



# Safeguarding and Child Protection Policy

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This Safeguarding and Child Protection Policy consists of four parts. It is designed to be a reference point for all staff and volunteers and is a live document. This is a whole school policy and includes EYFS and the boarding house. This policy is published on the School website and parents are made aware of this. This Policy will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review. This policy can be made available in large print or other accessible format if required.

<p><b>Part 1: Overview of Safeguarding at St George's</b></p> <p>1.1. Safeguarding and Child Protection Principles  1.2. Glossary of acronyms  1.3. Useful contacts  1.4. Responsibility and Management of Safeguarding, including the Role of the Head of Safeguarding  1.5. Areas of particular risk for Staff and Students  1.6. Training, including what staff should know and do  1.7. Safeguarding in the Curriculum, including visiting speakers  1.8. Boarding, Chorister Chaperone and the Independent Listener  1.9. School Closures resulting in remote learning.</p>	<p><b>Part 2</b></p> <p><b>2.1. Procedures and specific safeguarding</b></p> <ul style="list-style-type: none"> <li>● Flow charts for reporting and disclosure of abuse</li> <li>● Early Help and Contextualised Safeguarding</li> <li>● Procedures for dealing with disclosures, staff concerns about a child</li> </ul> <p><b>2.2 Specific Safeguarding issues All staff Should Be Aware Of;</b>  Abuse and Neglect  Bullying including Cyber Bullying  Child Abduction and Community Safety  Child-on-Child Abuse  Child Sexual Exploitation and Child Criminal Exploitation  Domestic Abuse  Harmful Sexual Behaviour  Looked After Children  Preventing Radicalisation  Serious Violence  Sexual Violence and Sexual Abuse  So Called Honour Based Abuse (including FGM and Forced Marriage)</p> <p><b>2.3. Areas to note</b>  Court System  Elective Home Education  Family Members in Prison  Homelessness  Mental Health  Missing from Education  Private Fostering</p>
<p><b>Part 3: Staff; Concerns; External agencies</b></p> <p>3.1. Allegations and Low Level Concerns regarding staff  3.2. Concerns about Safeguarding Practices  3.3. Monitoring of Safeguarding  3.4. Review and Learning Lessons  3.5. External agencies</p>	<p><b>Part 4: Appendices</b></p> <p>4.1. Appendix A: Signs of Abuse and Neglect (RBWM)  4.2. Appendix B: Radicalisation  4.3. Appendix C: FGM  4.4. Appendix D: Online support for parents  4.5. Appendix E: Child Protection form  4.6. Appendix F: Hacketts Continuum of children and young people's sexual behaviour (Adapted from Hackett 2010)</p>

## Part 1: Overview of Safeguarding and Child Protection at St George's School

### 1.1 Principles of safeguarding and child protection

#### **Principles of safeguarding and child protection at St George's School:**

- The school's responsibility to safeguard and promote the welfare of children is of paramount importance.
- The best interests and voice of the child are at the heart of what we do.
- We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students.
- We endeavour to provide a safe and welcoming environment where children are respected and valued.
- We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.
- The procedures contained in this policy apply to all staff, volunteers and governors.

#### **Policy principles:**

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Students and staff involved in child protection issues will receive appropriate support.
- Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

#### **Policy aims:**

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice.
- To demonstrate the school's commitment with regard to child protection to students, parents and other partners.

This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

In line with the Human Rights and Equality Acts, there must not be unlawful discrimination against students because of race, sex, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics) As per the public sector equality duty, we have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Governors should ensure they have the processes in place for continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour. St George's leaders need to create the right culture and environment so that staff feel comfortable to discuss matters both within, and where appropriate outside of the workplace, (including online) which may have implications for the safeguarding of children.



