

SAFEGUARDING SCHOOL- CHILD PROTECTION POLICY

This policy applies to the whole school including the Boarding House and is publicly available on the school website.

A copy may be obtained from the school Office.

Safeguarding is everyone's responsibility. It applies to all who work, volunteer, staff guests, learn, or supply services to our school. All staff including volunteers and visiting staff guests have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a child is at risk of significant harm or in need of support services. They are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead (DSL) the Headteacher or either of the deputies, Mrs Eileen Hussey (Assistant headteacher) and Mrs Alicea Anderson (Senior Teacher).

OUR CULTURE OF SAFEGUARDING AT STANBOROUGH SECONDARY SCHOOL

We approach safeguarding by making sure that everyone provides a safe environment in which children can learn. This includes, having a curriculum to promote safety and the correct documents, policies, procedures and records in place. Additionally, we believe that staff knowledge of the indicators of abuse and neglect is critical. Without these elements, safeguarding will be ineffective, just as it will if we fail to act on early signs of abuse and neglect in a professional way, do not share information, or do not listen to what children tell us. Even if children, young people and adults say they *feel* safe, we are fully aware that we must keep asking ourselves whether they *are* safe. The truth is that we do not know, which is why we take every step to develop a culture that is as safe as possible. We embed this culture by:

- *Recognising that anyone can become a perpetrator, regardless of faith, religion or background.*
- *Being aware of school related issues and trends, along with knowledge of concerns in the wider community.*
- *Being confident of reporting safeguarding (or potential safeguarding) concerns and respecting the importance of confidentiality.*
- *Never turning away from a difficult, controversial, embarrassing topic or conversation at our school.*
- *Discussing concerns sensibly, with maturity and consideration.*
- *Speaking to the right people to seeking advice and support.*
- *Acknowledging that safeguarding is everyone's responsibility and Working as a team to protect.*

Hertfordshire Safeguarding Children Partnership Procedures

Stanborough School is committed to safeguarding and promoting the welfare of our pupils and expects all staff including volunteers and visiting staff guests to share this commitment. It is our aim that all pupils fulfil their potential.

The school follows the procedures established by the Hertfordshire Safeguarding Children Partnership (HSCP); a guide to procedure and practice for all agencies in Hertfordshire working with children and their families. <http://hertsscb.proceduresonline.com/index.htm>

This policy, including its procedures, along with the related documents (which are listed at the end of this policy), is informed by statutory and best practice guidance being in accordance with locally agreed interagency procedures. Stanborough School recognises *it is an agent of referral and not of investigation. Any person may make a referral (including whistle blowing) to external agencies such as the Hertfordshire Safeguarding Children Board, Children's Social Care (CSC), the Multi Agency Safeguarding Hub (MASH) or the Local Authority Designated Officer (LADO) and the police, if necessary. Stanborough School allows access for children's social care from the host local authority and, where appropriate, from the local authority where the children reside, in undertaking their safeguarding (Child Protection) duties.*

Definition of Safeguarding from *Keeping Children Safe in Education (KCSIE)* (DfE: September 2023) This is defined as protecting children from maltreatment; preventing impairment of children's 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. Children includes everyone under the age of 18.

Monitoring and Review: This policy is subject to continuous monitoring, refinement and audit by the Head teacher and Designated Safeguarding Lead (DSL). The Governors will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. This policy will be reviewed no later than September 2023, or earlier if changes in legislation, regulatory requirements or best practice guidelines so require. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.

Date 3rd September 2023

Submitted to Board: 25 September 2023

Jeanetta H. Liburd	Pastor Eglan Brooks
Headteacher	Chair of Governors

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CONTACT DETAILS

Printed copies of the Hertfordshire Safeguarding Children Partnership (HSCP) procedures are available from the school office. HSCP can be contacted as follows:

- **Room 152, Postal Point CHO 116, County Hall, Hertford, Hertfordshire, SG13 8DQ**
- **Telephone: 01992 588757 Email: admin.hscb@hertfordshire.gov.uk**
- Outside of office hours and at weekends the emergency duty team can be contacted on: 03001234043
- **Website:** <https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/hscp.aspx>
- **For advice regarding child-on-child abuse incidents:** Child Protection Schools Liaison Officer (CPSLO):
Louise McCourts 07814 077877 E-mail: louise.mccourts@hertfordshire.gov.uk
- To report FGM: Herts Constabulary (Harm Reduction Unit): 0845 330022 or the police
- If you fear that a child is vulnerable to radicalisation, contact the PREVENT team at: prevent@herts.pnn.police.uk

Our School's Designated Safeguarding Lead (DSL) and the two Deputy DSLs have lead responsibility for child protection and are also the Prevent Officer and Deputy Prevent Officers responsible for the prevention of radicalisation, extremism and being drawn into terrorism. Their telephone numbers are prominently displayed in the school. The Stanborough School DSL and Deputy DSLs are:

Designated Safeguarding Lead (DSL), Prevent Officer and Head Teacher:

Mrs Jeanetta Liburd Telephone: 01923665970 / 0776819187 Email: jliburd@stanboroughpark.herts.sch.uk

Deputy Designated Safeguarding Lead (DSL), Deputy Prevent Officer and Senior Teacher for the whole school

In the absence of the DSL inform the Deputy DSL:

Mrs Alicea Anderson Telephone: 01923673268

Email: aanderson@stanboroughpark.herts.sch.uk

Mrs Eileen Hussey Telephone: 01923673268 Email: ehussey@stanboroughpark.herts.sch.uk

The Local Authority Designated Officer (LADO) is familiar with our methods and procedures, and good lines of communication are maintained. **It is:**

1. Andrea Garcia-Sangil. Contact details are: Telephone (office hours): 03001234040

E-mail: andrea.garcia-sangil@hertfordshire.gov.uk

Telephone (outside office hours): 5.00pm to 9.00pm and weekends: 03001234043

PREVENT – contact the PREVENT team at prevent@herts.pnn.police.uk for concerns relating to extremism and radicalisation.

The non-emergency police telephone number is: 101 and the Department for Education (DfE) dedicated telephone helpline and mailbox for non-emergency advice for staff and governors is: 020 7340 7264 and counter-extremism@education.gov.uk.

If an adult working in our school has concerns or identifies a student as being at risk of radicalisation, the adult should immediately make a referral to our Designated Safeguarding Lead who is also our Prevent Officer who will consider the most appropriate referral which could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

or Children's Social Care. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. The adult can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations. In an emergency, the adult will call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

- o Think someone is in immediate danger
- o Think someone may be planning to travel to join an extremist group
- o See or hear something that may be terrorist-related

We differentiate between safeguarding children who have suffered or are likely to suffer significant harm 'children at risk' and those who need additional support from one or more external agencies 'children in need'. Both will be reported immediately to the Children's Social Care. An incident referral form for 'children in need' is available at: <https://www.hertfordshire.gov.uk/media-library/documents/childrens-services/hscb/child-protection-referral-form.pdf>

Concerns about a child: if a child has suffered or is likely to suffer significant harm, the DSL must immediately report this to Children's Social Care (CSC).

Children in need of additional support from one or more agencies: the DSL also refers this to Children's Social Care (CSC) using the inter-agency assessment process (Multi Agency Safeguarding Hub (MASH)) via a referral form, thus utilising the "Team around the Child" (TAC) approaches.

The contact details for Children's Social Care are as follows:

Children's Social Care Referral and Assessment Team

9.00am – 5.00pm Monday to Friday. Telephone: **0300 123 4040**.

Out of Hours Team 5.00pm to 9.00pm and weekends Telephone: **0300 123 4043**

Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

It is mandatory for us to report any suspected cases of Female Genital Mutilation to the Police whose contact details are: Herts Constabulary (Harm Reduction Unit): 0845 330022 or non-emergency: 101 and for emergency calls: 999. For advice and guidance telephone: 0800 028 3550 Email: fgmhelp@nspcc.org.uk

OUR SAFEGUARDING PROCEDURES

Where a young person discloses abuse or neglect, the following sequence of events should be adhered to:

Create a safe environment by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that he/she is not to blame. Tell the child that you know how difficult it must have been to confide in you.

Listen to what the child has to say and take them seriously; reassure the child but advise that you cannot promise to keep a secret. Do not make promises you cannot keep. If there is a requirement for immediate medical intervention, assistance should be called for. Tell the child what you are going to do next after the disclosure. Depending on circumstances the child may then return to class or be offered time out of class with support from the DSL.

When talking to the child, do not interview the child and keep questions to a minimum. Encourage the child to use his/her own words and do not ask leading questions, interrupt their dialogue or make assumptions which might give answers. Do not repeat the disclosure over and over to the child. Do not display shock or disbelief.

Using the school's CPOMS system, record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. Record the child's name, address and date of birth along with the child's behaviour and emotional state.

Do not take responsibility for investigating the allegation yourself. Instead, immediately consult our Designated Safeguarding Lead so that any appropriate action can be taken to protect the pupil if necessary. Only tell those people that it is necessary to inform. The Designated Safeguarding Lead will consider the information and decide on the next steps. Do not approach or inform the alleged abuser. **In the absence of the DSL** inform the Deputy DSL. The **LADO** will then provide advice, instruction and direction as is relevant.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Extra - familial harms

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children may be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own

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intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Concerns and allegations made against an adult who works or volunteers or is a guest staff in the school. This applies where an adult has behaved in a way that **has harmed** a child or **may have harmed** a child or **may pose a risk of harm** to a child; possibly committed a **criminal offence** against or related to a child. All allegations are to be reported straight away to the Headteacher who will immediately contact the **LADO within one working day**, to discuss the allegation. The **LADO** considers the nature, content and context of the allegation and agrees a course of action, providing advice, instruction and direction as is relevant, including any involvement of the police. We give due weight to the views of the **LADO** and to our policy when making a decision about suspension. Stanborough School will make every effort to maintain confidentiality and guard against publicity if there are allegations against teachers, up to the point where the accused person is charged with an offence. If Stanborough School is given information suggesting that a member of staff including volunteers and visiting staff guests was abusing a child who is not a pupil at the School, the DSL would immediately report to the Local Authority Children Services and follow the procedure as if it was one of our own pupils.

