject to a termly inspection by the Safeguarding Governor. The DSL and Headmaster also conduct regular checks of staff files against the SCR in term time.

1.21 Agency or Third-Party Staff

The School obtains written notification from any agency, or third party organisation, that they have carried out the checks on an individual who will be working at the School that the School would otherwise perform. The DSL works closely with the School's Catering Manager to ensure that individuals employed by Holroyd Howe to work in the School's Catering Department are suitable to work with children and that prior checks that have flagged any issues are addressed before an offer of employment is made.

In respect of the enhanced DBS check, the School ensures that written notification confirms the certificate has been obtained by either the employment business or another such business.

1.22 External School Lets

External organisations using School facilities for programmes that include children are required by the School to confirm that they have their own Child Protection policy in place, as part of their conditions of hire. The Bursar is responsible, through the Lettings Manager, for overseeing this process.

2   ROLES, RESPONSIBILITIES AND THE MANAGEMENT OF SAFEGUARDING

2.1   The DSL and DDSLs

The person with primary responsibility for Child Protection and Safeguarding matters at the School is the DSL, Christian San Jose. He is assisted by a team of Deputy DSLs: Emma-Jane Wharton, Hannah Wright and Christine Gemmell, to whom particular tasks (but not ultimate lead responsibility) may be delegated. The DSL with primary responsibility for safeguarding matters at the Junior School is James Mundell and for Early Years at Mill House, it is Carl Shuttleworth.

The Deputy DSLs are trained to the same level as the DSL. The DSL or Deputy DSL is the first point of contact for all matters of child protection. All concerns and queries must be reported to them.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy.

Where a pupil leaves the School, 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 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 will 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.

The DSL regularly reviews the School's practices relating to pupil welfare and safeguarding matters. Regular Safeguarding Team meetings are held each term (twice every half term) and used to review recent cases and lessons learnt. Training calendars for staff are reviewed as is the training of the Safeguarding Team.

A member of the Safeguarding Team is available at all times during the School term, including overnight, and whenever a School trip takes place during School holidays. If a DSL (or Deputy DSL) is not available in person, they can be contacted using the contact details at the start of this policy. For out of term activities, the School's arrangements will be published as required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of KCSIE (2022) and a detailed description of the DSL's role is given in Appendix B of this policy.

2.2   The Headmaster

The Headmaster, either in person or by delegation, will:

- Ensure the policies and procedures adopted by the Governing Body particularly concerning referrals of cases of suspected abuse and neglect are fully implemented and followed by all staff, pupils and visitors.
- In the event of allegations of abuse being made against a member of staff or a volunteer, liaise with the LADO at the local authority and partner agencies for child protection concerns (all cases which concern a staff member or volunteer).
- Refer cases where a crime may have been committed to the Police as required.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required. Also, that prompt referral is made to the Teaching Regulation Agency and other regulatory/advisory bodies, if appropriate.
- Promote a strong culture of safeguarding across the School.
- Foster a culture where all staff feel able to raise concerns about poor practice; and ensure that any concerns are handled sensitively and in accordance with whistleblowing procedures.
- Ensure pupils have regular opportunities to learn about safeguarding, including keeping themselves safe online.

To enable him to fulfil these responsibilities, the Headmaster is trained to the same level as the DSL.

2.3   All Staff and Volunteers

Everyone who works at the School has a role to play in keeping children safe. It is the responsibility of every employee and volunteer to:

- Act at all times in the best interests of the child.
- Complete induction in safeguarding at the start of their career at the School.
- Fully comply with the school's policies and procedures, including reading at least part one of KCSIE 2022, this safeguarding policy and the staff code of conduct and any subsequent amendments. They must confirm they have done so.
- Attend appropriate training. This includes mandatory attendance annually at September INSET relating to safeguarding updates, Prevent training and that in online safety, in line with NYSCP advice.
- Be aware of the signs of abuse and neglect so they can identify children at risk of harm
- Inform the DSL or a Deputy DSL of any concerns as soon as they arise.
- Keep an adequate record of any significant complaint, conversation or event.
- Self-refer any concerns they have with regard to the staff code of conduct.
- Refer concerns about another member of staff or volunteer to the Headmaster or DSL.
- Refer concerns about the Headmaster to the Chair of Governors.
- Be aware of the Early Help process.
- Inform the DSL if they become aware that a pupil may be in a private fostering arrangement (i.e. provided with care and accommodation by someone to whom they are not related in that person's home).
- Raise concerns about poor or unsafe practice via the school's whistleblowing procedures.
- Have due regard to the duty to prevent people from being drawn into terrorism; report known cases of female genital mutilation and to follow procedures when a child goes missing from education.
- Not assume a colleague or another professional will take action and share information that might be critical in keeping children safe and be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.
- Speak to the DSL or Deputy DSL with regard to any concerns about FGM and be aware that there is a specific legal duty on teachers, if, in the course of their work in the profession, they discover that an act of FGM appears to have been carried out on a girl under the age of 18, and that they must report this to the police.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues.

2.4   The Governing Body

The School's Governing Body has a strategic leadership responsibility for the School's safeguarding arrangements. As a body, its duty is to facilitate a whole school approach to safeguarding, ensuring safeguarding and child protection underpin all relevant aspects of process and policy development so that all systems, processes and policies operate with the best interests of the child at heart. A full description of the Governing Body's duties can be found in Part 2 of KCSIE 2022 and at Appendix C to this policy.

2.5   The Designated Safeguarding Governor

While retaining corporate responsibility, the trustee body designates an individual as Safeguarding Governor. This is currently Andrew Jarman. The Designated Safeguarding Governor's responsibilities include:

- Liaison with the DSL and the provision of advice and guidance on safeguarding matters as appropriate.
- Undertaking training for Nominated Safeguarding Governors, and being familiar with current safeguarding regulations.
- Retaining an oversight of the annual and mid-year safeguarding reviews authored by the DSL for presentation to Governing Body meetings.
- Assuring Governors that pupils are safe, regulatory requirements met, and any necessary improvements implemented.
- Liaison (under delegation from the Chairman) with the LADO and partner agencies, in the event of allegations made against the Headmaster or a Governor.

2.6   The Independent Person for Pupils (formally Independent Listener)

The Independent Person (previously known as the Independent Listener) is a person independent of the school who can be contacted by any pupil wishing to raise a matter of concern they do not feel confident to share directly with the School. Contact details are widely advertised on pupil noticeboards. The Independent Person is currently Mrs Gilly Harper.

The Independent Person will report any concerns raised promptly to the most appropriate person or agency. Depending on the nature of the concern raised, this may include the School DSL or external agencies. The Independent Person will preserve the confidentiality of the person raising the concern, so far as possible, but cannot promise absolute secrecy for any safeguarding concern.

Further details can be found in the School's Independent Person Policy published on the School website.

2.7   Key Supporting Staff Roles

The School Nurses, Counsellor, and Learning Support Coordinator play a key role in the School's safeguarding structure. While they are party to sensitive information, they must be confident in sharing relevant information, ideally (but not exclusively) with pupil consent, with the DSLs, Deputy DSLs and appropriate pastoral staff (including the SLT and Senior House Staff). The School also acknowledges that the School Nurses' support in safeguarding children is guided by the NMC's document: *The Code – Professional Standards of Practice and Behaviour for Nurses, Midwives and Nursing Associates*. In instances where sharing information in the school setting appears to contradict The Code's guidance, the DSL should be consulted and the responsibility for whether to share sensitive information with key pastoral staff passed to them.

2.8 Training

All staff members (including volunteers) undergo safeguarding and child protection training at induction, and this is recorded. This training is regularly updated. Induction and training is in line with advice from NYSCP. Regular safeguarding updates are provided as required but at least annually, through email, staff meetings and termly bulletins.

Induction training for all new staff includes:

- The role and the identity of the DSL, Deputies & Nominated Governor
- Copies of this Safeguarding Policy & Procedure and the Staff Code of Conduct (including procedures to deal with child on child abuse)
- The Whistleblowing Policy
- The safeguarding response to children who go missing from education
- What to do if you are worried a child is being abused (DfE, 2015)
- E-Safety Policy
- Equal Opportunities Policy
- The School Rules
- Behaviour & Exclusions Policy
- Anti-Bullying Policy (including measures to prevent bullying, cyberbullying, prejudice-based and discriminatory behaviour)
- A copy of Part 1 of KCSIE 2022 and Annex B
- A signed acknowledgment of receipt and understanding of this information

During the induction process, the DSL provides details of online safety training. The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils (as per the Staff Code of Conduct). Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Volunteers are provided with safeguarding induction training that includes:
- The School's Safeguarding Policy
- Part 1 and Annex B of Keeping Children Safe In Education (2022)
- The identity and contact details of the DSL and DDSLs
- Brief guidance notes on our expectations of their behaviour around pupils

Contractors or visitors to the School receive, as a minimum, the identity and contact details of the DSL and guidance on what to do if they are concerned about a child or a safeguarding practice at the School.

All staff receive training in safeguarding and child protection regularly. Training includes online safety and harmful sexual behaviours (including child on child sexual violence and harassment). It also includes Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to challenge extremist ideas and know how to refer children for further help.

The Designated Safeguarding Leads and Deputies undergo inter-agency training at least every 2 years, usually through the NYSCP. This training includes inter-agency working, participation in child protection case conferences, supporting children in need, record keeping and promoting a positive safeguarding culture where children are listened to. They are responsible for ensuring that all new staff and volunteers in their section are introduced to the school's Safeguarding & Child Protection Policy and Procedures during induction.

In addition to this formal training, the knowledge and skills of the DSLs is updated (for example by meeting other safeguarding leads, taking time to read and digest safeguarding developments and reading NYSCP bulletins) at regular intervals, but at least annually, to keep up with developments relevant to their role. In particular, the School supports the DSL in developing their knowledge and skills to understand the views of children and taking account of their wishes, as well as having an awareness of the difficulties children may face in

approaching staff with a disclosure. The DSL attends North Yorkshire Independent School DSL networking group meetings and the annual NYSCP DSL Conference.

All Lower Sixth Form pupils receive safeguarding training prior to taking up duties in House and around School.