This policy is written using the following documents as sources of advice:

<https://rbwmsafeguardingpartnership.org.uk>

[DfE Working together to Safeguard Children July 2018](#)

[DfE Keeping Children Safe in Education September 2023](#)

[DfE What to do if you are worried a child is being abused 2015](#)

[DfE Filtering and Monitoring standards for schools and colleges March 2023](#)

[GovUK Prevent Duty Guidance: for England and Wales July 2015](#)

[DfE Non-statutory advice - The Prevent duty: Departmental advice for Schools and childcare Providers June 2015](#)

[DfE SEND Code of Practice 0-25](#)

[DfE Supporting Pupils at School with Medical Conditions](#)

[Special Educational Needs and Disability Windsor and Maidenhead <https://www.ias-rbwm.info/>](#)

[DfE The use of social media for online radicalisation July 2015](#)

[DfE Information sharing advice for safeguarding practitioners July 2018](#)

[DfE Sexual violence and sexual harassment between children in Schools and colleges September 2021 \(now incorporated into KCSIE from 2022\)](#)

[DfE National Minimum Standards for Boarding Schools 2022](#)

[DfE Screening, Searching and Confiscation July 2022](#)

[DfE Relationship and Sex Education Guidance 2019](#)

[Farrer and Co Developing and implementing a low-level concerns policy 2022](#)

[BSA Promoting Best Practice – Learning Safeguarding Lessons from Recent Serious Case Reviews 2016](#)

[DCMS: Sharing nudes and semi-nudes: advice for education settings working with children and young people. 2020](#)

[DfE Mental Health and Behaviour in Schools 2018](#)

[GovUK Equality Act 2010](#)

[Equality and Human rights Commission](#)

[GovUK- Safeguarding for Charities and trustees](#)

[DfE Elective Home Education April 2019](#)

[Cyber security standards for schools and colleges GOV.UK](#)

[Part 3 of the schedule to the Education \(Independent School Standards\) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school](#)

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

This policy should also be read in conjunction with the following school policies:

**Anti-Bullying**

**Behaviour, Support, Sanctions and Rewards**

**Boarding Policy**

**E-Safety**

**Low Level Concerns Policy**

**Mental Health**

**Relationships and Sex Education**

**Safer Recruitment**

**Searching a Student or Students Possessions**

**SEND**

**Staff Code of Conduct**

**Staff Guide to Boarding**

**Social Media and acceptable use**

**Students' Code of Conduct**

**Visitor**

**Whistleblowing**

## **1.2. Glossary of Acronyms**

CSC	Children's Social Care
CSE/V	Child Sexual Exploitation/Violence
DBS	Disclosure and Barring Service
DfE	Department for Education
DSL	Designated Safeguarding Lead ( <i>Head of Safeguarding</i> )
DDSL	Deputy Designated Safeguarding Lead
EHH	Early Help Hub
EYFS	Early Years Foundation Stage
FGM	Female Genital Mutilation
HBA	(so called) Honour Based Abuse
KCSIE	Keeping Children Safe in Education
LADO	Local Authority Designated Officer
LGBT+	Lesbian, Gay, Bisexual, Trans+
NSPCC	National Society for the Prevention of Cruelty to Children
PSHE	Personal, Social, Health and Economic Education
RBWM	Royal Borough of Windsor and Maidenhead
RSE	Relationships, Sex Education
SEND	Special Educational Needs and Disability
SLT	Senior Leadership Team
SPA	Single Point of Access ( <i>incorporating MASH Multi Agency Safeguarding Hub</i> )

## **1.3. Important Contact Numbers**

**Royal Borough of Windsor and Maidenhead (our Local Authority)**

**Single Point of Access (SPA) and MASH**

E: [mash@achievingforchildren.org.uk](mailto:mash@achievingforchildren.org.uk) T: 01628 683150

Monday to Thursday, 8.45am to 5.15pm Friday, 8.45am to 4.45pm

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*Working hours duty team 01628 683744*

*At all other times contact the Emergency Duty Team:*

T: 01344 351999 <https://rbwmsafeguardingpartnership.org.uk/>

**LADO / Local Authority Designated Officer**

E: [lado@achievingforchildren.org.uk](mailto:lado@achievingforchildren.org.uk) T: 01628 683202