- **If an allegation is made against the Head teacher, the person making the allegation or having a concern must immediately report to Pastor Brooks (Chair of the Board of Governors)** who will inform the LADO immediately and certainly within one working day. The Head teacher must not be contacted or notified. Pastor Brooks will liaise with Hertfordshire Local Authority.
- **If the allegation is made against a Governor or the Chair of Governors, the person making the allegation or having a concern must immediately contact the LADO.** The Chair of Governors will be kept informed, unless the allegation is against the Chair of Governors.

We follow Section 4.1 Hertfordshire Safeguarding Children's Board safeguarding and child protection procedures.

If an allegation is made against anyone working in the school including volunteers and visiting staff guests, Stanborough School will carefully consider whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. We give due weight to the views of the LADO and to our policy when making a decision about suspension. Arrangements for alternative accommodation away from children, in cases where a member of boarding staff is suspended pending an investigation of a child protection nature would be applied. Stanborough School will make every effort to maintain confidentiality and guard against publicity if there are allegations against staff including volunteers and visiting staff guests. These restrictions apply up to the point where the accused person is charged with an offence. The DfE/TRA publish information about an investigation or decision in a disciplinary case.

CHILD ON CHILD ABUSE

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. All staff should be aware that abuse is abuse and peer on peer abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Furthermore, they should *recognise the sexed nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child abuse is unacceptable and will be taken*

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seriously. The school will ensure that victims, perpetrators and any other child affected by child-on-child abuse will be supported by professional counselling.

Concerns and allegations of child-on-child abuse: We recognise that some pupils on occasion will negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Anti-Bullying and Behaviour Management Policies.

Peer on peer abuse can include but is not limited to:

- abuse within intimate partner relationships;
- bullying (including cyberbullying);
- sexual violence and sexual harassment;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sharing of nudes and semi-nudes (sexting)
- initiation/hazing type violence and rituals.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- o Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- o Be vigilant to issues that particularly affect different sexes – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- o Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- o Ensure pupils can easily and confidently report abuse using our reporting systems
- o Ensure staff reassure victims that they are being taken seriously
- o Ensure staff are trained to understand:
 - o How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
 - o That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - o That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
 - o That certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation

- o That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- o The important role they must play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- o That they should speak to the DSL if they have any concerns

SHARING OF NUDES AND SEMI-NUDES ('sexting')

'Sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. 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 term 'nudes' is used as it is most recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. 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.

Initial review meeting

We follow the Hertfordshire hub guidance by referring to the identifying sexual behaviours as GREEN, AMBER or RED, so that professionals across different agencies can work to the same criteria when making decisions and protect children and young people with a unified approach.

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate). If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the local neighbourhood police, dialling 101, or the local community police officer.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is

- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

Sexual violence and sexual harassment between children in school

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware that some groups are potentially more at risk. Evidence shows that the following are at greater risk:

- girls,
- children with SEND and
- LGBT children

Schools and colleges are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online

Staff should be aware of the importance of:

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

Sexual violence: when referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003²³ as described below:

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (See Sexual Offences Act 2003)

Consent

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

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create 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 (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may also include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- upskirting

Upskirting

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

All staff should be aware that abuse is abuse and peer on peer abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Furthermore, they should recognise the sexed nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer-on-peer abuse is unacceptable and will be taken seriously.

DEALING WITH A DISCLOSURE

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

Where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer significant harm,' the concern or allegation must be reported to the DSL immediately who will then contact Children's Social Care to discuss the case. A factual record should be made of the concern or allegation, via CPOMS, but no attempt at this stage should be made to investigate the circumstances. The DSL will follow through the outcomes of the concern and if so advised, will make a formal referral. If appropriate, the DSL will refer pupils to an external safeguarding agency such as Child line or NSPCC. All children involved are treated as being 'at risk'. It may be appropriate to exclude the pupil being complained about for a period, according to the school's behaviour policy and procedures. It is likely that to be considered a safeguarding concern or allegation against a pupil, some of the following features may be found:

- **Physical Abuse** - violence, particularly pre-planned; forcing others to use drugs or alcohol
- **Emotional Abuse** - blackmail or extortion; threats and intimidation
- **Sexual Abuse** - indecent exposure/touching or serious sexual assaults; forcing others to watch pornography or take part in sharing of nudes and semi-nudes (sexting)
- **Sexual Exploitation** - encouraging other children to attend inappropriate parties; photographing or videoing other children performing indecent acts

If the allegation indicates that a potential criminal offence has taken place, Children's Social Care will refer the case to the multi-agency safeguarding hub where the police will become involved. Parents, of both the pupil being complained about and the alleged victim, should be informed and kept updated on the progress of the referral. Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. This should include

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consideration of support for the victim, in the form of counselling - the school currently uses Cornerstone Counselling services. The plan should be monitored, and a date set for a follow-up review with everyone concerned.

Concerns about a child

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. Referrals should follow the local referral process. Local authority children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and The child can be kept in school if advised to do so by these agencies. The parent should be informed, and a decision should be made with Children's Social Care/police about who should do this. Normally, the DSL will try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement to making a referral to Children's Social Care if necessary. However, in accordance with DfE guidance, this will only be done when this will not place the child at risk, if there are reasonable grounds to believe that a pupil is at risk of significant harm, parental consent will not be required. It might be appropriate for the DSL to go to the police if it were felt that the situation was sufficiently serious. The child's views will also be considered. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the child and that the school will be involved in the enquiry or police investigation.

When a pupil needs *urgent* medical attention and there is suspicion of abuse, an ambulance should be called. If the response from the emergency services states that the school should take the child to hospital then the DSL, with an escort, should take the child to the Accident and Emergency Unit at the nearest hospital. They should first notify Children's Social Care (CSC) and seek advice about what action the CSC or the police will take and how the parents will be informed. Normally, parents would be informed that a child requires urgent hospital attention. If the suspected abuse is sexual then the medical examination should be delayed until the CSC and the police can liaise with the hospital, unless the needs of the child are such that medical attention is the priority. There must always be a responsible adult with the child, whether from the school, CSC or the police, if the parents are not included. All unnecessary delays should be eradicated and inaction at any level can and should be challenged. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed.

In preparing this policy we are attentive to the nature, age range and other significant features of the school in the provisions made for safeguarding. With an age range from 11-18 we are also aware of the potential scope for problems relating to emotional and mental health issues, body image, eating disorders, self-harm, and also radicalisation and extremism.

Contextual Safeguarding: Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (or deputy) should be considering

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the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Any adult can harm a child either by direct acts or failure to provide proper care, or both. This may be through neglect, emotional, physical or sexual abuse or a combination of such types. Our children have the right to respect and protection from abuse, regardless of age, sex, ability, language, religion, race, nationality, sexuality, culture or disability. **They have the right to feel valued and confident, knowing how to approach adults if they are in difficulty. In our school a bullying incident is treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Our safeguarding Child Protection Policy is also dove-tailed with the Behaviour Management and Anti-bullying Policies.**

Our staff are advised to maintain an attitude of 'it could happen here' as far as safeguarding is concerned. Staff and volunteers should always act in the interest of the child. We work with other agencies to reduce risk and promote the welfare of children within the same safeguarding procedures. Our school does not operate in isolation.

Purpose: This policy provides staff, volunteers, guest staff and the Governors with the guidance they need in order to keep children safe and secure in our school and informs parents and guardians how we will safeguard their children whilst they are in our care. There are three main elements to the school's safeguarding policy:

- **Prevention:** Our aim is to provide a positive and safe school environment, careful and vigilant teaching, accessible pastoral care and support to students, good adult role models. We check and record the suitability of staff and volunteers to work with children;
- **Protection:** Staff including volunteers and visiting staff guests are trained and supported to respond appropriately and sensitively to safeguarding concerns following our agreed procedures. We identify and act on early signs of abuse and neglect and reassess concerns when situations do not improve. We ensure that allegations or concerns against staff are dealt with promptly, and in accordance with DfE and local guidance. We keep accurate records and share relevant information quickly in order to challenge inactivity.
- **Support:** We support students who may have been at risk of significant harm which includes the way staff respond to their concerns and any work that may be required. We also support pupils who have been abused, in accordance with their agreed child protection plan.

Whole Staff Responsibilities: Stanborough School recognises that because of regular and sustained contact with children, school staff including volunteers and visiting staff guests are well placed to observe the outward signs of abuse. Staff including volunteers and visiting staff guests are aided in their responsibilities by the DSL. Staff including volunteers and visiting staff guests will:

- follow the procedures set out by the Hertfordshire County Council along with taking account of KCSIE (DfE: September 2023)
- Have regular reviews of their own practice and opportunities to discuss any concerns they may have about welfare and safeguarding concerns to the DSL, or, in the absence of action, directly to local children's services.

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- understand how to protect children from radicalisation and identify, assess children at risk of being drawn into terrorism;
- be alert to the signs of abuse and have a responsibility for referring any concerns to the DSL; and
- know they may make a referral directly to Children's Social Care relating to a child, or direct to the LADO if relating to an adult who is a member of the school staff including volunteers and visiting staff guests whilst keeping the DSL informed.