2.9   Annual Review

The DSLs, with the Governor responsible for Safeguarding, undertake an annual review (as a minimum) of the Safeguarding Policy. The policy is agreed by the Governing Body after detailed scrutiny and recommendation for adoption by the Boarding, Wellbeing and Safeguarding sub-committee, annually. An annual Safeguarding Report is presented to the Governing Body by the Deputy Head to enable it to scrutinise the effectiveness of the reviewed policy and implementation of the procedures. Safeguarding Report updates are issued in the other two terms.

The DSL communicates regularly with the nominated Governor for safeguarding by way of an email updating on any key safeguarding or child protection issues.

The School also uses the NYSCP School Safeguarding Audit Tool each year – this is approved by the Governing Body before its submission no later than 31 March.

3 IDENTIFYING CHILDREN SUFFERING OR LIKELY TO SUFFER SIGNIFICANT HARM

It is the responsibility of all staff to report concerns. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members have any concerns, they should always speak to the DSL as soon as possible.

Staff must monitor and, through the DSL, review any cause for concern about a child's welfare.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately.

Possible signs that may indicate a cause for a serious child welfare concern are:

- Injuries or marks without reasonable explanation
- Attendance patterns
- Statements, comments
- Stories, 'news', drawings
- Response to P.E./Sport/Music/Drama
- Changes to mood
- Changes to academic functioning
- Sexualised behaviour or language
- Significant weight loss or gain
- Relationships
- Language and Behaviour
- Demeanour and appearance
- Family circumstances
- Parental behaviour/care of children

Staff should be aware that behaviours linked to drug taking, alcohol abuse, and truanting put children in danger.

A child going missing from education is also a potential indicator of abuse or neglect.

Staff must be alert to pupil relationships and the potential for child-on-child abuse, this can include bullying, cyberbullying, gender-based violence, sexual assaults and sexting.

3.1 What is Abuse?

Abuse is a form of maltreatment of a child (physical, sexual, emotional or neglect). Somebody may abuse a child by inflicting or by failing to prevent harm. They may be abused by other children (child-on-child abuse) or adults, 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 may take place wholly online or technology may be used to facilitate abuse offline.

The effects of abuse can be permanent, or last well into adulthood. An abused child can become an adult who is unable to enjoy satisfying relationships with other people; he or she may well experience psychological problems or be prone to self-abuse or the abuse of other vulnerable people.

Abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label, in most cases multiple issues will overlap with one another.

All staff should be aware that Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of child abuse.

Annex B of KCSIE (2022) gives detail on specific forms of abuse and safeguarding issues. Staff who work directly with children are asked to read this annex at the start of each academic year and to acknowledge they have done so. Appendix D of this policy details key signs of specific types of abuse.

3.2   Wider Safeguarding Duties

3.21   Honour-Based Abuse

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.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or deputy) without delay. As appropriate, local safeguarding procedures will then be activated, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

3.22   FGM

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society.
- Mother or a sister who has undergone FGM.
- Girls who are withdrawn from PSHE.
- Visiting female elder from the country of origin.
- Being taken on a long holiday to the country of origin.
- Talk about a 'special' procedure to become a woman.

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.

- Talking about pain or discomfort between her legs.

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 may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, 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.

Staff **must personally report** to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is a good reason not to, staff should still consider and discuss any such case with the DSL (or deputy) 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 member of staff 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, staff should consult the DSL or Deputy and follow local safeguarding procedures.

3.3   Forced Marriage[4]

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).

Staff concerned that a pupil may be involved in a forced marriage either through disclosure or suspicion should consult the DSL or Deputy without delay – they will then follow local NYSCP procedures.

3.4   Radicalisation and Prevent Duty

The Prevent Duty Guidance for England and Wales (2015, revised 2021)[5] gives all School staff an obligation under the Prevent Duty to be aware of the ways in which extremist groups attempt to influence and radicalise young people and report any concerns to the Safeguarding Team. To ensure they are able to do this effectively, staff receive training in the Prevent Duty as part of their regular safeguarding training and are asked to complete further online training produced by the Home Office.

As with other safeguarding risks, all 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

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[4] The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force on 27 February 2023. It means that 16- and 17-year-olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent.

Previously, forced marriage was only an offence if the person uses a type of coercion, for example threats, to cause someone to marry. It is now an offence to cause a child under the age of 18 to enter a marriage in any circumstances, without the need to prove that a form of coercion was used. This includes non-legally binding 'traditional' ceremonies which would still be viewed as marriages by the parties and their families.

[5] Paragraphs 57-76 are particularly relevant and contains information which is specifically concerned with schools.

proportionately which may include the DSL (or a Deputy) making a Prevent referral. In North Yorkshire, Prevent concerns can be reported directly to the Police or via the NYSCP Customer Resolution Centre for referrals.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. 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 or the internet) and settings (such as within the home).

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes.
- Glorifying violence, especially to other faiths or cultures.
- Making remarks or comments about being at extremist events or rallies outside school.
- Evidence of possessing illegal or extremist literature.
- Advocating messages similar to illegal organisations or other extremist groups.
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent).
- Secretive behaviour.
- Online searches or sharing extremist messages or social profiles.
- Intolerance of difference, including faith, culture, gender, race or sexuality.
- Graffiti, art work or writing that displays extremist themes.
- Attempts to impose extremist views or practices on others.
- Verbalising anti-Western or anti-British views.
- Advocating violence towards others.

4   ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ABUSE (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

All staff should be aware that children can abuse other children (referred to as child-on-child abuse), and that it can happen both inside and outside of school or online. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. All staff should be clear as to the School's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them, and in the worst case scenario, creates a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Staff must be particularly alert to safeguarding pupils against the risk of child-on-child abuse in the boarding environment. Children may be particularly vulnerable in residential settings. There are additional requirements for boarding schools that are set out in the National Minimum Standards for Boarding Schools which can be found here. The School pays particular heed to Part G of those standards (Promoting positive behaviour and relationships). All staff should understand that just because there are no reports of child-on-child abuse within a particular House, tutor group or year group, that it does not mean it is not happening, it may simply mean that it is not being reported, therefore it is vital that staff report any concerns relating to child-on-child abuse to the DSL or one of the DDSLs immediately.

The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

Child-on-child abuse 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 children (sometimes known as 'teenage relationship abuse')
- **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 nude 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[6]
- **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).

4.1   Steps Taken to Address Child-on-Child Abuse

The School takes following steps to minimise or prevent the risk of child-on-child abuse:

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- Our pastoral curriculum and PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities. The School attempts to foster healthy and respectful relationships between pupils, and between pupils and pupils at other schools – both male and female.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school.
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.

The School's Relationships and Sex Education Policy (RSE) outlines our approach to help prevent child-on-child abuse. We believe that high quality, comprehensive RSE does not encourage early sexual experimentation but in fact builds young people's confidence and self-esteem and helps them understand the reasons for delaying sexual activity. Evidence shows that effective RSE plays a role in behaviour change, including reducing unprotected or unwanted sex and reducing harmful behaviour, including sexual harassment and sexual violence. Our RSE programme is an integral part of our whole school Pastoral Curriculum embedded within the school's framework for PHSE and the Science curriculum.

4.2   What to do in the event of an allegation against a pupil or pupils

The School's response to incidents of child-on-child abuse will be guided by its Anti-Bullying and Behaviour, Reward and Sanctions Policies and may, where appropriate, also involve a referral to other agencies such as the police or Social Services.

Victims of child-on-child abuse should be supported as they would be if they were the victim of any other form of abuse, in accordance with this policy. If the threshold does not reach the level to constitute a safeguarding investigation, perpetrators will be dealt with in accordance with the School's Behaviour and Exclusion Policy.

All allegations of child-on-child abuse should be passed to the DSL immediately. They will then be investigated and dealt with as follows:

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[6] The School will continue to monitor developments closely with regards the recent Law Commission recommendations associated with the taking of intimate images and acts such as 'downblousing' (the act of taking photos down a woman's top without consent).

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Where allegations of sexual violence or sexual harassment are made, the School will act in accordance with the guidance set out in Part 5 of *Keeping Children Safe in Education (2022)*.

A bullying incident will be addressed as a child protection concern when there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. All children involved, whether perpetrator or victim, should be treated as being at risk.

In cases of sharing nudes or semi-nudes we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS) 'Sharing Nudes and Semi-nudes: advice for education settings working with children and young people' 2020.

The same procedures as for an allegation against a member of staff (or volunteer) will be followed. A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the school's policy on behaviour, discipline and sanctions will apply.

The school will immediately take advice from the Emergency Duty team at Children's Social Care and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of Children's Social Care, parents are informed as soon as possible and that the pupil is supported during any interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation.

4.3   Thresholds for Referral

Using the Brook Traffic Light Tool to help gauge behaviours is essential and good practice. The age of pupils is important as that can determine whether they are able to give consent (if sexual activity is involved) or if there is a significant age gap between pupils involved (either as perpetrators/victims), this can mean there are issues of power/coercion at play.

NYSCP look for the following key indicators when handling any case:

- Size of the age gap between pupils involved.
- If the actions taken by the perpetrator are causing significant amounts of distress.
- Is there a lack of consent in any relationship between those involved?
- Is there an issue of power imbalance in interactions or an element of coercion in the perpetrator's actions?
- Is behaviour threatening?

Elements of behaviour which match any of these points would place them above a threshold for referral.

4.3.1 Using the Brook Traffic Light Tool

Terms and types of behaviour identified in the Traffic Light Tool are subjective and will need to be contextualised to the pupils involved.

Amber-type behaviours on their own may not be sufficient to pass a threshold for referral; if there are multiple behaviours identified then this would, most likely, be directed to a referral for Early Help, albeit the individual situation and family situation would need to be considered.

Red-type behaviours would likely point towards a referral – and this would likely be related to serious safeguarding concerns.

The School will always take advice from children's social services on when and how to inform the pupil about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all pupils involved including those accused of abuse.