**Safeguarding Children and Young people against Radicalisation and Violent Extremism**

[https://berks.proceduresonline.com/windsor\\_maidenhead/p\\_sg\\_ch\\_extremism.html](https://berks.proceduresonline.com/windsor_maidenhead/p_sg_ch_extremism.html)

**Thames Valley Police**

T: 999 Emergency T: 101 Non-Emergency Number

[thamesvalley.police.uk](http://thamesvalley.police.uk) (online contact form)

**Police Support for families experiencing Domestic Abuse**

<https://www.operationencompass.org>

**National Information Centre on children of Offenders**

<https://www.nicco.org.uk>

National Cyber Security Centre - [NCSC.GOV.UK](http://NCSC.GOV.UK).

**DfE helpline for non-emergency advice on extremism**

T: 02073 407264 E: [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

**NSPCC**

T: 0808 800 500

*If a member of staff feels unable to raise an issue about another member of staff or that their concerns are not being addressed, the NSPCC whistleblowing helpline also offers support and advice:*

T: 0800 028 0285

E: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**DBS disclosure service**

E: [customerservices@db.gov.uk](mailto:customerservices@db.gov.uk)

DBS helpline: T: 03000 200 190

**The Forced Marriage Unit**

T: 020 7008 0151

E: [fmua@fco.gov.uk](mailto:fmua@fco.gov.uk)

**Childline T: 0800 1111**

Children's Commissioner ([www.childrenscommissioner.gov.uk](http://www.childrenscommissioner.gov.uk))

T: 0800 5280731

**Prevent: RBWM** [Andy.Aldridge@rbwm.gov.uk](mailto:Andy.Aldridge@rbwm.gov.uk) National phonenumber 0800 011 3764

or [Safeguarding.Partnership@rbwm.gov.uk](mailto:Safeguarding.Partnership@rbwm.gov.uk)



## 1.4. Responsibility and Management of Safeguarding

All staff have a responsibility to provide a safe environment in which children can learn and be prepared to identify children who may benefit from early help. Children may choose anyone to disclose to, therefore all staff (teaching and support) are appropriately trained.

To facilitate this, St George's School has a Head of Safeguarding who is the DSL and three Deputy Designated Safeguarding Leads:

- EYFS - DDSL *also Reception class teacher*
- Pre Prep (Years 1-3) - DDSL - *also Head of Pre-Prep and Deputy Head*
- Prep (years 4-6) - Head of Safeguarding and Mental Health (DSL)
- Senior Prep (years 7&8) - DDSL - *also Head of Years 7&8*

Ultimately the safeguarding responsibility lies with the Head of Safeguarding. However, to promote and support a strong safeguarding culture within the school, the safeguarding team works collaboratively to share and discuss safeguarding matters in a supportive environment, so that the whole team has working knowledge of the overall safeguarding picture at St. George's. The Head of Safeguarding also takes responsibility for online safety, in collaboration with the Head of Digital Learning. This includes a regular meeting with the IT team, to review trends, look for patterns, and check the effectiveness of the systems we use, with reference to cyber security standards for schools and colleges.

The School ensures that the Head of Safeguarding or DDSL are always available to staff during term time and that appropriate cover arrangements are made for 'out-of-hours' activities, and during school holidays. Where the school gets used by outside providers, suitability is checked, and there are safeguarding procedures in place. If there is an allegation relating to something that happened whilst an organisation or individual was using the premises for the purpose of activities, the school will follow its own safeguarding policies and procedures, including informing the LADO. The Governors should seek assurance that the activity provider has the appropriate safeguarding and child protection policies in place. The Governors should also ensure there are arrangements in place for the provider to liaise with the school on matters, as appropriate.