Governors Responsibilities and Function regarding the management of safeguarding include ensuring:

- they champion child protection issues within the school and liaising with and holding to account the Designated Safeguarding Lead and the Head teacher;
- our safeguarding policy and procedures are checked for impact and reviewed yearly accordingly;
- a co-ordinated offer of early help is provided when additional needs of children are identified and contributes to inter-agency plans to provide additional support to children subject to child protection plans;
- that there is a nominated safeguarding governor of the board to liaise with the designated officers from the local authority and partner agencies in the event of allegations of abuse made against the Head teacher/Governors;
- the staff's including volunteers and visiting staff guests understanding and implementation of the policy, especially regarding the referral process; and
- Members of the Senior Leadership Team are appointed to the role of DSL and Deputy DSL respectively.
- Use of school or college premises for non-school/college activities 166. Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe. 167. When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. This applies regardless of whether the children who attend any of these services or activities are children on the school roll or attend the college. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Teaching Children How to Keep Safe:

The Head teacher and the Chair of Governors will carefully monitor the school's arrangements to educate and encourage pupils to keep safe through considering how best to educate children about

safeguarding issues, including online issues. The internet and the use of social media in particular has become a major factor in the radicalisation of young people; we ensure that children are safe from terrorist and extremist material when accessing the internet on school systems through appropriate levels of filtering, internet safety rules and e-safety education within the curriculum and in tutor time (in line with our E-safety and Cyber and Anti Bullying policies which are on our website and within our Integrated Safeguarding Portfolio). Children understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. We support parents in providing links to up-to-date advice and guidance on Internet-Safety, social media and on-line radicalisation through CEOP's *Thinkuknow* website www.thinkuknow.co.uk and the Google Legends project <https://www.google.co.uk/safetycenter/families/legends/>

Within Spiritual, Moral Social and Cultural (SMSC) development, we instil within pupils, values that build resilience and prevent children being drawn into radicalisation and extremism. We explore what extremism might look like and how this poses a threat to peace, and we build resilience to radicalism by providing a safe environment for debating controversial issues. We actively promote British Values within our SMSC and create an environment in which children know they are listened to and valued.

Induction and On-Going Training for all staff, temporary staff, volunteers, guest staff, the Head teacher, and the Governors:

All staff including volunteers and visiting staff guests are given and required to read Part 1, Part 5 and Annex A of every new edition of *Keeping Children Safe in Education* (KCSIE), the latest being DfE: September 2023 which includes the relevance of both mental and physical health to safeguarding and the welfare of children. This applies not only to new staff including volunteers and visiting staff guests but also those already in post. Stanborough School ensures that sufficient relevant staff are trained in safer recruitment processes. We consult with the Hertfordshire Local Safeguarding Children's Partnership (HSCP) to determine the most appropriate schedule, level and focus for training. For staff including volunteers and visiting staff guests who cannot read or speak English, our school takes steps to ensure that they understand key information. The school has arrangements to listen to children by use of counsellors, listeners, helplines and other systems to gain views and insight.

Stanborough School arrangements for induction, full safeguarding and refresher training is also in accordance with Local Authority procedures and also as required in KCSIE (DfE:September 2023) as follows:

1. The child protection policy, staff code of conduct, behaviour policy, anti-bullying policy, whistleblowing policy and e-safety including cyber bullying, along with the implications for mental health and pastoral care and how to identify children at risk of radicalisation.
2. The identity of the DSL and DDSL's.
3. The active promotion of British values and an understanding of extremism and radicalisation.
4. The DSL undertakes *Prevent* awareness training and can provide advice and support to other members of staff on protecting children from the risk of radicalisation.

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5. The *Prevent* strategy requires that our staff have training that gives them knowledge and confidence to identify children at risk of being drawn into terrorism, to challenge extremist ideas and to know how to refer children and young people for further help. WRAP training is provided for all staff. We also can access Channel on-line general awareness training. We work in partnership with local *Prevent* co-ordinators.
6. We make it clear in induction and other training, and in guidance provided for staff including volunteers and visiting staff guests that they have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. This is one part of our establishing a positive safeguarding culture in the school.
7. Staff receive weekly safeguarding updates (Andrew Hall) from the PA to the Head Teacher.
8. Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Prevent Duty (in line with 2022 guidance): Please refer to our Preventing Extremism and Radicalisation policy.

All staff are fully aware of their duty of assessing the risk of our students being drawn into terrorism including support for terrorist ideology fundamental to which are extremist ideas. It is essential that staff including volunteers and visiting staff guests can identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is seen as part of Stanborough's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. We build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. Our school teaches young people how to make positive choices about their lives and endorses the Channel early intervention scheme for students who could be at risk of radicalisation. In addition, to Prevent training for the DSL and deputy DSL this is expanded to include the whole staff including volunteers and visiting staff guests. Whilst we attend training recommended by the local authority and the <https://schoolleaders.thekeysupport.com/>, the training (on-line) opportunities through the *Home Office Prevent Awareness* programme is to be accessed. <http://www.elearning.prevent.homeoffice.gov.uk>

Radicalisation: Radicalisation is defined in the government's Prevent strategy as "the process by which a person comes to support terrorism and forms of extremism leading to terrorism". It is a social process but also a deeply personal experience. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. Our school responds to pupils who may be targeted or influenced to participate in radicalism or extremism. Our school also ensures that we

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can “demonstrate activity”, as required by the statutory guidance, in the following key areas: risk assessment, working in partnership, staff training and IT policies.

POSSIBLE SIGNS OF EXTREMISM/RADICALISATION

Those in the process of being radicalised may become involved with a new group of friends, search for answers to questions about identity, faith and belonging, possess extremist literature or advocate violent actions, change their behaviour and language, or may seek to recruit others to an extremist ideology. The following could describe general teenage behaviour but together with other signs may mean the young person is being radicalised:

- out of character changes in dress, behaviour and changes in their friendship group
- losing interest in previous activities and friendships
- secretive behaviour and switching screens when you come near.

The following signs are more specific to radicalisation:

- owning mobile phones or devices parents/guardians haven't given them
- showing sympathy for extremist causes
- advocating extremist messages
- glorifying violence
- accessing extremist literature and imagery
- showing a mistrust of mainstream media reports and belief in conspiracy theories
- appearing angry about governmental policies, especially foreign policy

It is important to note, that children and young people experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour including alcohol or drug abuse, family breakdown, domestic abuse, bullying, etc., or even something less worrying. It is important to be cautious in assessing these factors, to avoid inappropriately labelling or stigmatising individuals because they possess a characteristic or fit a specific profile. It is vital that all professionals who have contact with vulnerable individuals are able to recognise those vulnerabilities and help to increase safe choices.

DSL and Deputy DSL Responsibilities and Job Role (including the Prevention of Radicalisation in line with KCSIE (DfE: September 2023):

The core responsibility of the DSL is to maintain an overview of safeguarding within the school, including on-line safety, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice.

Managing Referrals

- to refer all cases of suspected abuse to Children's Social Care and
- the LADO for child protection allegations which concern a member of staff or volunteer or staff guest,
- the Disclosure and Barring Service where a person is dismissed or left due to risk/harm to a child and/or the police if a crime may have been committed;
- Police (in cases where a crime may have been committed);

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- to liaise with the Head teacher and Governors, as well as the Hertfordshire Local Safeguarding Children's Board (LSCB) and the LADO
- ensure staff including volunteers and visiting staff guests are alert to changes in children's behaviour which could indicate that they may need help or protection.
- use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Training

The DSL receives appropriate training, in accordance with Annex B of KCSIE, carried out every two years in order to:

- understand the assessment process for providing early help and intervention;
- have a working knowledge of and be able to attend and contribute to child protection case conferences;
- have access to and understands the school's child protection policy and procedures; and
- be able to keep detailed, accurate, secure written records of concerns and referrals.
- Training includes the inter - agency working according to the local authority guidance

Raising Awareness

The DSL ensures Stanborough School policies are known and used appropriately. This is achieved in part by:

- the policy, procedures and their implementation being reviewed annually;
- the policy being made available publicly;
- making sure staff are aware of training opportunities and the latest local policies on safeguarding;
- ensuring that pupils' child protection files are transferred securely and confidentially to the new school or college as soon as possible, with a receipt being received;
- ensuring all staff and volunteers understand their safeguarding responsibilities and always act in the interest of the child;
- raising awareness of the needs of pupils including those with special educational needs or disabilities, lesbian, gay, bisexual and transsexual (LGBT) pupils.

Safeguarding Support for Staff

To ensure that staff are equipped to deal with safeguarding issues, various types of training are offered. All staff receive Safeguarding training at induction. They are also required to undergo safeguarding training with the local authority, every three years. They receive updated Safeguarding training annually via the DSL and also online training through The Key. Regular updates are sent to staff via e-mail. Safeguarding is an agenda item at all meetings, including Staff Briefing.

Staff who may need support when dealing with safeguarding issues (ie Form Tutors) will be supported by the DSL or DDSL. They will be referred to external agencies where necessary, including Generali and Cornerstone Counselling.

Support for staff who may have to attend a Safeguarding Conference – the DSL will support the staff member through the process and attend the conference if necessary.

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Early Help

Working together to Safeguard Children (updated July 2022) aims to inform schools and other agencies about the suitable action to take when a child has been identified as making inadequate progress or having an unmet need. At Stanborough, whenever possible, we will ensure that early intervention is actioned via a referral to Hertfordshire Family Support Team via a CAF form as soon as the criteria are met, to prevent situations from escalating into larger problems.

Single Point of Access Telephone: 08:00 – 19:00: Single Point of Access 0300 777 0707

a. 17:00 – 09:00 Out of Hours 01438 843322.

Therefore, the school will consider the following:

- Undertake an assessment of the need for early help
- Provide early help services e.g., pastoral worker, SENCO, family outreach worker, targeted youth, breakfast club
- Refer to appropriate services e.g., CAMHS etc.