5   CONCERNS ABOUT A CHILD

5.1   What Staff Should do if they have Concerns About a Child

If staff are told of any incident or have a strong suspicion of physical, emotional or sexual child abuse or neglect (including attempts to radicalise or coerce individuals to hold extreme political or religious views) occurring in the school, outside the school linked to members of school staff and their families or to a pupil of the school at home or outside the school, they must report this immediately to the DSL. In the absence of the DSL, the immediate report should be made to one of the Deputy DSLs.

If the allegation concerns a member of staff the matter must be reported immediately to the Headmaster (or to the DSL/Deputy Head if the Headmaster is unavailable). If the allegation or suspicion is about the Headmaster, the report should be made to the Chair of Governors or directly to Children's Services without informing the Headmaster.

Staff must report any abuse of a pupil that they become aware of (or suspect) including any abuse that occurs online. This may include possible abuse of a pupil by a staff member or another adult, abuse at home or perpetrated by their family members, abuse by a stranger, and abuse of a pupil/pupils by another pupil or group of pupils.

School staff (including the DSL, and the Headmaster) must not investigate reports of abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by school staff beyond the point at which it is clear that there is an allegation of abuse.

If a child makes a disclosure relating to physical, sexual, emotional abuse or neglect the following procedures must be followed – **these are the 'Six R's'**. Staff should record in writing all concerns, discussions and decisions (together with reasons) made under these procedures. Staff may use the Disclosure Form (Appendix A) for this purpose if they wish. This record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. The record should be signed by the person writing it.

Staff in the Junior School or Mill House should always use the specific forms provided to record concerns or make notes. This includes a body map if required.

Staff should not assume another colleague or professional will take action. Safeguarding is everyone's responsibility. If a member of staff is worried about a pupil or has any suspicions, however small, they should talk to a member of the Safeguarding Team immediately. It is *not* the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation.

All concerns regarding the welfare of pupils should be clearly recorded and discussed with the Designated Safeguarding Lead (DSL) or a Deputy DSL prior to any discussion with parents. Whilst there is no requirement for parental consent for referrals to statutory agencies, the School will always look to involve parents unless there is a reason to think that doing so will place the child at risk of (further) harm. Staff must always act in the interests of the child.

READY

- A pupil may wish to talk to you at any point - if this involves safeguarding you must be prepared to listen immediately.
- Do not ask the pupil to come back later or to make an appointment.

RECEIVE

- The pupil has chosen you - you are in a position of trust.
- Listen carefully to what they say.
- Do not show shock or disbelief.
- Take it seriously.

REASSURE

- Tell the pupil that they have done the right thing by speaking out.
- **Do not promise confidentiality** - you have a duty to refer. You can, however, state that information will only be shared with the people who need to know.
- Alleviate guilt - the pupil is not to blame and they did the right thing in coming to you.

RESPOND

- **Do not ask leading questions** (eg 'did X do this to you?') or interrogate them.
- Do not criticise the alleged perpetrator.
- Do not ask the pupil to repeat the matter to another member of staff. Explain that you need to talk to the DSL.
- **Do not investigate the matter yourself**.

RECORD

- Make brief notes if you can during the meeting, or if not, immediately afterwards.
- Keep your original notes.
- Record the date, time, place and the actual words used by the pupil.
- Record statements and actions rather than your interpretation.

REPORT

- Immediately contact the school DSL or the Headmaster as appropriate.
- You can use the reporting form attached in Appendix A as the DSL may have to make your record available to Children's Services.

5.2   What concerns must you immediately report?

- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Any behaviours which give rise to suspicions that a child may have suffered harm (e.g. significant changes in behaviour, worrying drawings or play).
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Any concerns that a child is presenting signs or symptoms of abuse or neglect.
- Any significant changes in a child's presentation, including non-attendance.
- Any hint or disclosure of abuse or neglect received from the child, or from any other person, including disclosures of abuse or neglect perpetrated by adults outside of the family or by other children or young people.

- Any concerns regarding person(s) who may pose a risk to children (e.g. staff in school or person living in a household with children present) including inappropriate behaviour e.g. inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.
- Any concerns related to serious crime, including knife crime.
- Any concerns relating to child-on-child abuse.
- Any concerns relating to youth produced sexual imagery.
- Any concerns relating to a child's engagement with extremist groups or ideologies.

These concerns should not be discussed with other colleagues or friends or anyone other than a designated person.

Concerns about a pupil may fall into one or more of several categories, of which the most important are as follows:

Early Help[7]. Some pupils may benefit from early help, and you are expected to try to identify such pupils where possible. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, if you consider that a pupil may benefit from early help you should discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Royal Borough Children's Services referral thresholds. The DSL will liaise with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, this will be arranged by Children's Services who will allocate an Early Help worker to the child and may intervene using local processes including use of the 'Common Assessment Framework' (CAF) and 'Team Around the Child' (TAC) approaches.

A **Child in Need** refers to a pupil whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential. These pupils will be referred to Children's Services and will benefit from additional support which should be put in place as soon as a problem is identified. The school or the Royal Borough's Children's Services team may also refer to external agencies for further advice and support.

A **Child at Risk** is a pupil who is at risk of significant harm (which may or may not be abuse). Such cases will be referred to Children's Services immediately in accordance with the procedures outlined in this policy. The Royal Borough Children's Services thresholds will determine the level of support the pupil requires.

5.3   What Staff should do if a Child is in Danger or at Risk of Harm

Any member of staff (including governors, supply, agency and volunteers) who believes that a pupil is in immediate danger or at risk of harm, should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of becoming aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. They should challenge any inaction and follow this up with the DSL and children's social care as appropriate.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

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[7] Paragraph 1.11 to this document further details which children are most likely to benefit from Early Help.

The school's Local Safeguarding Partners are North Yorkshire Safeguarding Children Partnership. Their specific procedures can be found here, including a downloadable copy of the Universal Referral Form. Full contact details can be found at the start of this policy.

Specific concerns about immediate harm may arise where pupils are engaged in close one-to-one teaching, for instance in games coaching, individual music lessons, drama or in one-to-one situations with tutors, or other school staff.

5.4   What Staff should do if a child is seen as at Risk of Radicalisation

Paragraph 3.4 to this policy details the Prevent Duty Guidance and signs to be alert to in pupil behaviour. **Staff should follow the School's normal referral processes** when there are concerns about children who may be at risk of being drawn into terrorism. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism, they must call 999.

The School recognises that some pupils may be in danger of being drawn into terrorism or other forms of extremism and carry out appropriate risk assessments. This may involve consultation with local partners, such as the police, about the potential risk in the local area. Such risk assessment is discussed with the Headmaster, the DSL, Deputy DSLs and the nominated governor for safeguarding to ensure our safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism. The Risk Assessment is regularly reviewed.

The School takes appropriate measures to ensure that visiting speakers are vetted and that they are always accompanied while on school premises. Pupils are encouraged to critically assess the information they receive and oversight ensures that the ideas disseminated are aligned with the values of the school and fundamental British values.

5.5   What Staff should do if they discover an act of Female Genital Mutilation

FGM involves cutting or injuring the female genital organs for non-medical reasons. It is a practice that is not condoned by any religion and can leave physical and mental scars on the girl involved. It is illegal in the UK but young girls can be sent abroad to have the procedure carried out.

Where any member of staff suspects a girl has been subjected to FGM or is at risk of being so, they should discuss their concerns with the Safeguarding Team. School staff must never undertake physical examinations of pupils.

Where a case of FGM of a girl aged under 18 is confirmed (either through direct disclosure from the victim or observation of physical signs which appear to show that an act of FGM has been carried out), teachers are under a personal mandatory duty to report this to the police, by calling 101 or (if there is a risk of immediate harm to the child) 999. This should be done as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day.

The Safeguarding Team must also be informed. Further information on reporting procedures is available from the Department for Education and Home Office.

5.6   What Staff should do if they have Concerns that Children are at risk from or involved with Serious Violent Crime

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, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to children's social care.

5.7 How should Staff respond to an Incident of Nudes and Semi-nudes being shared by Pupils

In responding to incidents of nudes and semi-nudes being shared by pupils, the School will act in accordance with guidance published by DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020).

Key points to note are:

- All incidents of youth produced sexual imagery (sometimes referred to as "YPSI") will be dealt with as safeguarding concerns and must be reported to the safeguarding team without delay, even if the imagery seems to have been produced consensually.
- If staff become concerned about a YPSI issue in relation to a device in the possession of a pupil (e.g. mobile phone, tablet, digital camera), the member of staff should confiscate the device and pass it immediately to the DSL. Staff must not ask to see, look at, print or forward any images.
- Staff should self-refer if they accidentally see any images.

After receiving a report of such an incident, the DSL will consider next steps. Before making a decision to view imagery, the DSL must be satisfied that this:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved);
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report;
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

In such cases, the DSL will gain authority from the Headmaster and Children's Social Services and will ensure viewing takes place with another senior member of staff present in the room (who does not need to view the images). Wherever possible, images will be viewed by a staff member of the same sex as the young person in the imagery. Viewing will be recorded in the pupil's safeguarding file, including details of who was present, why the image was viewed and any subsequent actions.

Young people who share sexual imagery of themselves or their peers are breaking the law. However, it is important to avoid criminalising young people unnecessarily. The School will, therefore, work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident. Current guidance suggests the following process should be followed:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keeping them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.

- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and this policy.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made to Social Services and / or the police. The police will always be informed if there is reason to believe that:

- the images involve sexual acts and a child in the images is under 13 years of age;
- there is adult involvement;
- there is criminal/abusive behaviour such as sexual abuse, extortion, threats, or sending/showing of images without the knowledge/against the will of a young person who is pictured.

If the School has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

All incidents relating to nudes and semi-nudes being shared will be recorded, whether they have been referred externally or not. If an incident is not reported externally, the reasons for doing so will be recorded. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

5.8   What Staff should do if a Child goes Missing from Education

A child going missing from education is a potential indicator of abuse. Attendance is registered in accordance with Department for Education requirements and staff are aware of how to deal with situations where pupils go missing either from school or on a school trip. Details of these procedures are outlined in the Missing Pupil Policy.