**The Governing Body** ensures that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This includes ensuring the school has appropriate filtering and monitoring systems in place and regularly review their effectiveness. Furthermore governing bodies should review the DfE filtering and monitoring standards, and discuss with IT staff and service providers, what more can be done to support schools. The Governing body takes a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

The **Designated Governor for Safeguarding and Child Protection** has oversight for safeguarding arrangements, but all Governors are jointly responsible, and need to ensure they facilitate a whole-school approach to safeguarding. The Head of Safeguarding keeps the Designated Governor for Safeguarding and Child Protection informed of pastoral concerns and ensures he is involved in policy making and implementation. In turn, the Designated Governor chairs the termly Safeguarding Committee and produces a termly report for the full Governing Council. All Governors will receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge in order to test and assure themselves that safeguarding policies and procedures in place at St George's are effective and support the delivery of a robust, whole school approach to safeguarding. This training will be updated regularly. The

Governors also carefully consider how they are supporting students with regard to particular protected characteristics- including disability, sex, sexual orientation, gender reassignment and race.

The School follows Safer Recruitment procedures as set out in the **Recruitment, Selection and Disclosure Policy**.

In order to cultivate a robust safeguarding culture, all staff are encouraged to speak to the Head of Safeguarding or one of the DDSLs for advice or regarding concerns, however small. Staff are empowered to support and listen to children and are secure in their safeguarding knowledge through updates and training opportunities, as well as the chance to speak to the Head of Safeguarding /DDSLs. Staff feel able to express concerns and reservations in order to ensure consistent professionalism of colleagues, without creating rancour, where it is done in good faith refer to the Schools Code of Conduct for Staff and Low Level Concerns Policy.

This robust safeguarding culture also enables children to feel valued, safe, listened to and respected. All staff should be able to reassure children that they are being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a child ever be made to feel ashamed for making a report.

The School recognises that students with SEND, and/or physical health issues as well as those who are LGBT+, or perceived to be, as well as those who may experience discrimination due to race, ethnicity, and religion, can face additional safeguarding challenges, both in relation to their vulnerability to possible abuse and neglect, and also in terms of being able to report such incidents. These students will require additional support which may take the form of support from the Social Skills group (run by the Learning Enrichment and Wellbeing teams), enhanced staff vigilance at playtimes and provision of opportunities for speaking out.

Children's safety, welfare and safeguarding is addressed throughout the curriculum, where it is delivered-more formally through PSHE, form time and as part of the whole-school culture. Records are also kept and recorded on CPOMS, where there are hard copies of concerns, these are kept in the Head of Safeguarding's office, in a locked filing cabinet, away from their main school file.

## **The Role of the Head of Safeguarding (DSL)**

### **Managing Referrals**

The Head of Safeguarding is expected to:

- Refer cases of suspected abuse to the RBWM Children's Social Care.
- Refer cases to the Channel programme when there is a radicalisation concern.
- Support staff who make referrals to the RBWM CSC or Channel Programme.
- Refer cases to the DBS as required, where a person is dismissed or has left due to risk/harm to a child.
- Refer cases as required to the Police where a crime may have been committed.

### **Working with others**

- Liaise with the Head to inform them of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and Police investigations.  
*(A Section 47 enquiry means that CSC must carry out an investigation when they have 'reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm. The aim is to decide whether any action should be taken to safeguard the child.)*

- As required liaise with other local safeguarding partners and work with other agencies
- Liaise with staff on matters of safety and safeguarding (including online and digital safety, which the Head of Safeguarding has oversight of) and when deciding whether to make a referral.
- Act as a source of support, advice, and expertise for all staff.

*The Head of Safeguarding (DSL) has a job description which is reviewed annually by the Head. The Head of Safeguarding sits on the Senior Leadership Team and reports to the Head.*

## **Undertaking Training**

As well as formal training, which is updated every two years, all of the safeguarding team refresh their knowledge at regular intervals in order to keep up with any developments relevant to their role, so they:

- Understand the assessment process and have a working knowledge of how RBWM conduct a child protection case and can contribute effectively.
- Are alert to the specific needs of those with SEND in relation to safeguarding.
- Are able to keep detailed, accurate records of concerns and referrals.
- Encourage a culture of listening to children and taking account of their wishes.
- Are alert to increased vulnerability of LGBT+ (or those perceived to be) as well as those who may experience discrimination due to race, ethnicity, and religion to safeguarding issues.