Staff will be particularly alert to the potential need for early help for a child who:

- 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 in to 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 alcohol or drugs themselves
- Has returned home to their family from care and
- Is a privately fostered child
- Is persistently absent from education

Missing Children: Our staff including volunteers and visiting staff guests will follow the school's procedures for dealing with children who go missing, particularly on repeat occasions. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation. Stanborough has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. Staff including volunteers and visiting staff guests are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. More information can be found in 'Statutory guidance on children who run away or go missing from home or care' and KCSIE (DfE: September 2023). Stanborough School has an admission

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register and an attendance register. All pupils are placed on both registers. We will follow-up unexplained absences of any child with a telephone call from the School on the morning of the first day of absence and notify social services if there is an unexplained absence of more than two days of a pupil who is on the child safeguarding register. Additionally, the Registrar will notify the Local Authority when a child moves to a new school at any point during their time at Stanborough School.

Safer Recruitment (please refer to our safer recruitment policy) and Employment of Staff and Single Central Record)

We operate safe recruitment procedures, particularly pre-appointment checks on staff including Disclosure and Barring Service (DBS) checks, but also pre-appointment checks on volunteers, staff guests, staff of contractors and other individuals that are not school staff or supply staff. Stanborough School follows the Government's recommendations for the safer recruitment and employment of who work with children. The *Single Central Register* (SCR) is rigorously maintained, with all employees and volunteers being checked in accordance with its full requirements before starting work.

Safeguarding arrangements for staff employed by another organisation

The school will ensure that formal procedures are followed to satisfy itself that appropriate child protection checks and procedures apply to any staff including volunteers and visiting staff guests employed by another organisation and working with the school's pupils on another site (for example, on a school trip, while in a separate institution or activity centre). See policy on Educational Visits. Stanborough will obtain DBS checks on all contractor staff, who also receive safeguarding training from the Designated Safeguarding Lead.

Requirement to inform Disclosure and Barring Service (DBS) and to consider referral to TRA: The School will report to both the Disclosure and Barring Service (DBS) and TRA, within one month of leaving the school, any person (whether employed, contracted, visiting staff guest, volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes making a referral where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. We also ensure that '*Compromise Agreements*' or '*ACAS Agreements*' never apply in such circumstances. If there has been a substantiated allegation against a member of staff including volunteers and visiting staff guests, the school works with the LADO to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

Visitors and Visiting Speakers: Visitors are required to produce identity and to wear a school visitor identity badge. Unidentified visitors will be challenged by staff or reported to the Head teacher or School Office. The *Prevent* statutory guidance requires schools to set out clear protocols for ensuring that any visiting speakers, who might fall within the scope of the *Prevent* duty, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised; this will always include a barred list check and internet search. At Stanborough School, speakers are never left alone with pupils. The interaction between the *Prevent* requirement to check speakers and the KCSIE (DfE: September 2023) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers. We decide

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which checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organisation.

Schools and colleges should:

- ensure that at least two people carry out the shortlisting exercise (it is recommended that those who shortlist carry out the interview for a consistent approach)
- consider any inconsistencies and look for gaps in employment and reasons given for them, and,
- explore all potential concerns

Vulnerable Pupils: Vigilance will be exercised in respect of pupils who are the subjects of Child Protection Plans and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing). If a pupil discloses that he/she has witnessed domestic violence or it is suspected that he/she may be living in a household which is affected by family violence, this will be referred to the DSL as a safeguarding issue. Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Children's Social Care and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies. Particular attention will be given to pupils who are on the SEND list or have health conditions.

Looked After Children: The Chair of Governors will ensure staff including volunteers and visiting staff guests have the skills, knowledge and understanding necessary to keep safe, children who are looked after by a Local Authority, if they have such children on roll. This includes ensuring that there is a designated member of staff with responsibility for their welfare, progress and educational achievement and ensuring this person has up to date assessment information from the relevant Local Authority. This includes the child's social worker and virtual head, the most recent care plan and contact arrangements with parents, and delegated authority to carers including the child's legal status. In our school this person is the DSL.

See <https://www.gov.uk/government/publications/promoting-the-education-of-looked-after-children>

Safeguarding Disabled children: Our staff including volunteers and visiting staff guests are aware that disabled children experience greater risks, vulnerability and unequal access to services and resources. They may have additional needs relating to physical, sensory, cognitive and/or communication impairments. Some disabled children may be more vulnerable to abuse because they may have fewer outside contacts than other children; receive intimate, personal care; have an impaired capacity to resist or avoid abuse; have communication difficulties; fear losing services; be more vulnerable to peer abuse (e.g., bullying, sexual assault, intimidation).

Physical Chastisement: Where a child has been or alleges, they have been subject to chastisement using an implement or substance, this will immediately be reported for investigation to the LADO.

Working in Partnership and Responding to Parents and Carers: Our school works in partnership with parents/guardians/carers and local authorities communicating as clearly as possible with them (with parents for whom English is not their first language) for the best outcomes for children.

School Website Safeguarding Statement: To ensure the privacy and safety of children at the school, only children's first names are used. Stanborough School follows a policy of seeking parent, guardian or carer's permission before using images which show children on the website or in the local press. The list showing pupils who are barred from appearing in the press, or on the website, is kept in the School Office and is available whenever photographers are present. No private information about children is published on the website such as surnames or contact details.

Staff Code of Conduct - Power, Positions of Trust and Staff Behaviour: Guidance is provided in the Stanborough School *Staff Code of Conduct* (which is on the website) and *Teachers' Standards* on how adults can ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, etc). The Staff Code of Conduct is wide-ranging and covers staff/pupils relationships and communications including use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy.

Listening to the wishes of children and young people: Stanborough School has a culture of ensuring that children's wishes, and feelings are considered when determining what action to take and what services to provide to protect individual pupils. We believe it is critical that our pupils have an adult who they can trust and Stanborough School ensures that there are appropriate systems so pupils know who they can turn to and that staff will listen to them. These include: the School Council; Form tutors; Spiritual, Moral, Social and Cultural (SMSC) development and Helplines such as NSPCC and Child line (Contact numbers are at the end of this policy). Our staff do not agree confidentiality and always act in the interests of the child.

Records:

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'. Written notes will be kept of all incidents relating to individual pupils. These may be shared with other agencies. All contact with parents and external agencies relevant to Child Protection will be logged and kept in confidential records which are kept separate from educational records and can only be accessed by designated people within the school. The content of Child Protection reports will be shared with the parents/guardians/carers in advance of any meetings. Referrals made to the Hertfordshire Council Children's Social Care are recorded on the Inter-agency Referral form.

If a pupil is withdrawn from the school, all efforts will be made to identify the school to which the student is being admitted; their confidential educational and child protection records will be

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sent separately. If the parent/guardian/carer fails to provide information regarding the new school, an urgent referral will be made to Children's Social Care. If educational records are sent to our school concerning a child who is not registered by the parent, they will be returned and the school advised to refer to their Local Authority Education Welfare Service. A child's name will only be removed from the School's Admission Register in accordance with the Student Registration Regulations. Further information is contained in our Admissions Policy.

Whistleblowing Our whistleblowing policy, which is on the school website, is integrated into training and codes of conduct. We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within our school and to external agencies where necessary. This is one part of the way in which we establish in our school, a positive safeguarding culture. We have an open environment and culture of safety where staff feel free to raise concerns. The school also has a culture of valuing staff and of reflective practice. There are procedures for reporting and handling concerns, including poor or unsafe practice and potential failures in the safeguarding regime, provision for mediation and dispute resolution where necessary. Training and support are provided for staff including transparency and accountability in relation to how concerns are received and handled. Stanborough School has regard to KCSIE (DfE: September 2023) and as a result has clear processes for reporting and recording allegations.

Co-operation with the Hertfordshire Safeguarding Children Partnership (HSCP): We cooperate entirely with any investigation carried out by the Children's Social Care, including those involving the LADO, in conjunction with the police. Our policy is in accordance with the guidance provided in KCSIE (DfE: September 2023).

Confidentiality: We regard all information relating to individual child or adult protection issues as confidential and we only pass information on to appropriate persons. Our staff including volunteers and visiting staff guests know they cannot promise confidentiality and that there are other agencies which children can turn to e.g., Child line: 0800 1111.

Child's Death: In the event of a death of a child, the Head teacher must notify both the Hertfordshire Child Death Overview Panel (CDOP), RIDDOR which is the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (2013) and the DfE.

Staff including Volunteers and visiting Staff Guests Taking Medication or other Substances: Staff including volunteers and visiting staff guests must seek medical advice if they are taking medication which may affect their ability to care for children, and any staff including volunteers and visiting staff guests' medication must be securely stored and out of the reach of children at all times.

Types and Signs of Abuse and Neglect including Possible Indicators

This section of the policy encompasses the types of abuse and neglect signs which are identified in Keeping Children Safe in Education (DfE: September 2023)

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Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of **witnessing ill treatment of others**. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

Types of Abuse and Neglect: *Working Together to Safeguard Children* (HM Government, 2019) defines abuse as 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. An adult or adults or another child or children may abuse them. *Part 4 of KCSIE to Safeguard Children* (HM Government, 2023) further states that the type of abuse and neglect include: *Abuse and Neglect; Neglect; Physical abuse; Extremism/Radicalisation; Domestic Abuse; Drug/alcohol abuse; Emotional abuse; Abuse of Trust; Sexual abuse; Children who sexually abuse other children; Child Sexual Exploitation; Child exploitation and E-safety; Female Genital Mutilation; Forced Marriages; Safeguarding Disabled Children; Disability and Vulnerability Honour-based violence; Vulnerable Groups; Vulnerable Pupils; Children in Need; Children who run away or go missing and Significant Harm.*

Abuse can also take place wholly online or it can be used to facilitate offline abuse.