Paragraph 1.16 lays out the procedures for addressing children missing from education. The School has a thorough attendance monitoring policy and there are clear procedures in place to deal with instances of pupils going missing from school. Each member of staff is responsible for promptly registering any unexplained absences from their lesson, activity or registration period, and when it is established that a pupil cannot be accounted for the missing pupil procedure should be triggered without delay.

Attendance issues for boarders in a boarding environment are not generally an issue. However, if there are concerns that a pupil does not appear on time at the end of holidays without clear explanation from parents or guardians, or if there are concerns about the supervision of the child during the holidays, these concerns should be raised with the DSL.

5.9   What Staff should do if a Child requires Mental Health Support

Staff should consider 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 issue. However, staff are well placed to observe pupils day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a pupil that indicates they may be suffering, or at risk of suffering serious harm, they must contact the DSL or a Deputy immediately. For mental health concerns that do not meet the safeguarding threshold, the pupil can self-refer to the Wellbeing Centre, or their Housemaster/Mistress or another adult may make a referral on their behalf via the nursing staff.

5.10 Child Abduction

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); or by strangers. All staff should remain vigilant. Further information can be found at: www.actionagainstabduction.org.

5.11 What Staff should do if they have Concerns about Safeguarding Practices in the School

Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found on the School website here. 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. Malicious allegations may be considered as a disciplinary offence.

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

5.12 Pupils in Contact with the Police

Children are required to have an appropriate adult with them when in contact with police officers who suspect them of an offence.

The Police & Criminal Evidence Act 2019 (PACE) states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code. PACE further states that if an officer has reason to suspect that a person of any age may be vulnerable, then that person is also entitled to be accompanied by an appropriate adult.

The DSL will communicate any vulnerabilities known by the School to a police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS. If the DSL does not feel that an officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns. A person whom there are grounds to suspect of an offence must be cautioned before being questioned; before being asked further questions (should their initial answers provide the grounds for suspicion); and if it seems that their answers or silence may potentially be given in evidence to a court in a prosecution. A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

An 'appropriate adult' generally means, in the case of a child either the parent, guardian or a social worker. Failing these, some other responsible adult aged 18 or over who is not a police officer or in any way connected with a police force.

6 CONCERNS ABOUT A MEMBER OF STAFF

6.1 Child Protection Concerns

Members of staff concerned about the behaviour of a colleague towards a pupil or pupils may worry that they have misunderstood the situation or wonder whether a report could jeopardise a colleague's career. However, any concern about a member of staff must be raised immediately (see section 6.2) **regardless of how unlikely it seems that there would be any substance to the concern**. No further action may be necessary but it is important that such information is brought to the School's attention as soon as possible. In all situations **the welfare of the child is paramount**.

Staff against whom an allegation of abuse is made will be encouraged to seek personal support. The HR Manager can assist in making arrangements for this to be provided.

6.1.1 Reporting Procedures

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 (Part Four of KCSIE 2022) and Local NYSCP 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 below (and detailed in the separate Low Level Concerns Policy).

When staff report a concern of this nature they can expect:

- the concern to be taken seriously;
- their identity to remain confidential (if this is their wish), unless they are later required to act as a witness in court proceedings;
- to be protected as far as possible from victimisation or harassment;
- for an initial inquiry to take place to identify any action necessary;
- Children's Services and the Police to be involved if the concern relates to abuse or neglect or the potential commission of a crime;
- written confirmation within the timescales given in the whistle-blowing procedures that their concern has been received and is being dealt with; and
- to be informed of the final outcome where possible, subject to the constraints of confidentiality and legal advice (please note, if restrictions are in place, or if we have received specific direction from the LADO or the Police, communication with the reporting party might not be permissible).

In cases where a member of staff living in one of the boarding houses is suspended from work following a child protection allegation, the School will make alternative arrangements for accommodation away from pupils.

Under the Boarding Schools Association's 'Commitment to Care' Charter, BSA will be notified of any allegation against a member of staff, whether recent or non-recent, which the school has referred to the LADO, to the police or to Children's Services. The report will be made as soon as it is permissible to do so and will include an outline of the allegation and external

agencies that have been involved. It will not include any information that might identify individuals involved.

6.1.2 Reporting Historical (Non-Recent) Allegations

NYSCP define non-recent abuse as where the reported abuse occurred over one year before it was disclosed and/or reported.

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.

6.2 How to Raise Concerns About an Adult

If there is a child protection concern about the behaviour of a colleague, or about a school practice, which is likely to put pupils at risk of abuse or other serious harm, staff must report it immediately, using one of the steps outlined below:

- **Allegations against staff, volunteers or contractors**: If staff are making an allegation or complaint against any member of staff (including the DSL or a DDSL), volunteer or contractor, they should report it immediately to the Headmaster (or to the Deputy Head if the Headmaster is unavailable). The Headmaster may, if appropriate, liaise with the DSL or Deputy DSLs about an allegation concerning a staff member.

- **Allegations against the Headmaster**: If staff are making an allegation against the Headmaster, they should report it to the Chair of Governors, or directly to Children's Services (contact details at the front of this policy) if the Chair of Governors is not available, without notifying the Headmaster.

- **Allegations against the Chair of Governors or other Governors**: If staff are making an allegation against the Chair of Governors or another Governor, they should report it to the Headmaster (or to the Deputy Head/DSL if the Headmaster is unavailable).

6.3 What Happens when an Allegation is Made?

The School will deal with any allegation of inappropriate behaviour that harms, or may cause harm to a pupil, as an immediate priority.

If an allegation is made against anyone working or volunteering at the School, we will not undertake our own investigation into the allegation without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. It is important that staff do not carry out their own investigations prior to informing the Headmaster or Chair of Governors for the same reason. In borderline cases the Headmaster and Chair of Governors are allowed to informally discuss the issue with the LADO on a 'no names' basis.

1. Concerns including allegations which appear to meet the reporting criteria are to be reported straight away to the 'case manager', who is the Headmaster, or to the DSL. If an allegation is reported to the DSL, the DSL will keep the Headmaster informed. Where the Headmaster or DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors.

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). All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. 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 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 of action.

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.

6. 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 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.

7. 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.

8. 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.

9. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from 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.

10. 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 subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

11. 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.

12. 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. 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).

13. 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. 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.

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.

6.4 How Individuals will be Treated if an Allegation is Raised against them

The school's Disciplinary Procedure may apply in the event of an allegation being made. Every effort will be made to maintain confidentiality and guard against unwanted publicity. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

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.

Where initial discussions lead to no further action, the case manager and the LADO will 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. 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. Records which contain information about allegations of sexual abuse will be retained for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse

("IICSA")). All other records will 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.

Allegations which are false, malicious, unfounded or unsubstantiated will not be included within the individual's future references.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will 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 Children's Services may be appropriate.

6.5 Reporting Low Level Concerns About Adults Working for or on behalf of the School

Concerns that do not meet the harm threshold are called low level concerns. Examples of these could be using inappropriate language with pupils, being over-friendly, showing favouritism, etc. Low level concerns should still be reported in order to encourage an open and transparent culture, enabling the school to identify concerning, problematic or inappropriate behaviour early, to minimise the risk of abuse, and to ensure that adults working in or on behalf of the School are clear about professional boundaries and how to act within those boundaries.

A growing body of research shows children are more likely to experience abuse in institutions where 'low-level' poor practice and boundary violations are tolerated. Reviews of institutions in which serious abuse has been discovered have further observed that indicators of what was happening were noticed by staff, but their significance was not realised, and they were not acted upon. Therefore, it is important that staff report all concerns that the Staff Code of Conduct has been breached, even where this may appear to be a relatively minor matter. Staff should be reassured that their reports will be treated confidentially and sensitively. In the great majority of cases, breaches of the Code of Conduct will be a matter of misjudgement rather than malign intent and words of advice or support from a senior manager and, where appropriate, accompanied by a letter of concern, explanation, or clarification will be the most appropriate response.

All low-level concern reports will be handled sensitively and proportionately with the primary aim to strengthen systems within the School's safeguarding system and to support individuals to correct behaviour at an early stage.

All reported low level concerns will be recorded. The record will include details of the concern, the date of the concern, the context in which the concern arose and the action taken. The name of the individual sharing the concerns will also be noted (although if the reporter wishes to remain anonymous this will be respected as far as possible). All records will be kept confidential and stored securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records will be retained on staff files for ten years or until the individual has left employment, whichever is longer.

6.5.1 How to Report Low Level Concerns

Low level concerns can be reported via the School's safeguarding email, safeguarding@giggleswick.org.uk or staff can speak to (or email) the Headmaster directly. A low-level concerns form can be found within the School Staff Team on the Safeguarding channel. Should members of staff wish to consult the DSL, they may do so; the DSL will pass on any information in the most timely manner to the Headmaster. Any concerns raised will be treated with the utmost sensitivity.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Headmaster or DSL, on his behalf, will consult with the Harrogate and Craven LADO Team and take a more collaborate decision-making approach. The Headmaster is the ultimate decision-maker in respect of all low-level concerns.

Where a low-level concern is raised about the Headmaster, it should be referred to the Chair of Governors.

6.5.2 How to Self-Refer a Low Level Concern

Staff are encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

6.5.3 Monitoring Low Level Concerns for Patterns of Behaviour

The School will reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate a unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will the follow the above procedure and refer the matter to the LADO.

6.5.4 Low Level Concerns about Supply Staff or Contractors

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

7 RECORDS, MONITORING AND TRANSFER

Well-kept records are essential to good child protection practice. All safeguarding concerns and discussions, along with decisions and the reasons for them, must be recorded in writing. All staff must be clear about the need to record and report concerns about a child. If in doubt, staff should discuss with the DSL.

Child protection records are reviewed regularly by the DSL and deputies to check whether any action or updating is needed. This includes monitoring patterns of complaints / concerns about any individual, and ensuring these are acted upon.

Records are retained by the school in line with guidelines issued under local multi-agency arrangements.

7.1 General advice

All concerns, discussions, decisions, agreements made, actions taken (dated, timed and signed to include the name and agency/title of the responsible person spoken with) and arrangements for monitoring/review should be recorded carefully and any written notes stored securely.