## **Raising Awareness**

- The Head of Safeguarding should ensure the School policies are known and used appropriately, and:
  - Ensure the School Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly, and work with the Governors regarding this.
  - Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the requirement of the School to do so.
- Contribute to RBWM SPA/MASH meetings if required
- Establish and maintain links with the RBWM SPA/MASH to make sure staff are aware of training opportunities and the latest local policies on safeguarding. SPA/MASH is made up of the Local Authority, Police, Health and other relevant agencies (of which School is one).
- Update the Governor responsible for Safeguarding and the Governing Council Safeguarding Committee termly on matters relating to safeguarding, both at the school and nationally.

## **Child Protection File**

Detailed and accurate child protection records are kept securely and confidentially in the Head of Safeguarding's office and securely on CPOMS, with the relevant staff only being able to access.

- Any personal or sensitive information which is kept for safeguarding purposes will be treated as 'special category personal data'. This allows the information to be shared without consent:
  - if it is not possible to gain consent
  - it cannot be reasonably expected that a practitioner gains consent or
  - if to gain consent it would place a child at risk

When children leave the School, the Head of Safeguarding must ensure their child protection file is transferred to the new School or College as soon as possible (within 5 days of the new term starting or 5 days for an in-term transfer) This is transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained. This information is always requested separate from any other information relating to the child, to ensure confidentiality.

The Head of Safeguarding will also consider if it is appropriate to share any information with the new School in advance of a child leaving to allow the new School to continue supporting victims of abuse and to have support in place when the child arrives. They may also contact the ongoing school if there are relevant pastoral or mental health concerns that it would be useful for the next school to be aware of.

RBWM is informed of any child leaving St George's at any time other than at the end of Year 6 or Year 8.

Previous schools of new students are asked for any safeguarding or pastoral information prior to the student starting. On receipt of safeguarding information about a new student, the Head of Safeguarding will ensure key staff are made aware of any needs or support required.

## 1.5. Areas of Particular risk for Staff and Students

One-to-one teaching, changing for PE, Games, Swimming, the boarding house, transporting students in a car and situations where physical restraint is necessary can make students and staff vulnerable. More detail is given in the **Staff Code of Conduct** and the **Handbook for Visiting Music Teachers**.

### One to one teaching

In situations where children are engaged in close one to one teaching, for example music lessons, LAMDA and sports, staff should ensure that they teach in a room with a glazed door panel and make sure the method of teaching is understood by students and parents. Refer to **Staff Code of Conduct**, Low Level Concerns policy and **Visiting Music Teacher Handbook** for further detail.

As set out in the **Staff Code of Conduct Policy**, staff must also ensure that their behaviour and actions do not place students or themselves at risk of harm, for example they should:

- never communicate via social media sites with a student. This includes becoming a 'friend' of a student on any social media site unless they have left secondary education or are 18 years of age (whichever comes later)
- only ever communicate electronically with a student via their school G-suite account.
- make every effort to avoid physical contact with students
- never use their own car to transport a student on their own without prior discussion with a member of the Senior Leadership Team. The Head of Safeguarding must always be informed prior to a student being transported in a staff member's vehicle.
- take all reasonable steps to make sure that their professionalism is never compromised.
- report any situation which might be misconstrued as quickly as possible to the Head of Safeguarding or one of the DDSLs. Refer to the Low-Level Concerns Policy
- Have an attitude of 'it could happen here'.
- Speak to the Head of Safeguarding or one of the DDSLs if they are unsure about identifying abuse or what to look for.
- Personal mobile phones are not used in School in the presence of Early Years Foundation Stage (EYFS) children and only School cameras (including school smartphones) are used to photograph children and these photographs must only be stored on the school network.
- Photographs will only be taken or published of those children whose parents have consented to this. Early Years staff (EYFS) regularly document the progress of all children in their care and detailed records are kept including photographic evidence of important milestones which are held electronically on School systems. A selection of these photos are hard copies in each child's **Learning Journey** which is available for parents to view.