Specific safeguarding issues: Expert and professional organizations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website www.nspcc.org.uk/preventing-abuse/. Schools and colleges can also access broad government guidance on the issues listed here via the GOV.UK website: child sexual exploitation (CSE); bullying including cyberbullying; domestic violence; drugs; fabricated or induced illness; faith abuse; female genital mutilation (FGM); forced marriage; gangs and youth violence; sex-based violence/violence against women and girls (VAWG); mental health; private fostering; radicalization; sharing of nudes and semi-nudes'; teenage relationship abuse and trafficking.

Online safety and the use of mobile technology

KCSIE 2023 says that your policies on online safety and the use of mobile and smart technology should be reflected in your child protection and safeguarding policy.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors

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- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Designated safeguarding leads (DSL) are responsible for understanding the filtering and monitoring systems each school has in place. This means that DSLs need to take the time to understand the kinds of websites students are visiting, for example.
- *“An understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring”* should be included in safeguarding and child protection training at induction for all staff.

The 4 key categories of risk

- Our approach to online safety is based on addressing the following categories of risk:
- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as 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** – personal online behaviour that increases the likelihood of, or causes, harm, such as 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; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year, looking at the 3 main areas of risk for children online, popular apps and their risks, of cyber-bullying and Incidents of sharing nudes and semi-nudes

- Educate parents/carers about online safety via our website, communications sent directly to them via the newsletter. We will also share clear procedures with them so they know how to raise concerns about online safety

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- Staff including volunteers and visiting staff guests should not use mobile telephones in the presence of children. Personal mobile telephones should never be used for taking or storing images or recordings of pupils. Any images or recordings should only be taken, edited or stored on school cameras or computers, unless with the express permission of the Head teacher. Photographs or recordings should only be made where there is a legitimate school purpose. A pupil's privacy and dignity must be preserved at all times. Images or recordings should not be transmitted to third parties without permission of the Head teacher or parents of the child involved. This guidance also applies to all pupils.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

Female Genital Mutilation: Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously. It is mandatory for our school to report to the police cases where we suspect or discover that an act of FGM appears to have been carried out. Our school activates local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Possible Signs of FGM

A female pupil who has had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college

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- be particularly reluctant to undergo normal medical examinations by a doctor
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm
- a significant change in wellbeing,
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Staff must share their concerns with the DSL or if the child is in imminent danger, call the police.

Mental Health

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

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

- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, and their high prevalence of special educational needs and mental health needs, can impact on their 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 the Child Protection policy and speaking to the designated safeguarding lead or a deputy.

County lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money.

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school). The school will monitor pupil attendance and follow-up any unexplained absences. A referral will be made to the Child Social Services where necessary.

Domestic Abuse

- The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of sex or sexuality.
- The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.
- All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

All concerns relating to domestic abuse must be reported to the DSL. If the child's life is in imminent danger, staff must call the police.

INDICATORS OF ABUSE

NEGLECT

Definition of neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors. Far more children are registered to the category of neglect on child protection plans than to the other categories. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group. Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children would suggest that an appropriate

intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the designated person/child protection co-ordinator.

Indicators of neglect: The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect include: constant hunger and stealing food; poor personal hygiene – unkempt, dirty or smelly; being underweight; wearing dress unsuitable for weather; poor state of clothing; illness or injury untreated and looking sad, false smiles.

Behavioural indicators of neglect include: constant tiredness; frequent absence from school or lateness; missing medical appointments; becoming isolated among peers; being frequently unsupervised; stealing or scavenging, especially food and having destructive tendencies.

EMOTIONAL ABUSE

Definition of emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve 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.

The nature of emotional abuse: Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove. Emotional abuse is chronic and cumulative and has a long-term impact. All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Children can be harmed by witnessing someone harming another person – as in domestic violence. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of Emotional Abuse: Developmental issues include delays in physical, mental and emotional development; poor school performance and speech disorders, particularly sudden disorders or changes.

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Behaviour: acceptance of punishment which appears excessive; over-reaction to mistakes; continual self-deprecation (I'm stupid, ugly, worthless etc); neurotic behaviour (such as ricking, hair-twisting, thumb sucking); self-mutilation; suicide attempts; drug/solvent abuse; running away; compulsive stealing, scavenging; acting out; poor trust in significant adults; regressive behaviour – e.g. wetting; eating disorders; destructive tendencies; neurotic behaviour; arriving early at school, leaving late.

Social issues: withdrawal from physical contact or from social interaction; over-compliant behaviour or insecure, clinging behaviour; poor social relationships.

Emotional responses: extreme fear of new situations; inappropriate emotional responses to painful situations (“I deserve this”); fear of parents being contacted; self-disgust; unusually fearful with adults; lack of concentration, restlessness, aimlessness; extremes of passivity or aggression.

PHYSICAL ABUSE

The nature of physical abuse: Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* e.g. shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present. A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school. Physical abuse 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.

Indicators of physical Abuse/Factors that should increase concern include:

- multiple bruising or bruises and scratches (especially on the head and face); clusters of bruises – e.g., fingertip bruising (caused by being grasped); bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- bruises on the back, chest, buttocks, or on the inside of the thighs; marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle;
- bite marks; deliberate burning may also be indicated by the pattern of an instrument or object - e.g., electric fire, cooker, cigarette; scalds with upward splash marks or *tide marks*; untreated injuries;
- recurrent injuries, burns or bald patches; having broken bones or unexplained bruising, burns or welts in different stages of healing; being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.

In the social context of the school or college, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when: the explanation given does not match the injury; the explanation uses words or phrases that do not match the vocabulary of the child (adults words); no explanation is forthcoming;

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the child (or the parent/carer) is secretive or evasive or the injury is accompanied by allegations of abuse or assault. **We become concerned if the child or young person** is reluctant to have parents/carers contacted; runs away or shows fear of going home; is aggressive towards themselves or others; flinches when approached or touched; is reluctant to undress to change clothing for sport; wears long sleeves during hot weather; is unnaturally compliant in the presence of parents/carers; has a fear of medical help or attention or admits to a punishment that appears excessive.

SEXUAL ABUSE

Staff assume that sexual harassment and online sexual abuse are happening in school, even when there are no specific reports, and a whole-school approach to address issues has been put in place. This includes:

- a Relationships and sex education (RSE), based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This includes time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending pictures/videos of 'nudes'
- Support for teachers delivering RSE and opportunities for external providers to address key issues
- routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse
- a behavioural approach, including sanctions when appropriate, to reinforce a culture where sexual harassment and online sexual abuse are not tolerated
- working closely with Local Safeguarding Partners (LSPs) in the area so they are aware of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour
- support for designated safeguarding leads (DSLs), including protected time in timetables to meet and discuss key issues or topics
- training to ensure that all adults can:
 - better understand the definitions of sexual harassment and sexual violence, including online sexual abuse
 - identify early signs of peer-on-peer sexual abuse
 - consistently uphold standards in their responses to sexual harassment and online sexual abuse

Sexual Abuse Records

We are required to supply records of sexual abuse to the inspection team. All records are stored centrally with the Headteacher.

The nature of sexual abuse: Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as

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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). Some young people do not exhibit any external signs of abuse.

Characteristics of child sexual abuse: it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic; grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent; grooming the child’s environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Indicators of sexual abuse: Physical observations include damage to genitalia, anus or mouth; sexually transmitted diseases; unexpected pregnancy, especially in very young girls; soreness in genital area, anus or mouth and other medical problems such as chronic itching; unexplained recurrent urinary tract infections and discharges or abdominal pain.

CHILD SEXUAL EXPLOITATION AND CHILD CRIMINAL EXPLOITATION

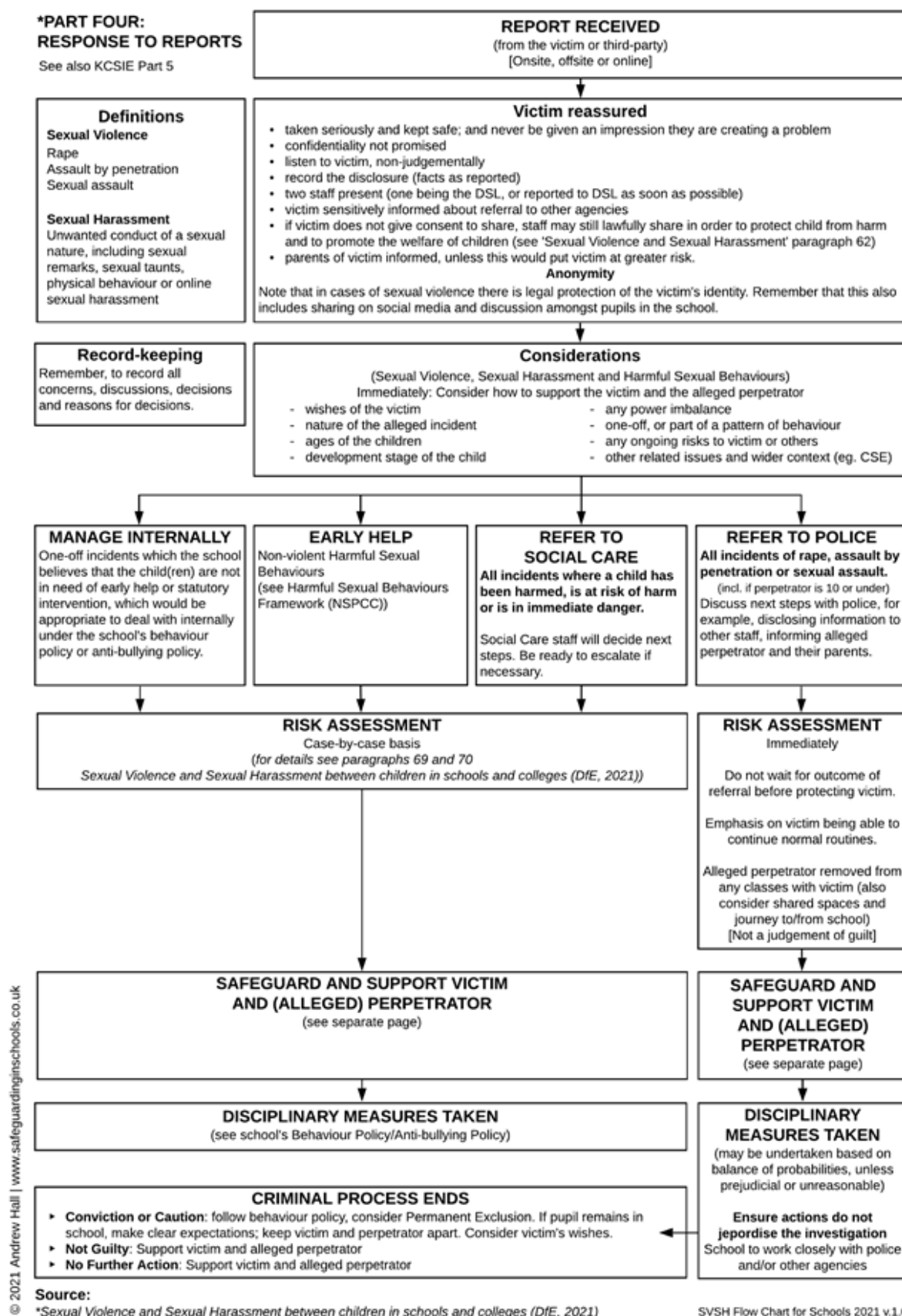
Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including:

- sex
- sexual identity
- cognitive ability
- physical strength
- status and
- access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place

Sexual Violence and Sexual Harassment (Flowchart)

Below is a flowchart to help us plan for incidents of Sexual Violence and Sexual Harassment. The actions are taken from the government's guidance document, Sexual Violence and Sexual Harassment, and Keeping Children safe in Education (2023).



CHILD SEXUAL EXPLOITATION

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity:

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

POSSIBLE SIGNS OF CHILD SEXUAL EXPLOITATION

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.

Young people who are being sexually exploited may:

- be involved in abusive relationships, intimidated and fearful of certain people or situations
- hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- associate with other young people involved in sexual exploitation
- get involved in gangs, gang fights, gang membership
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- not know where they are, because they have been moved around the country
- go missing from home, care or education.

They may also show signs of sexual abuse or grooming.

Behavioural observations

- Sexual knowledge inappropriate for age; Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity; Hinting at sexual activity inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging, Lack of concentration, restlessness, aimlessness; Socially isolated or withdrawn, Overly-compliant behaviour; Acting out, aggressive behaviour

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- Poor trust or fear concerning significant adults; Regressive behaviour, Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour; Arriving early at school, leaving late, running away from home, Suicide attempts, self-mutilation, self-disgust; Suddenly drawing sexually explicit pictures; Eating disorders or sudden loss of appetite or compulsive eating, Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed; Trying to be 'ultra-good' or perfect; overreacting to criticism.

Note: The concerns listed above are not exhaustive. Staff can and should also record and report other concerns about a student, such as general welfare concerns.

CHILD CRIMINAL EXPLOITATION

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county line), forced to shoplift or pickpocket, or to threaten other young people.

Possible signs of CCE

Some of the following can be indicators of CCE but this is not exhaustive:

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

Staff must share their concerns with the DSL or if the child is in imminent danger, call the Police.

REPORTING SAFEGUARDING CONCERNS

Pupils who are absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns including sexual abuse, sexual exploitation or child criminal exploitation.

A) Concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

If you have a concern about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger), speak to the DSL **as soon as possible**, first to agree a course of action (or deputy DSLs in their absence) and log the incident on CPOMS.

B) Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible and put this in writing as well, within 24 hours. If the concerns/allegations are about the headteacher, speak to the chair of governors **as soon as possible** and put this in writing as well, within 24 hours.. Do not log the incident on CPOMS

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO), **as soon as possible** and put this in writing as well, within 24 hours. Do not log the incident on CPOMS

Aside from these people, do not disclose the information or the names of the alleged perpetrator/victim to anyone else unless told to do so by the person you reported the incident to.

C) Concerns about extremism

If staff have concerns relating to extremism and the child is not suffering or likely to suffer from harm, or in immediate danger, they are to take immediate action by following the steps in section A.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel or the Department for Education, which has a dedicated telephone helpline, 020 7340 7264. They can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations. In an emergency, they can call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

D) Mental health concerns

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. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, they are to take immediate action by following the steps in section A.

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If you have a mental health concern that is **not** also a safeguarding concern, speak to Mrs Anderson to agree a course of action.

D) Allegations of abuse made against other pupils

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation on CPOMS and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

E) Allegations Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they are to take immediate action by following the steps in section A.

You must **not**:

- o View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- o Delete the imagery or ask the pupil to delete it
- o Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- o Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- o Say or do anything to blame or shame any young people involved

F) Allegations of FGM

Any member of staff who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and school staff may face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Considering confidentiality and anonymity Confidentiality

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The school or college should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation. The victim may ask the school or college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.

Advice should be sought from the designated safeguarding lead (or a deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases. 474. Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered. Additional information on confidentiality and information sharing is available at Safeguarding Practitioners Information Sharing Advice and NSPCC: Information sharing and confidentiality for practitioners. Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses.

As a matter of effective safeguarding practice, schools and colleges should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the

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report, which staff should know about the report and any support that will be put in place for the children involved.

Schools and colleges should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. The unique challenges regarding social media are discussed at paragraph 466 (KCSIE 2023) along with potential support. In addition, the principles described in Child net's cyberbullying guidance could be helpful. Risk assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should consider:

- the victim, especially their protection and support
 - whether there may have been other victims
 - the alleged perpetrator(s)
 - all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
 - The time and location of the incident, and any action required to make the location safer.
481. Risk assessments should be recorded (paper or electronic) and should be kept under review.

At all times, the school or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect

Our Integrated Safeguarding Portfolio consists of the following legal status documents, related documents and references which have been used in formulating this policy along with the forms required to be completed when referring to Children's Social Care and the LADO and the Governors' Annual Safeguarding Audit and Review.

Legal Status (statutory and best practice guidance)

- Part 3, paragraphs 7 (a) and (b) of the Education (Independent School Standards) (England) Regulations 2014, in force from the 5th January 2015 and as amended in September 2015
- *Keeping Children Safe in Education* (KCSIE) *Information for all school and colleges* (DfE: September 2023) incorporates the additional statutory guidance, *Disqualification under the Childcare Act 2006* (February 2015) and also refers to non-statutory advice for practitioners, *what to do if you're worried a child is being abused* (HM Government: March 2015)
- Prevent' Counter-Terrorism and Security Act 2015 (HM Government: 2015) inclusive of the Revised Prevent Duty Guidance: for England and Wales (April 2019) (Prevent). Prevent is supplemented by The Prevent duty: Departmental advice for schools and childminders Updated 2019) and the use of social media for on-line radicalisation (July 2015)
- The Children Act 1989 guidance and regulations (DfE: Volume 2, June 2015)
- National Minimum Standards (DfE:2015)

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This policy has been compiled in conjunction with and reference to the following related documents which are:

- **available on the Stanborough School website and also on request from the school office:** Anti-bullying; Behaviour Management including Discipline, Rewards and Sanctions and Exclusions; Preventing Extremism and Radicalisation Policy; First aid; Educational Visits and Off-site activities; E-Safety including Cyber Bullying and Acceptable Use; Personal Social Health and Economic Education (PSHEE); Sex and Relationship Education (SRE); Special Educational Needs and Disabilities (SEND Code of practice January 2015); Spiritual, Moral, Social and Cultural (SMSC) Development; Whistleblowing, Staff Code of Conduct; *Keeping Children Safe in Education Information for all school and college staff* (DfE: September 2023).
- **available on the Staff Shared drive:** Safe Recruitment including the selection and appointment of staff; *Keeping Children Safe in Education. Statutory guidance for schools and colleges.* (DfE: September 2023); Appendix A & B - Safer Recruitment Flowcharts