School will record:
- Child's full name, family address, DoB
- Emergency contacts
- Names of all household members and dates of birth especially for siblings & other children
- Those with parental responsibility, primary carers, names of persons authorised to collect from school, copies of any orders etc
- Key contacts in other agencies including GP details
- Details of significant contact with carers
- The plan to protect the child and arrangements for monitoring/review

ALL notes made should be kept. These should be:
- Original
- Contemporary
- Include names & details of others involved or present
- Signed and dated

All records should be OBJECTIVE and include:
- Statements, facts and observable things (what was seen/heard)
- Diagram indicating position, size and colour of any injuries (not photograph) if appropriate
- Words child uses (not translated into 'proper' words)
- Notes of non-verbal behaviours

7.2 Keeping Information

All Child Protection documents will be stored in CPOMS.

The School keeps any paper records in the secure on-site archive or in a secure location off-site, and digital records under conditions of equivalent security. Safeguarding files are stored separately from other pupil or staff records. Access is restricted to specific staff with a need to see them, such as the DSL, Deputy DSLs and Headmaster, counselling and medical staff. This access may also be extended to the Chair of Governors, if necessary. Boarding staff who are in loco parentis or directly responsible for supervision of the pupil may be given access to individual files of pupils for whom they are caring, if this is judged necessary to ensure the safety and welfare of the pupil.

7.3 Transfer of Records

When a pupil transfers to another school, their Child Protection Record is forwarded to the new school without delay (and within 5 days for an in-year transfer or within the first 5 days of the start of a new term). If the pupil is the subject of a Child Protection Plan, the child's social worker is informed.

For pupils transferring into the School, the Admissions Manager will send an email to the 'sending' school asking the DSL to confirm, via a Microsoft Form, whether there are any safeguarding and child protection records to transfer and, if there are, that they are sent to the DSL at the School. This applies to all pupils in the Junior and Senior Schools.

Safeguarding records sent by the School to 'receiving' schools (i.e. pupils leaving Giggleswick) will be transferred separately from other records, using a secure method – this is most often digitally via a CPOMS transfer or encrypted/passworded file transfer but could be hand or recorded postal delivery. Wherever possible, records will be transferred directly to the named individual responsible for safeguarding at the receiving school and an acknowledgement of receipt obtained. A copy will be kept at school until safe receipt is confirmed. Files requested by other agencies (e.g. police) will also be copied.

If the child goes missing from education or is removed from roll to be educated at home then any Child Protection file should be copied and the copy sent to the Safeguarding Unit Manager, County Hall, Northallerton, DL7 8AE.

Original copies with a record of when and to which establishment a copy has been sent will be retained in accordance with current guidance, for example from IICSA, usually until at least the child's 25th birthday.

7.4 Information Sharing

Information sharing is vital in identifying and tackling abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. Staff should 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 have needs. Data protection legislation is not a barrier to sharing information, and concerns for confidentiality and fears about sharing information should not be allowed to stand in the way of the need to promote the welfare of children.

The General Data Protection Regulation (GDPR) and Data Protection Act (2018) applies to safeguarding records as much as any other personal data that the school may hold. It places duties on the School and the individuals it employs to process personal information in a fair, lawful and transparent manner. Safeguarding information should only be collected where there is a legitimate reason to do so (in this case, the protection of pupils from harm) and used only for that purpose. Records should be kept as accurate and up-to-date as possible, and retained only for as long as there is a justifiable reason to do so.

In general, data should only be processed with the consent of the individual it concerns. However, it may be lawful to do so without consent where this is necessary to protect an individual from neglect, physical, mental or emotional harm; or to protect the physical, mental or emotional well-being of an individual. Safeguarding records can, therefore, be maintained even without an individual's consent being obtained.

The School works on the general principle that individuals have a right to see records relating to them. If pupils request access to their own safeguarding file, correction or deletion of any information which they contain, the DSL will take this general right of access into account when deciding whether to release the file. However, this general right of access may be restricted if, in the judgement of the DSL, release of the file may put the pupil or any other

individual at risk of harm. In some cases, it may be appropriate to release the file in an edited or redacted format. Where parents request access to their children's safeguarding records, the DSL will further take into account the age of the pupil concerned and the fact that the data strictly belongs to the child and not the parent.

The School may share information with external professional agencies (e.g. police, medical or social workers) when it is in the best interests of the child to do so.

Further guidance may be found in Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018).

If a member of staff is contacted by an external agency making enquiries about a child's welfare, please take their details and refer them to the relevant Designated Safeguarding Lead. Information should not be disclosed without verifying the identity of the caller and their role within that organisation.

The Governing Body will determine the level of information shared with volunteers and contractors.

7.5   Pupil Contact Details

Where reasonably possible, the School is expected to hold more than one emergency contact number for each pupil. This goes beyond the legal minimum. Each term, the School analyses its iSAMS database for each pupil to ensure that at least two contact numbers are held on record.

APPENDIX A   DISCLOSURE FORM

Recording Form for Safeguarding Disclosures

Can be completed by a member of staff if they wish, to record a disclosure made to them by a pupil.

Remember:

- ask "open" questions and not leading questions, that is, a question which suggests its own answer
- listen carefully and keep an open mind
- do not take a decision as to whether or not the alleged abuse or neglect has taken place.

Staff, volunteers and regular visitors are required to complete this form and pass it to Christian San Jose (DSL Senior School) or James Mundell (DSL Junior School) or in their absence one of their deputies.

Remember to download and save a copy of this form first.

Then, please email to **safeguarding@giggleswick.org.uk** or print and fill in by hand.

Do not let this form delay notification – please keep informing the DSL as soon as possible after a concern arises or a disclosure is received.

Please type or complete in black pen	
Date	
Time	
Place	
Member of staff present and position	
Full name(s) of pupil	
Ask the child to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach to the form.	

A non-exhaustive list of the details to be included:
- what was said or done, by whom, to whom and in whose presence
- when the incident took place and where
- whether the child wishes their parents [or legal guardian] to be informed.

Any additional comments or evidence

Details may include, for example, any concerns you may have about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of School.

Please also include a note of any other evidence, for example, written notes, items of clothing or mobile phone messages relating to the matter.

[Ensure that if there is an injury this is recorded (size and shape) and a body map is completed]

Signed by	
Print name	
Date of completion	

Body Map

Young Child
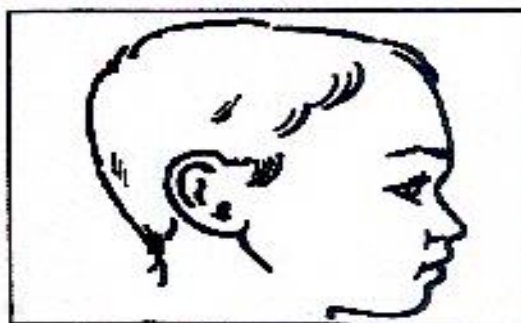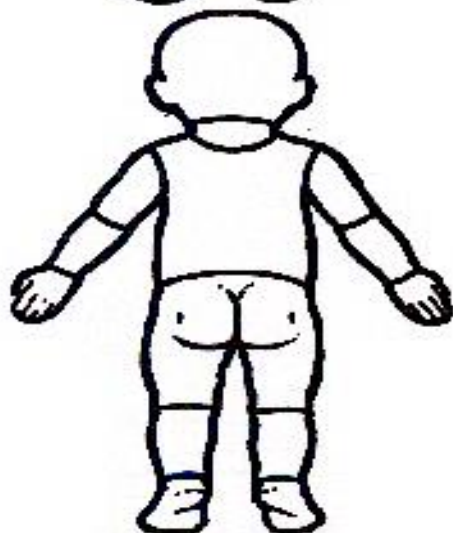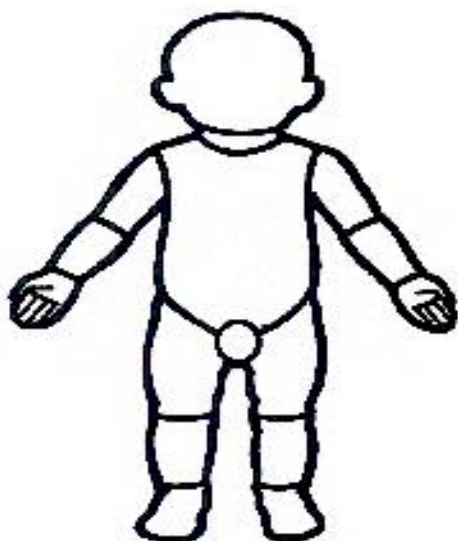
Indicate clearly where the injury was seen and attach this to the referral form

Body Map

Older Child

Indicate clearly where the injury was seen and attach this to the referral form

APPENDIX B   ROLE AND RESPONSIBILITIES OF THE DSL AND DEPUTIES

The DSL role is set out in full in KCSIE 2022 Annex C. The DSL role is explicit in their job description. The role carries a significant level of responsibility and the Governing Body have ensured that they are a senior member of staff on the School's leadership team and that they take lead responsibility for safeguarding and child protection (including online safety).