- Students may bring mobile phones and other cellular devices to School but they must be handed into the School office at the start of the School day. More information in the **Student Code of Conduct**, **Boarding Policy** and **Mobile Phone Policy**.

## **The use of reasonable force**

There are circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children, for example when a child is in danger of physically harming another child or physically harming themselves.

Reasonable force covers the broad range of actions used by staff that involve a degree of physical contact to restrain children. Reasonable in this context means 'using no more force than is needed'. The decision on whether or not to use reasonable force to control or restrain a child relies on the professional judgement of the staff concerned and individual circumstances.

The Senior Leadership Team will monitor the use of restraint, and take appropriate action to prevent the inappropriate use of restraint, and take effective action when inappropriate restraint has been used. The Head should consider whether members of staff require any additional training and support to enable them to de-escalate potential confrontations between students, or potentially violent behaviour, to minimise the need for restraint.

Consideration is given to the needs of SEND students and where necessary individual behaviour plans are agreed with parents to reduce the occurrence of challenging behaviour and the need to use reasonable force. Should a teacher/ member of support staff need to restrain a student, the incident should be reported to the Head of Safeguarding or one of the DDSLs as soon as is practicably possible and this will be logged in the Restraint Register (held in the Head's office). In the event of a child having to be restrained, the parents will be informed as soon as possible.

## **Confiscation and Searching**

A search may play a vital role in identifying students who may benefit from early help or a referral to the RBWM children's social care services, especially items such as alcohol, weapons or stolen goods.

Only the Head or a member of staff authorised by the Head (or a Deputy Head in the Head's absence) can carry out a search. The Head can authorise individual members of staff to search for specific items, or all items set out in the school's behaviour policy. The search should be conducted with two members of staff present.

The Head oversees the school's practice of searching to ensure that a culture of safe, proportionate and appropriate searching is maintained, which safeguards the welfare of all students and staff with support from the Head of Safeguarding and DDSLs.

The Head of Safeguarding will need to consider the circumstances of the student who has been searched to assess the incident against potential wider safeguarding concerns

Should a police search be needed, there must be an appropriate adult available to support and help the student involved

[Refer to the Confiscation and Searching Policy and Behaviour Policy](#)

## **1.6. Training**

The Head of Safeguarding and DDSLs are all RBWM 'Targeted' Level Child Protection trained in accordance with RBWM locally agreed procedures, which include child protection, inter-agency working and Prevent awareness training. This is updated at least every two years and refreshed at

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regular intervals as required but at least annually. The Safeguarding team also attend conferences, training, and meetings, to stay abreast of safeguarding developments.

All staff (including Governors and support staff) are trained in RBWM 'Universal' Level Child Protection every three years. In addition, all staff receive safeguarding and Child Protection updates at staff meetings, via email or bulletins as necessary.

On an annual basis, staff read and sign to confirm they understand the Safeguarding Policy and are aware of the indicators of abuse and neglect and how to respond to disclosures of abuse. There is also regular safeguarding information shared with staff, as well as more interactive knowledge checks, and subject specific training where appropriate, and shared on a regular basis.

All staff, Governors and the Chair of the Dean & Canons Safeguarding Committee read and sign to confirm they have understood KCSIE Part 1, and any relevant additional sections updates as they occur.

The Head of Safeguarding, DDSLs, Senior Leadership Team, Pedagogical Leadership Team and the Safeguarding Governor will read the whole of the KCSIE guidance.