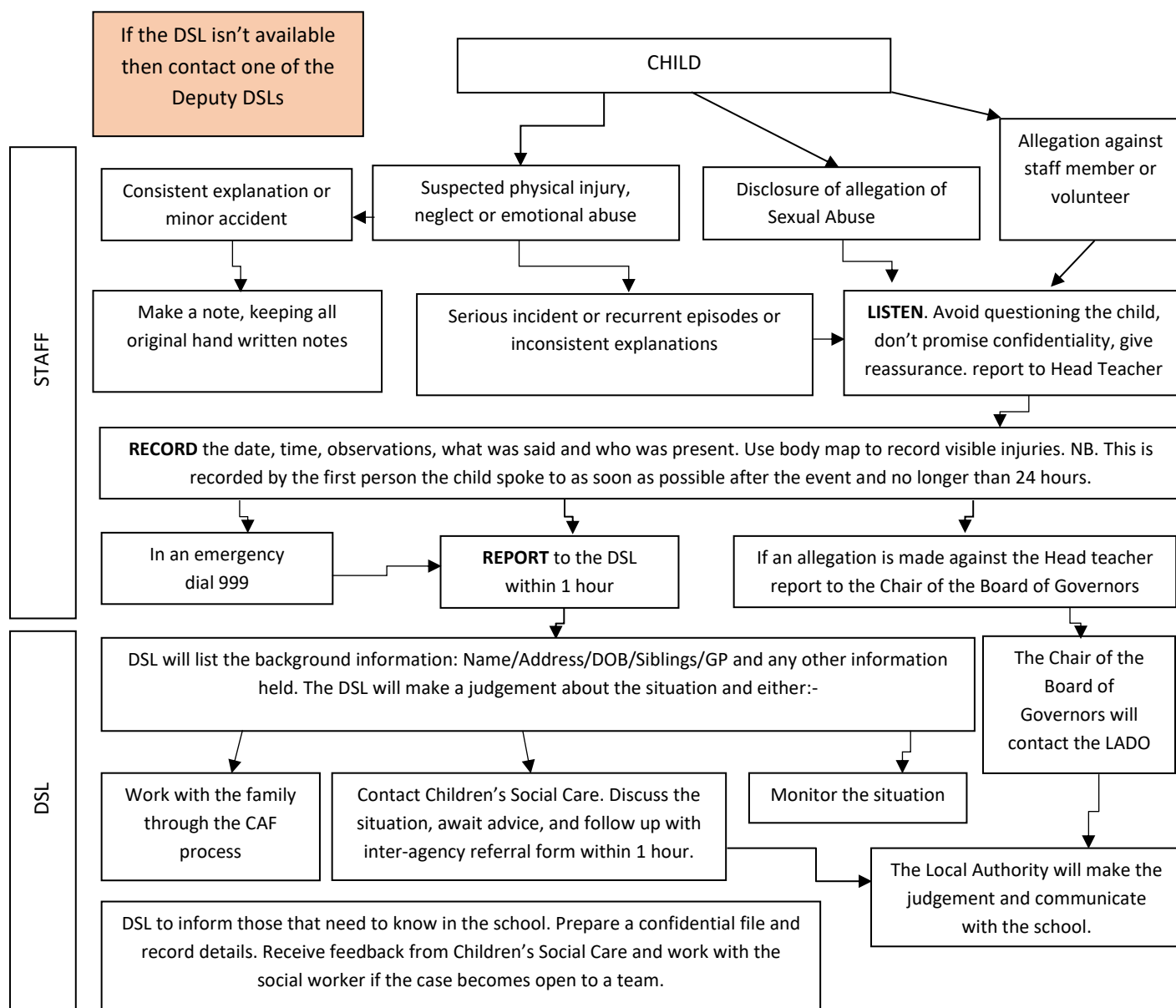
QUICK REFERRAL FLOW CHART

DSL – Designated Safeguarding Lead

CAF – Common Assessment framework

CSC– Hertfordshire Council **Children’s Social Care**

LADO – Local Authority Designated Officer



Communication and record keeping.

We acknowledge the importance of keeping parents informed about safeguarding matters relating to their child. Whilst we will not share certain confidential information with parents, we will keep a record of our decision and the reasons for it – (whether it is to share the information or not). If we decide to share, then we will keep a record what we have shared, with whom and for what purpose. If we decide not to share, then we will record why.

We will endeavour to keep parents updated on the progress of any investigations by contacting them on a weekly basis (excluding school holiday periods until the matter is resolved). We will also keep a written record of all conversations.

Complaints:

All complaints arising from the operation of this policy should be referred to the DSL (who will keep the Head and Governors informed). The Governors will arrange for the complaint to be investigated in accordance with the school’s complaints procedure.

Key Contacts

HCC (Children’s Service), 228 Hatfield Rd, St Albans AL1 4LW

Tel: 03001234043

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MASH (Multi- Agency Safeguarding Hub)

Tel: 01438737511

OFSTED Piccadilly Gate, Store Street, Manchester, M1 2WD

Tel: 03001234234 Email:

enquiries@ofsted.gov.uk

Web: www.ofsted.gov.uk

INDEPENDENT SCHOOLS INSPECTORATE CAP House, 9-12 Long Lane London, EC1A 9HA Tel: 0207 600 0100

Email: info@isi.net

Website: www.isi.net

DISCLOSURE AND BARRING SERVICE (DBS) Address for referrals: PO Box 181, Darlington, DL1 9FA

Telephone for referrals: 01325 953 795 Telephone for customer services: 0870 909 08 Email:

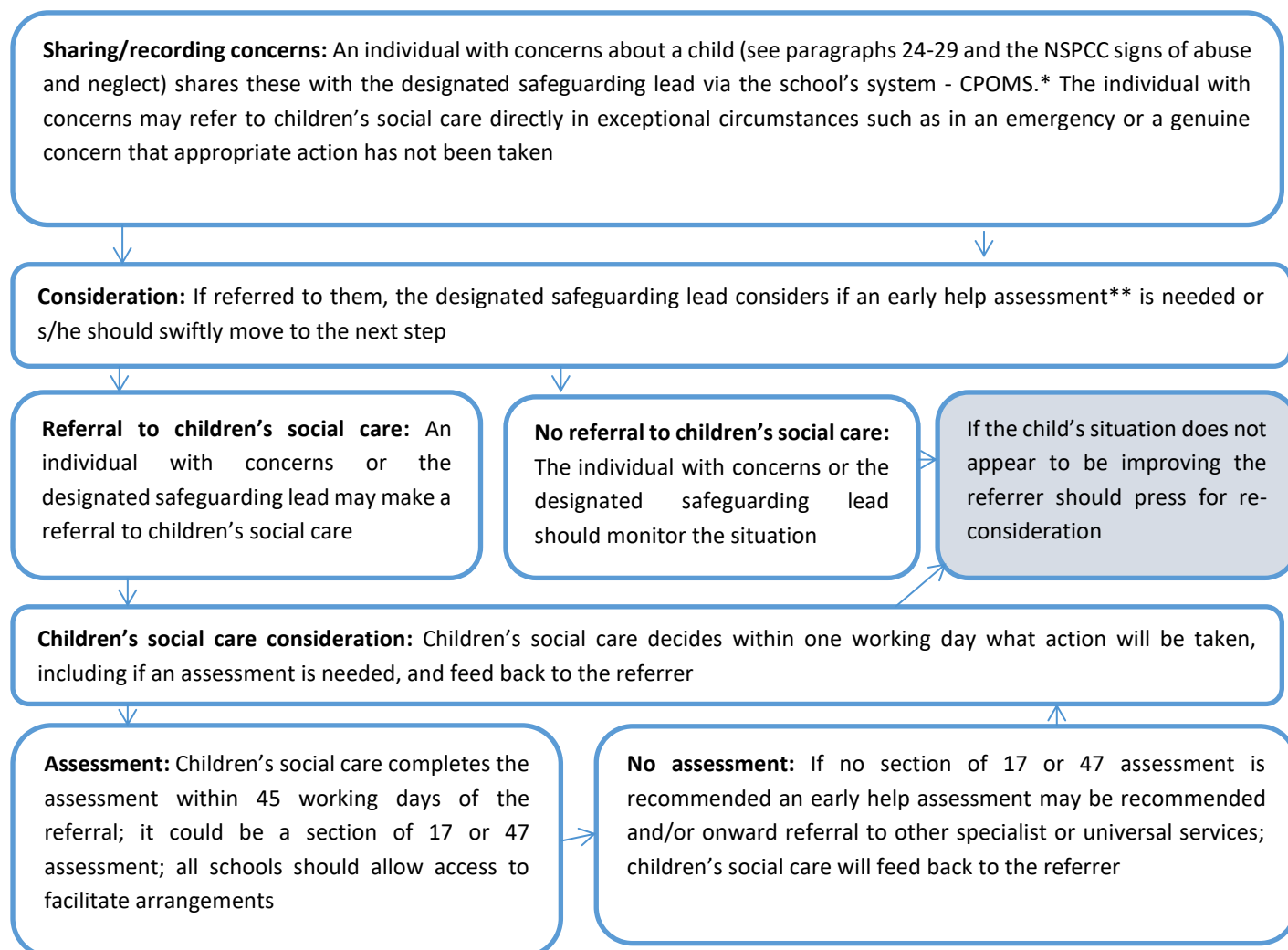
customerservices@dbi.gsi.gov.uk

NSPCC Child Protection Helpline: 0808 800 5000 **CHILDLINE:** Tel: 0800 1111

www.childline.org.uk

Action when a child has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of serious harm to a child a referral should be made to children's social care immediately.