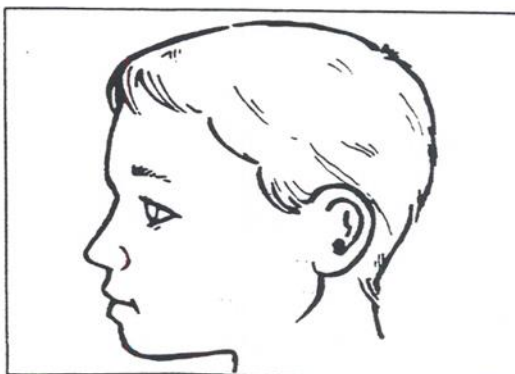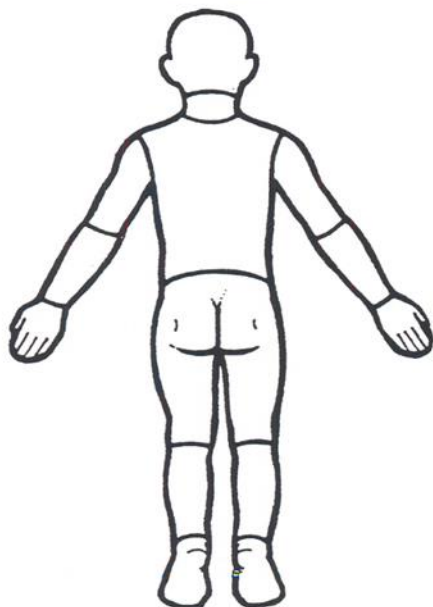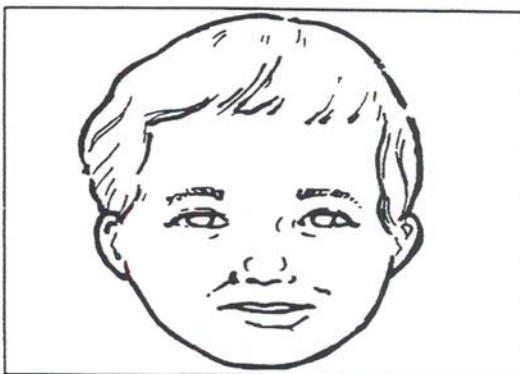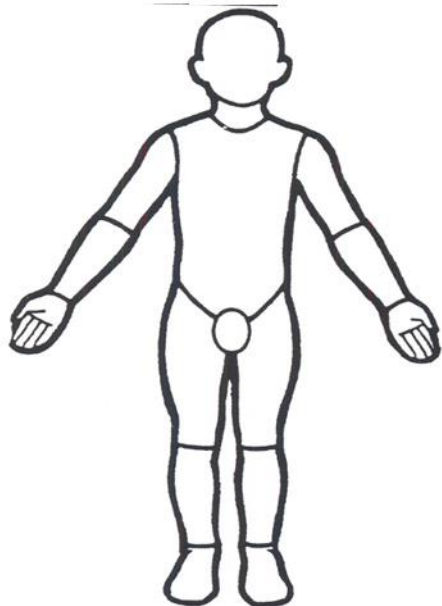The DSL has the appropriate status and authority within the school to carry out their duties. The DSL is given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

The DSL will encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School puts into place to protect them. They will be the first point of contact for parents, pupils, teaching & non-teaching staff and external agencies in all safeguarding matters.

They will act as a source of support, advice and expertise to staff on matters of safety and safeguarding, including leading on online safety. They understand the assessment process and use the NYSCP's threshold document (vulnerability checklist) to help identify the additional needs of children who would benefit from a co-ordinated offer of early help.

During term time the DSL (or a deputy) will be available in the School, usually in person, during school hours for staff to discuss safeguarding concerns. Out of hours cover may be by telephone and during holiday activities, separate arrangements are made to provide safeguarding cover.

The DSL and Deputies will:

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

- **Work with others to:**
    - Act as a source of support, advice and expertise for all staff;
    - Act as a point of contact with the safeguarding partners. The DSL and our Deputies will liaise with safeguarding partners and work with other agencies in line with Working Together to Safeguard Children (2018);
    - Liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under Section 47 (S47) of the Children Act 1989 and police investigations; and they will be aware of the requirement for children to have an Appropriate Adult PACE Code C 2019.
    - Liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member when required;
    - Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for disability (SEND) in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when

deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;

- o Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- o Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- o Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college . This includes:
  - ▪ Ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - ▪ Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

- **Share information and manage the child protection file**
  - o The DSL is responsible for ensuring that child protection files are kept up to date. Information is be kept confidential and stored securely. Concerns and referrals are kept in a separate child protection file for each child.
  - o Records are in line with Annex C of KCSIE and include:
    - ▪ A clear and comprehensive summary of the concern;
    - ▪ Details of how the concern was followed up and resolved;
    - ▪ A note of any action taken, including the timeframe for the follow up actions and who carried out these actions, the decisions reached and the outcome.
  - o They will ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this is in line with information sharing advice as set out in Part one and Part two of KCSIE;
  - o Where children leave the school, the DSL will ensure the child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. DSL will also ensure secure transit, and confirmation of receipt should be obtained. This will be transferred separately from the main pupil file;
  - o In addition to the child protection file, the DSL will consider if it would be appropriate to share any information with the new school or college in advance of a child leaving; and
  - o The DSL understands the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR

- **Raise Awareness by:**
  - o Ensuring each member of staff has access to, and understands the school's child protection policy and procedures, especially new and part time staff;
  - o Ensuring the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors and staff regarding this;
  - o Ensuring the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;

- o Linking with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding arrangements; and
- o Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children who have or have had a social worker, are experiencing with teachers and school and college leadership staff.

- **Ensure that they and our Deputies have the training, knowledge and skills to carry out the role**
    - o The DSL and their deputies will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The DSL will undertake Prevent awareness training. Our Deputy DSL(s) is trained to the same standard as the DSL. The ultimate lead responsibility of the role however, will remain with the DSL and will not be delegated.
    - o Training will provide them with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children as well as specific harms that can put children at risk, and the processes, procedures, and responsibilities of other agencies, particularly children's social care, so they:
        - Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
        - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and are able to attend and contribute to these effectively when required to do so;
        - Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
        - Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
        - are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
        - Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
        - Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation; and
        - Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
    - o They will refresh their knowledge and skills by (adapt to reflect your approach to ensuring that DSL and their deputies are updated routinely - this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments and news such as those provided by the NYSCP (https://www.safeguardingchildren.co.uk/professionals/nyscp-e-bulletin/) and NSPCC) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

- **Provide Support to Staff**

- o The DSL and our Deputies will always be available during school hours for staff to discuss any safeguarding concerns. The headteacher will arrange adequate and appropriate cover for out of hour's activities;
- o The DSL and our Deputies will ensure that staff are supported during the referrals processes; and
- o The DSL and our Deputies will support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

- **Understand the views of children**
  - o The DSL and our Deputies encourage a culture of listening to children and taking account of their wishes and feelings, among all staff and in any measures the school or college may put in place to protect them; and
  - o The DSL and our Deputies understand the difficulty children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication, for example, where children may not feel ready or know how to tell someone they are being abused, exploited or neglected and / or where they may not recognise their experiences as harmful

APPENDIX C   ROLE AND RESPONSIBILITIES OF THE GOVERNING BODY

The Governing Body have a strategic leadership responsibility for safeguarding and will comply with their duties under the legislation and guidance. They will facilitate a whole school approach to safeguarding and ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development and that all systems, processes and policies operate with the best interests of the child at their heart.

It is responsible for all aspects of the implementation, maintenance and review of this policy and will ensure that staff will receive appropriate levels of training and support to undertake their roles as outlined in this policy and that a log of their training is maintained. They will ensure that all safeguarding related policies and procedures are transparent, clear and easy to understand for staff, visitors, pupils, parents and carers.

The Governing Body ensures that all governors receive appropriate safeguarding and child protection training (including online) at induction that equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated, and a log of governor training is maintained.

The Governing Body ensures that:

- There are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;
- There is are effective child wellbeing and safeguarding policies in place including: this safeguarding policy (including procedures with regards to child on child abuse), a Behaviour policy, Early years foundation stage (EYFS) policy, Special educational needs and disability, Supporting pupils with medical conditions policy, a staff behaviour policy/code of conduct, Safeguarding response to children who go missing from education policy, Whistleblowing policy, Safer recruitment policy, Online safety policy, Low-level concerns policy, and an Educational visits policy;
- These policies, along with Part One and Annex B of KCSIE, and information on the role and identify of the DSL is provided to all staff on induction, including volunteers;
- Child Protection Files are maintained in line with Annex C of KCSIE;
- Appropriate Safer Recruitment Policies are in place in accordance with Part Three of KCSIE and are embedded and effective;
- The School holds more than one emergency contact number for each pupil (where reasonably possible);
- This policy reflects the whole school approach to child-on-child abuse, including child-on-child sexual violence and sexual harassment, whether or not this has been reported;
- The child protection procedures are in accordance with government guidance and refer to the North Yorkshire multi-agency safeguarding arrangements;
- These procedures reference online safety and special educational needs and disabilities discretely;
- These procedures reflect serious violence guidance;
- The School has appropriate safeguarding arrangements in place to respond to children who go missing from education, particularly on repeat occasions;
- Staff safeguarding training (including online safety) is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning; and
- This policy is reviewed annually (as a minimum) and updated if needed, and available publicly via the school website.

The Governing Body understands the obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty) specifically those outlined in KCSIE para 83-93 and summarised below.

- Under the Human Rights Act they understand that it is unlawful for schools and colleges to act in a way that is incompatible with the convention. The specific convention rights applying to schools and colleges are:
  o Article 3: the right to freedom from inhuman and degrading treatment (an absolute right);
  o Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity;
  o Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
  o Protocol 1, Article 2: protects the right to education.
- Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances Human Rights | Equality and Human Rights Commission
- Under the Equality Act they understand that:
  o they must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics);
  o they must carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race;
  o they can take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions Equality Act 2010: advice for schools.
- Under the Public Sector Equality Duty they understand that:
  o this places a general duty on schools and colleges to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not;
  o the duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism;
  o the schools or colleges must be conscious of disproportionate vulnerabilities and will integrate this into our safeguarding policies and procedures Technical Guidance on the Public Sector.

The Governing Body understands the obligations under the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR), and the duty to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Governing Body will ensure that relevant staff have due regard to relevant data protection principles to enable them share (and withhold) personal information, including:
- Being confident about the processing conditions for storing and sharing information for safeguarding purposes, including sensitive and personal information that should be treated as "special category personal data";
- Understanding that the "safeguarding of children and individuals at risk" is a processing condition that allows practitioners to share special category personal data. Information can be shared without consent where this is good reason to do so, to enhance the safeguarding of a child in a timely manner, if it is not possible to gain consents, or cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk of harm; it would be legitimate to share

information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk; and

- Not providing pupils' personal data where the serious harm test under the legislation is met, for example where the child is in a refuge or another form of emergency accommodation.

The Governing Body understand that it is essential that children are safeguarded from potentially harmful and inappropriate online material. The Governing Body will do all they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. The governing body will ensure the school has appropriate filters and monitoring systems in place.