All new staff and volunteers are provided with induction training that includes the following School policies and documents:

- Safeguarding and Child Protection Policy
- Behaviour Support and Sanctions Policy
- Staff Code of Conduct
- Staff Low Level Concerns Policy
- Part 1 KCSIE and Annex B
- The role and identity of the Head of Safeguarding and DDSLs
- Online e-training after induction
- Online PREVENT training

All staff receive online training and guidance during scheduled INSET sessions, staff meetings and induction.

Staff are trained in how to manage a report of a serious concern, including child on child sexual violence and/or sexual harassment. This is in line with our procedures for receiving a disclosure.

Records of staff training are kept electronically by the Head's EA.

## **What staff should know and do for good safeguarding**

The Teachers' Standards 2021 state that teachers, including Head Teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. All teachers should manage behaviour effectively to ensure a good and safe educational environment and have a clear understanding of the needs of all students, including those with mental health needs. This is achieved by following the School's **Behaviour, Support and Sanction Policy**, which is reviewed annually.

All staff have a responsibility to provide a safe environment in which children can learn and recognise the importance of acting upon early signs of abuse so that children receive early help. Their approach must be child-centred and consider at all times what is in the best interest of the child.

If there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately.

The Head of Safeguarding and DDSLs will have the most complete safeguarding picture and are the most appropriate to advise on the response to safeguarding concerns.

All concerns should be recorded in writing.—These can be filled in on CPOMS or a hard copy kept in the staffroom, school catering and the front office.

Completed forms should be given to the Head of Safeguarding. They will be acted upon and stored securely in the Head of Safeguarding's office and on CPOMS.

## 1.7. Safeguarding and the Curriculum

Safeguarding is promoted through many areas of the curriculum, particularly PSHE. Where discussions about personal safety, consent and keeping safe help students adjust their behaviour in order to reduce risks and build resilience (including to radicalisation). It is also taught through Relationships Education (for all Primary students) and for all secondary students - Year 7 and 8, Relationships and Sex Education (RSE) and Health Education. The risk of child-on-child abuse can be minimised through work in PSHE (e.g. teaching about bullying, consent, e-safety, keeping safe) and through the good work of all staff to create a culture of safeguarding to speak out about any personal concerns knowing that they will be listened to and acted upon.

Preventative education is most effective when it is in the context of a whole school approach, and one that prepares students for life in modern Britain, and creates a culture of zero tolerance for sexism, misogyny, misandry, homophobia, biphobia and sexual violence/harassment. This is underpinned by our behaviour policy and pastoral support system, and reinforcement through our RSE and Health curriculums which are part of our PSHE curriculum. This is fully inclusive and also takes into account the needs of students with SEND, and other vulnerabilities. At age appropriate stages the curriculum will include healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality. **See RSE policy for more detail.**

A whole school culture that supports safeguarding and an open culture is also fostered, and reinforced. Children know they can speak to any member of staff and also have a physical mailbox where they can contact the Head of Safeguarding if they are not immediately available, there is also a DSL email address that can be used.

All staff should be clear as to the School's policy and procedures with regards to child-on-child abuse, and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

At St George's we understand the importance of Safeguarding awareness, our role is not just to teach it, but also to model behaviour for our students, and show that good safeguarding permeates our whole school culture.

Students are also helped to understand the risks posed by adults and young people who use the internet and social media to bully, groom, abuse or radicalise others. This includes discussion about child-on-child abuse. Students are required to sign an e-safety agreement. Staff receive offered e-safety training and as and when updates are required. This includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. E-Safety lessons are integrated into the Digital Learning curriculum. Details of parental support can be found in Appendix D, and E-Safety Policy. We share relevant E-Safety information with parents, which may be in a mailing, or a talk in school by an appropriate expert. We support parents and students new to Chrome books, with an overview of how to stay safe online, and monitoring.

### **Trips and Visits**

Risk Assessments are completed prior to all student trips and visits including those that are residential. The contact number for the Head of Safeguarding or DDSL is included content and delivery of any trip



must be checked for suitability prior to the visit or trip. If trips and visits involve supervision by staff other than employees of St George's School, their suitability will be checked with the relevant organisation.