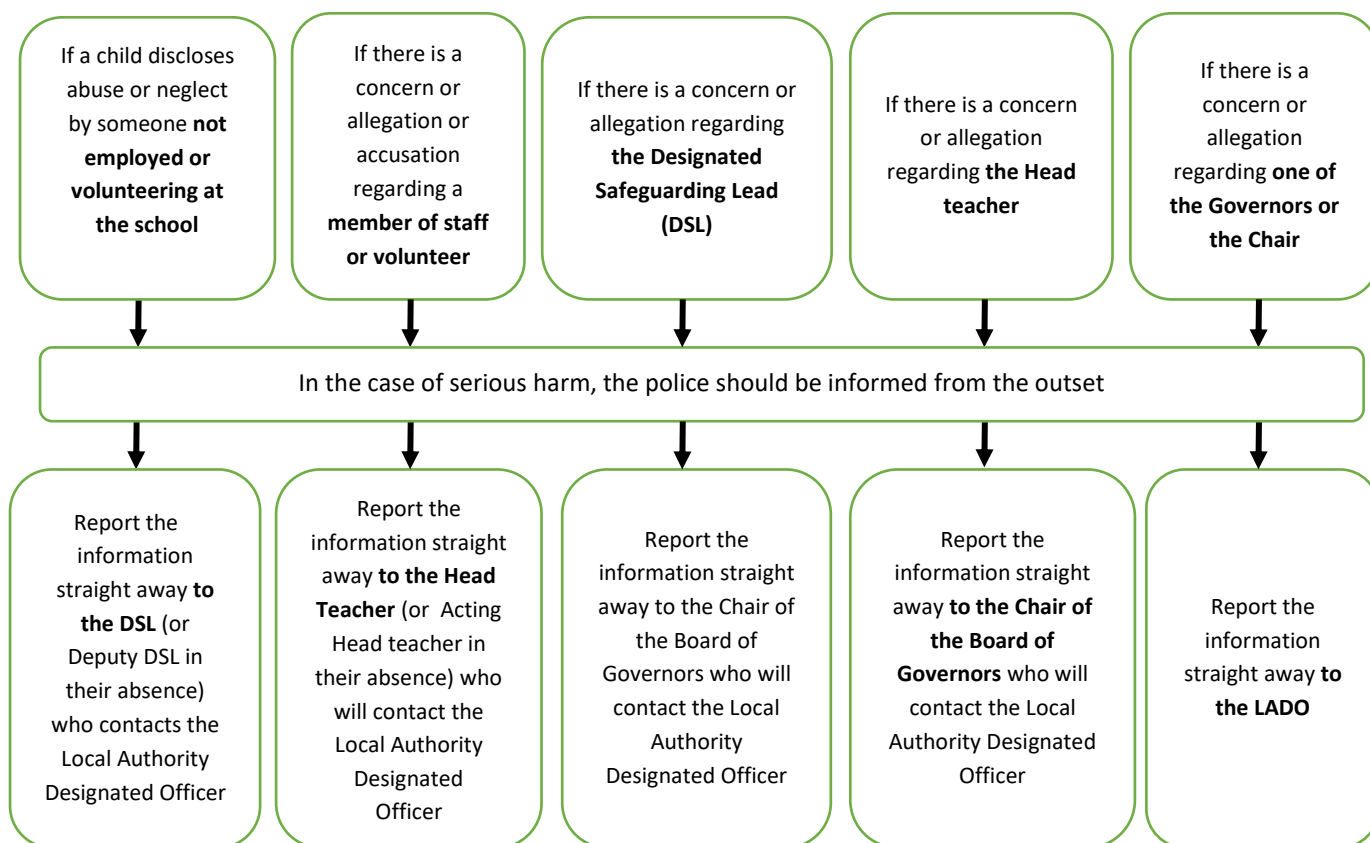
*In cases which also involve an allegation of abuse against the staff member see part four of this guidance which explains action the school or college should take in respect to the staff member.

** Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police) there should be an inter-agency assessment. These assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who could be a teacher, special educational needs coordinator, General Practitioner (GP), family support worker, and/or health visitor.

*** Where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (children in need). Where there are child protection concerns, local authority services may make enquiries and decide if any action must be taken under section 47 of the Children Act 1989, see [Working Together to Safeguard Children 2019](#) for more information.

Appendix A - Safeguarding concerns or allegations of abuse on a child

The following safeguarding procedures apply where you become aware a member of staff/volunteer/guest staff has, or a child discloses to you that an adult has behaved in a way that has, or may have harmed a child; possibly committed a criminal offence against or related to a child or behaved towards a child or children in a way that indicates they may pose a risk of harm to a child.



Appendix B: Allegations of abuse against staff

Section 1: The recording of 'low level' staff concerns

There is now a requirement to also address and track lower-level concerns and/or minor breaches of the code of conduct. In particular Part 4 of KCSIE. A low-level concern is any concern that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO). Examples of low-level concerns could include:

- being over friendly with children
 - Failing to report minor safeguarding matters on CPOMS in the required period of time
 - having favourites
 - taking photographs of children on their mobile phone
 - engaging with a child one-to-one in a secluded area or behind a closed door
 - using inappropriate sexualised, intimidating or offensive language.

In these circumstances, the Headteacher will investigate the matter and record details on the confidential area of CPOMS. The headteacher will not share this information with the safeguarding team but will consult interview the alleged and ensure there is correction work and/or relevant disciplinary in line with our code of conduct.

Section 2: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- 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 indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Stanborough School is committed to safeguarding and promoting the welfare of our pupils and expects all staff including volunteers and visiting staff guests to share this commitment. It is our aim that all pupils fulfil their potential.

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- o Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- o Providing an assistant to be present when the individual has contact with children
- o Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- o Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- o Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the British Union Conference.

If in doubt, the case manager will seek views from Citation or a relevant solicitors and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- o **Substantiated:** there is sufficient evidence to prove the allegation
- o **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- o **False:** there is sufficient evidence to disprove the allegation
- o **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- o **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk

to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the Chair of Governor's (if different) and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 30 working days (taking into consideration the complexity of the case).

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report or allegation is:

- o Determined to be unsubstantiated, unfounded, false or malicious, the school will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- o Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

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Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- o Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- o Include substantiated allegations, provided that the information is factual and does not include opinions

Tell job applicants about online searches

Let potential candidates know that online searches will be done as part of due diligence checks ahead of their interview.

This will help to provide reassurance to schools that they can and should be conducting online checks of potential new hires to check for any public incidents or issues that might need to be discussed ahead of a hiring. It will also help candidates to prepare to answer questions around public incidents from their history.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension

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- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
- Examples of such behaviour could include, but are not limited to:
 - Being overly friendly with children
 - Having favourites
 - Taking photographs of children on their mobile phone
 - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
 - Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

Stanborough School is committed to safeguarding and promoting the welfare of our pupils and expects all staff including volunteers and visiting staff guests to share this commitment. It is our aim that all pupils fulfil their potential.

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- o Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- o Empowering staff to share any low-level concerns
- o Empowering staff to self-refer
- o Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- o Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- o Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- o Directly to the person who raised the concern, unless it has been raised anonymously
- o To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- o Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- o Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- o Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- o The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

- o The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Keeping Children Safe in Education (DfE: September 2023) **makes it clear that anybody can make a direct referral to Children's Social Care including the LADO and other external agencies.**

Designated Safeguarding Lead (DSL): Jeanetta Liburd

Telephone: 01923673268

Email: jliburd@stanboroughpark.herts.sch.uk

Deputy DSL: Alicea Anderson

Telephone: 01923673268

Email: aanderson@stanboroughpark.herts.sch.uk

Deputy DSL: Eileen Hussey

Telephone: 01923673268

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Nominated Governor: Roger Murphy

Telephone: 01923673268

Email: rt.murphy@hotmail.co.uk

LADO: Andrea Garcia-Sangil - 03001234040

Appendix C - What to do when a child discloses abuse or neglect

Where a young person discloses abuse or neglect, the following sequence of events should be adhered

Create a safe environment

Create a safe environment by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that he/she is not to blame. Tell the child that you know how difficult it must have been to confide in you.



Listen

Listen to what the child has to say and take them seriously; reassure the child but advise that you cannot promise to keep a secret. Do not make promises you cannot keep. If there is a requirement for immediate medical intervention, assistance should be called for. Tell the child what you are going to do next after the disclosure. Depending on circumstances the child may then return to class or be offered time out of class with support from the DSL.



Talking to the child

When talking to the child, do not interview the child and keep questions to a minimum. Do not display shock or disbelief. Encourage the child to use his/her own words and do not ask leading questions, interrupt their dialogue, or make assumptions which might give particular answers. Do not repeat the disclosure over and over.



to:

Record

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. Record the child's name, address and date of birth along with details of the child's emotional state on CPOMS.



Do not take responsibility

- Only tell those people that it is necessary to inform.
- Do not try to investigate the allegation yourself.
- Immediately consult our Designated Safeguarding Lead so that any appropriate action can be taken to protect the pupil if necessary.
- The Designated Safeguarding Lead will consider the information and decide on the next steps.
- Do not approach or inform the alleged abuser.

Appendix D – A Child Protection Guide – Cue card

The document below is given to staff and volunteers to be referred to, as an A6, two-sided, crib card, which is folded to become 5cm-7.5cm.

A Child Protection Guide

We are committed to safeguarding and promoting the welfare of all at
our school

A code of good practice for staff and volunteers Designed for you to
keep with you—Carry it

This Code of Practice is intended to provide a readily accessible
reference. Promoting the principles of our Child Protection Policy

What happens if:

You suspect a child is being abused or neglected:

1. Immediately inform the Designed Safeguarding Lead (DSL).
2. Record and date any facts which are relevant to your concern and pass these onto the DSL.
3. Do not investigate the issue yourself.

A child discloses to you abuse by someone else

1. Allow the child to speak without interruptions, accepting what is said and without investigating further or asking leading questions.
2. Reassure the child that 'it is not their fault' and that they were right to tell you.
3. Record in the child's own words details of the disclosure and refer this immediately to the DSL **via CPOMS**. Do not investigate the issue yourself.

You receive an allegation about a member of staff or yourself

1. Immediately inform the Head Teacher of the allegation.
2. Record and date the details of the allegation in writing.

You must inform - You must not investigate.

Do treat everyone with respect

Do provide an example of behaviour you wish others to follow

Do plan activities which involve more than one other person being present, or at least which are within sight or hearing of others

Do respect a young person's right to personal privacy

Do provide access for young people to talk to others about any concerns they may have.

Do recognise, and allow for, the special needs of young people with disabilities and learning difficulties

Do encourage young people with disabilities and learning difficulties

Do encourage children and adults to point out attitudes and behaviour that they do not like

Do avoid inappropriate physical or verbal contact with young people

Do remember that someone else might misinterpret your actions

Do NOT Permit abusive peer activities (e.g., bullying racism or others)

Do NOT Judge or jump to conclusions about others

Do NOT show favouritism to any individual

Do NOT be drawn into attention seeking behaviour, such as crushes/tantrums

Do NOT make inappropriate remarks or gestures

Do NOT rely on a good reputation to protect you

Do NOT believe 'it could never happen to me'

Do NOT interview or meet with children in private or outside of school

Do NOT let concerns or allegations of abuse go unrecorded

Do NOT play physical contact games with young people