APPENDIX D   ADDITIONAL INFORMATION ABOUT SPECIFIC FORMS OF ABUSE

D.1   Signs of 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 by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

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.

Signs:
• Bruising: especially to non-protruding parts of the body (head, ears, cheeks, mouth, chest, upper arms, stomach, thighs & buttocks). Includes black eyes (with soft tissue swelling), evidence of marks of objects used (belt, stick, fingers).
• Burns & Scalds: non-accidental burns normally have distinct outlines. Includes cigarette burns and some friction burns. Accidental burns should always raise questions about amount of supervision.
• Bites & Scratches: human bite marks are very noticeable as two semi-circles. Includes love bites (sign of sexual abuse). Deep and extensive scratches that could be inflicted by an adult. Bite marks are very significant.
• Lesions & Cuts: restraint of children using ropes or bands at wrist or ankle can lead to straight edged lesions.

NEGLECT is 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 involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs:
• Delayed physical and emotional development.
• Inadequate provision of diet, safe or clean hygienic living conditions. Severe infestations.
• Inadequate supervision e.g. child left to roam streets, alone in house, or with inappropriate carer.
• Failure to provide for children's medical needs.

EMOTIONAL ABUSE is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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.

Signs:

- Rejection shown by ridiculing, scapegoating and criticising.
- There may be no physical signs, but sleep problems, feeding problems, irritability, lethargy, excessive clinginess or poor attachments.
- Poor speech & language development, no stranger awareness, hyperactivity, poor social interaction, failure to acknowledge that others have rights.
- Poor self-esteem, poor concentration, wetting/soiling.
- Compulsive or disturbed behaviours, developmental impairment (physical & psychological), self-harm, suicide, depression, withdrawal, difficulty making friendships, being passive, apathetic.

SEXUAL ABUSE involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 (see below) which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. 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.

Signs:
- Sexually precocious behaviour
- Solvent, alcohol or drug abuse
- Eating disorders, self-harming
- Changes in school performance
- Isolation from peers
- Sexual abuse of other children
- Bruises, scratches, marks to neck, buttocks, breasts, lower abdomen or thighs
- Difficulty in walking or sitting
- Torn, stained or bloody underclothes

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

D.2   Specific Safeguarding Issues and Forms of Abuse

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); 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.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them claiming to be from a peer.
- Children and young people digitally manipulate an image of a young person into an existing nude online.
- Images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

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

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime 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 and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which 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 (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. 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.

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) who has been coerced into engaging in sexual activities. 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). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE 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.

The below 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, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

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 (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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. 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 below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. 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, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children 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.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of "deal line".

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

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

Modern Slavery: 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 National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*".

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 DSL (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. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk.

Mental health: all staff should 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 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 this policy, and speaking to the DSL {or DDSL}.

The DfE 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 and senior 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*. Its resources include social media, forming positive relationships, smoking and alcohol.

So called 'honour based' abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including 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.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

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. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in Section 8 of the *Multi-agency statutory guidance for dealing with forced marriage and Multi-*

agency practice guidelines: Handling cases of forced marriage (DfE, February 2023)[8]. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. 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 or the internet) and settings (such as within the home). 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 making a Prevent referral. Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Lesbian, gay, bi or trans ("LGBT"): The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

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.

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[8] https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible#national-support-agencies

https://www.gov.uk/government/news/legal-age-of-marriage-in-england-and-wales-rises-to-18

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.

School staff can contact Operation Compass on 0204 513 9990 for advice in respect of children who have experienced domestic abuse.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

APPENDIX E   CHARITY COMMISSION ACTIONS FOR TRUSTEES

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756636/10_safeguarding_actions_for_charity_trustees_infographic.pdf

10 actions trustee boards need to take to ensure good safeguarding governance

Safeguarding should be a key governance priority for all charities

Ensure your charity has an adequate safeguarding policy, code of conduct and any other safeguarding procedures. Regularly review and update the policy and procedures to ensure they are fit for purpose

Identify possible risks, including risks to your beneficiaries or to anyone else connected to your charity and any emerging risks on the horizon

Consider how to improve the safeguarding culture within your charity

Ensure that everyone involved with the charity knows how to recognise, respond to, report and record a safeguarding concern

Ensure people know how to raise a safeguarding concern

Regularly evaluate any safeguarding training provided, ensuring it is current and relevant

Review which posts within the charity can and must have a DBS check from the Disclosure and Barring Service

Have a risk assessment process in place for posts which do not qualify for a DBS check, but which still have contact with children or adults at risk

Periodically review your safeguarding policy and procedures, learning from any serious incident or 'near miss'

If you work overseas, find out what different checks and due diligence you need to carry out in different geographical areas of operation

**CHARITY COMMISSION**
FOR ENGLAND AND WALES

APPENDIX F   ACTIONS *AIDE MEMOIRE* WHERE THERE ARE CONCERNS ABOUT A CHILD OR COLLEAGUE

What to do if you have a safeguarding concern about a pupil	
1. Ensure the pupil is safe	• Assess if they are at immediate risk • Ask if they need someone to stay with them • Summon help from a colleague if necessary
2. Report your concern	**If the pupil is at immediate risk** • Contact a member of the Safeguarding Team in person or by phone. • In the unlikely event you cannot quickly contact the Safeguarding Team, you should take action to keep the pupil safe yourself (for example, contacting medical or mental health services, the police or Social Services). Please inform the Safeguarding Team what actions have been taken as soon as you can afterwards. **If there is no immediate risk** • Raise a report using the safeguarding email address and concerns form, giving details of your reasons for concern and any actions you have taken. • If you do not have access to a computer, contact the Safeguarding Team in person or by phone. They will ask you to record your concern in writing and tell you how to do this.
3. Follow Up	• A member of the Safeguarding Team should confirm that they have received your report and acted on it within 24 hours. Contact them again if you do not hear anything. • In the unlikely event you think the Safeguarding Team has failed to act to protect the pupil, you should consider making a direct referral to Social Services (or other appropriate agency) yourself.

What to do if you have a safeguarding concern about the conduct of a colleague	
1. Report your concern	• Contact the Headmaster, in person, by phone or by email. The Safeguarding Team and DSL will help you if you are worried about doing this. • If your concern is about the headmaster, contact the Chair of Governors. • If you feel that you may face a potential conflict of interest in reporting a concern directly to the Headmaster, you should contact the LADO directly yourself.
2. Follow Up	• In the unlikely event you think the School has failed to act on your report appropriately, you should share your concerns with the LADO at North Yorkshire Council. • If you have wider concerns about the School's response, you can contact the NSPCC Whistleblowing Advice Line.

In cases which also involve a concern or an allegation of abuse against a staff member, the relevant procedure must be followed (see Section 6 of this document)

Actions where there are concerns about a child
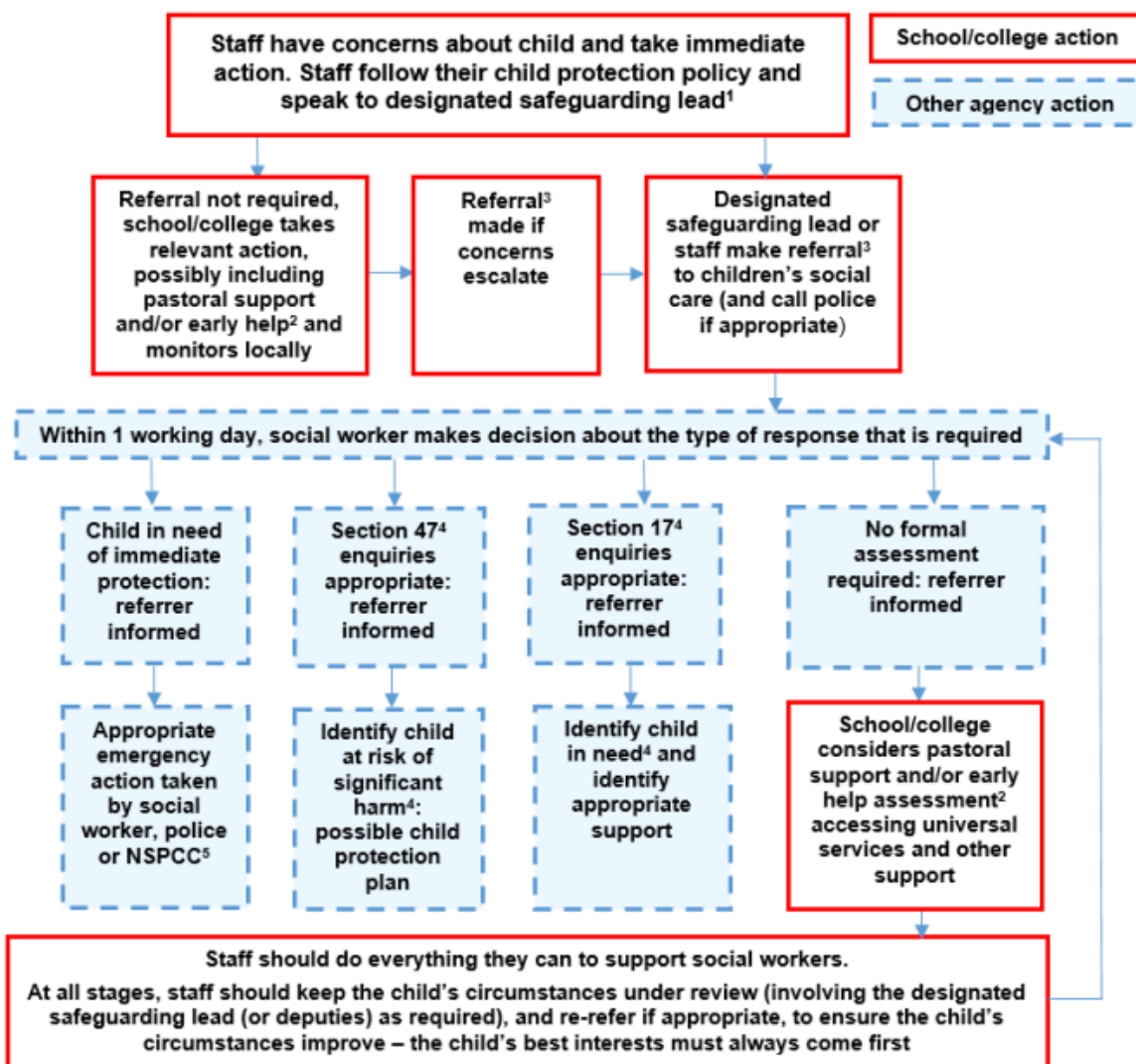
1. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged.
2. Referrals should follow the process set out in the local threshold document and local protocol for assessment.
3. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare.
4. This could include applying for an Emergency Protection Order (EPO).

APPENDIX G   RELATED DOCUMENTATION AND REFERENCES

This list covers some of the key documents and references on which the School's safeguarding is based, but is not exhaustive.

1. Legislation and External Guidance

- Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)
- Children Act (1989)
- Children Act (2004)
- Children Missing Education (DfE, September 2016)
- Counter Terrorism and Security Act (Section 26, 2015)
- Disqualification under the Childcare Act 2006 (DfE statutory guidance, August 2018)
- Education (Pupil Information) (England) Regulations (2005)
- Education Act 2002 (Section 175/157)
- Female Genital Mutilation Act (2003) (Section 74, Serious Crime Act, 2015)
- Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, 2019)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)
- KCSIE - *Keeping Children Safe in Education* (DfE statutory guidance, September 2022)
- Mental Health and Behaviour in Schools (DfE, 2018)
- Preventing and Tackling Bullying (DfE, July 2017).
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE, 2021)
- Revised Prevent duty guidance: for England and Wales (Home Office, April 2021)
- Searching, screening and confiscation at school (DfE, January 2018)
- Sexual Offences Act (2003)
- Sharing nudes and semi-nudes. Advice for education settings working with children and young people (UKCIS, 2020)
- Teaching online safety in school (DfE, June 2019)
- What to do if you're worried a child is being abused (DfE March 2015)
- When to call the police. Guidance for schools and colleges (NPCC, 2020)
- Working Together to Safeguard Children (HM Government, 2018 – updated 2022)
- https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19

2. School Policies and Guidelines

- Anti-Bullying Policy
- Attendance Policy
- Behaviour and Exclusion Policy
- PSHE Policy
- Educational Visits Policy
- Health & Safety Policy
- Low-Level Concerns Policy
- Missing Pupil Policy
- Online Safety Policy
- Relationships and Sex Education Policy
- Safer Recruitment Policy
- School Rules and Regulations
- Staff Code of Conduct
- Staff Handbook
- Taking, Storing and Using Images of Children Policy
- Visitors Policy (inc reference to Visiting Speakers)
- Whistleblowing Policy

APPENDIX H   SAFEGUARDING PUPILS IN PRIVATE STAFF ACCOMMODATION

The National Minimum Standards for Boarding (2022) make clear that pupils are only allowed to have access to residential accommodation in exceptional circumstances.

The standards also state in Part B, Boarding Provision: "Aim: The school provides a homely and welcoming environment…".

This appendix outlines the School's approach, stressing the welfare and safety of pupils at all times, and the need for all staff to adhere to clear professional guidelines in order to ensure both standards are met.

H.1 Residential Accommodation which is Contiguous to Boarders' Accommodation

Please read NMS 20 which refers to Accommodation which is Contiguous to Boarders' Accommodation and in particular NMS 20.10.

For the purpose of this policy, residential accommodation is defined as being those parts of the boarding house designated as solely for the use of the resident and/or the resident's family. In order to maintain continuity of effective pastoral care in the context of a boarding school, given the geography and design of the relevant buildings, it does not include areas clearly defined for communal use. These include areas such as house gardens, common rooms, snug rooms and kitchens within the houses.

The School prides itself on providing a family atmosphere in its boarding provision and it is a core element of the ethos of the school, the importance of which is emphasised in the National Minimum Standards Guidance, for pupils to benefit from engaging with adult company on a regular basis in an informal context.

It is essential that such activities are appropriately supervised and regulated in line with this safeguarding policy and the Staff Code of Conduct.

The following rules apply:

In line with Standard 20.10 of the NMS for Boarding Schools (2022), boarders should not have access to staff residential accommodation, other than in exceptional circumstances (this could be, for example, where a pupil is in distress or there is a need for privacy to break news to a pupil such as a bereavement of a close family member). Where this occurs, a one to-one situation should be avoided with boarders with another adult always present. Any such occasion should be reported as soon as reasonably possible to the DSL.

Guidance is given to SHS as to what the School defines as 'public-use spaces' within residential accommodation – gardens, kitchens, halls and cloakrooms, and sitting rooms – and these areas are noted below for each boarding house and private residence. In order to safeguard pupils when in these 'public-use spaces', such activities must satisfy the following criteria:

- They must always involve a group of pupils and never individuals.
- A member of staff must always be present and supervising throughout.
- If it is not the SHS supervising the occasion, they must have authorised it.
- The event - date, nature, staff supervising - must be logged – this is done via the Microsoft Form found on the SHS Team.
- School rules and guidance must be followed at all times.

The DSL will monitor the logs of such activity on a termly basis and look for patterns of behaviour. The aim of such monitoring will be to ensure:

- There is no pattern of inappropriate levels of engagement by any member of staff.
- There is no inappropriate favouritism shown towards individuals or groups.
- The reasons for such events are well documented and consistent between houses.

Staff and pupils are encouraged to pass on any low-level concerns they might have over such activities. This will assist the safeguarding team to monitor patterns of behaviour. Please see the Low-Level Concerns Policy and in particular the section on how to report a low-level concern and self-referral.

H.2 Residential Accommodation which is not Contiguous to Boarders' Accommodation

Please read NMS 19 which refers to accommodation which is not contiguous to boarders' accommodation and in particular NMS 19.2. Part A of this appendix applies to residential accommodation in each house, i.e. that residential accommodation which is contiguous to where the boarders live. The requirements of the National Minimum Standards relevant to other staff accommodation (particularly those living on campus) are covered in Standard 19.2 where the Disclosure and Barring Service (DBS) requirements are outlined.

Again, however, for the avoidance of doubt, it is vitally important that strict rules apply to visits by groups of pupils to houses occupied by staff.

- Visits to such houses can only be made by groups of pupils and by invitation. It must never be on an individual or ad hoc basis.
- The meeting must be for educational or pastoral purposes.
- It must be limited to the communal area designated in staff houses for such purposes.
- All such meetings must be approved in advance by the DSL.
- A member of staff must always be present and supervising throughout.
- School rules and guidance must be followed at all times.
- The meeting must be logged centrally. The DSL will monitor the logs of such activity on a termly basis and look for patterns of behaviour. The aim of such monitoring will be to ensure:
  - There is no pattern of inappropriate levels of engagement by any member of staff.
  - There is no inappropriate favouritism shown towards individuals or groups.
  - The reasons for such events are well documented and consistent between socials.
- Staff and pupils are encouraged to pass on any low-level concerns they might have over such activities. This will assist the safeguarding team to monitor patterns of behaviour. Please see the Low-Level Concerns Policy and in particular the section on how to report a low-level concern and self-referral.

Non-residential staff who have any pupils (including boarders) visiting their private homes off-site must remain aware of the need to safeguard the welfare of those pupils at all times. The only circumstances under which this should happen would be if the pupil were friends with the son/daughter of a member of staff and were visiting on a weekend. As with any other visit by boarders to friends' houses off-site, any such visit should be cleared with the pupil's SHS in advance and the pupil's parents/guardians.

H.3 Designated Public-Use Space in Residences

Residential Accommodation which is Contiguous to Boarders' Accommodation		
Boarding House	**Residence**	**Public-use space**
Carr	Music Cottages	Downstairs kitchen, study and sitting rooms. Gardens to front of residence.
Catteral	Housemistress' House	Downstairs kitchen and sitting rooms. Study is within the boarding house.
Morrison	Housemaster's House	First floor – kitchen and sitting room. Study area adjoining the boarding house. Gardens.
Nowell	Craven Bank South	Downstairs kitchen and sitting rooms. Garden and terrace.
Paley	Howsons	Downstairs kitchen and sitting rooms.
Shute	Craven Bank North	Downstairs kitchen and sitting rooms. Garden and terrace.
	Resident Tutor's House	Downstairs kitchen and sitting room. Garden.
Style	Beck House	Downstairs kitchen, sitting rooms and study. Gardens.
Residential Accommodation which is not Contiguous to Boarders' Accommodation		
Staff Role	**Residence**	**Public-use space**
Chaplain	Gatehouse	Dining room, sitting room. Private garden.
Headmaster	Holywell Toft	All downstairs rooms (kitchen, sitting room, dining room and study). Gardens.
Deputy Headmaster	Tems House	Downstairs rooms – kitchen, hall and sitting room. Garden.

APPENDIX I   POLICY CHANGES

Revision date	Page	Revision
1/1/22	1, 4, 41	Changes to names to reflect change of Headmaster and Safeguarding Team
31/8/22	Multiple	Annual review and update reflecting changes to KCSIE 2022
30/11/22	36-37	Addition of new sub section (4.3) to give further detail on thresholds for referral of sexualised behaviour and the use of the Brook Traffic Light Tool following a call to NYSCP children's' social services team.
4/12/22	53	Detail added in section 7.5 regarding policy on having two contact numbers for each pupil.
1/2/23	Appendix H	Updates to the wording around pupil access to staff residences.
28/2/23	32, 71	Updates to references and definitions on forced marriage following law change in England on 27 Feb 23. Addition of link to new statutory guidance (page 71).
3/3/23	52	Minor amendment to wording of transfer of safeguarding records – DSLs from sending schools are now requested to complete a Microsoft Form to confirm if there are safeguarding records to send.
17/4/23	Multiple	Amendments to contact details for North Yorkshire Referral line to reflect change to North Yorkshire Council on 1 April 2023. Change of name from North Yorkshire County Council to North Yorkshire Council where relevant.
2/5/23	44	Addition of Section 5.10 on Child Abduction.
2/5/23	4	Addition of line referring to IICSA findings in Policy Statement.
9/5/23	53	Addition of line relating to Governors and the level of information shared with volunteers and contractors.