For residential trips, consideration is given to room sharing, and students are given a choice as to who they share with. Ultimately this lies with the staff on the trip, but as far as possible, students will have at least one friend they share a room with. Prior to a residential trip, the Head of Safeguarding will discuss with staff issues that may arise from students sharing overnight accommodation, and how to act upon these.

## Visiting Speakers

The identity of a visiting speaker is verified through checking photo ID, name with company or carrying out a Google search. This information is recorded by the member of staff booking the speaker.

All visiting speakers are asked to read a summary of our Safeguarding Procedures and their responsibilities whilst in School, prior to speaking to students and sign to confirm that they have done so. Speakers are accompanied by a member of staff at all times. More information in the school **Visitor Policy**.

Suitability of material must be checked prior to their visit through the submission of an outline which is given the all clear for suitability by a member of the Senior Leadership Team (usually the Head of Pre-Prep or Head of Prep School).

## 1.8. Boarding

Arrangements are made to safeguard and promote the welfare of boarders while accommodated at St George's School in accordance with the Children's Act 1989 and the National Minimum Standards for Boarding Schools (September 2022).

The **Boarding Policy** and **Staff Guide to Boarding** should be read alongside this section.

All boarding staff receive safeguarding training specific to the boarding environment at least annually and must carry out their duties in line with this to ensure the best care and safety of all boarders. Boarding staff are alert to the potential for inappropriate student relationships and the potential for child-on-child abuse.

Boarding staff are aware that there are safeguarding risks regarding the unique nature of boarding accommodation and the risks associated with students sharing overnight accommodation, and measures that we have in place to make the environment safe: no mixed sex dorms, and staff maintaining a supervisory role which is present, and respectful of student privacy.

Staff think curiously about, and recognise the signs of children at risk of or involved in damaging relationships with others. The nature of a mixed aged boarding house, means staff need to be alert to potential relationships in which there is a power imbalance between students, which could lead to a Child-on child abusive situation, also to be alert to the extra vulnerabilities of SEND students, and where there are significantly more girls than boys, or vice versa.

Boarders are allowed mobile devices in school, see **Boarding Policy**. Measures are in place regarding online safety, and students sign a form to say they understand these. Students should only be using the school WIFI whilst at school, and in the boarding house. Students may be asked to show that they are using school WIFI, and understand that they may have their device confiscated if they are not adhering to this. Staff are also aware of the potential for students to have downloaded material, which is then present on their phone.

The Head of Safeguarding, and Head of Digital Learning work together to see that online safety is embedded within the curriculum (day and boarding students) and there is regular information and guidance shared with parents as well. See the **E-Safety Policy**. The Head of Safeguarding has overall oversight of this, including the filtering and monitoring systems the school uses, and both the Head of Safeguarding and Digital learning liaise closely with our IT providers on this.

Boarders are made aware of whom they can contact for help in school and the numbers of Childline and the Children's Commissioner are displayed in the Boarding House.

### **Independent Listener for Boarders**

The School has an independent listener that boarders can talk to should they wish to outside the School environment. Boarders are regularly introduced to the Independent Listener, who also regularly visits the Boarding community. Boarders are made aware of how to contact the Independent Listener by email or telephone.

### **Choristers**

The Choristers are the responsibility of the School whilst on the School premises or whilst on School related activities. Whilst in the Chapel or on any choir trip, the Choristers are the responsibility of staff employed by St George's Chapel, Windsor Castle and are bound by the Chapel Policy and Procedures for the Safeguarding of Children and Vulnerable Adults.

Any incident that occurs whilst Choristers are the responsibility of the Chapel will be dealt with according to the College of St. George's Policy and Procedures for the Safeguarding of Children and Vulnerable Adults. The Schools Head of Safeguarding should be informed immediately.

Choristers are taught by a number of different adults who are all DBS checked: The Director of the Chapel Music, the Assistant Director of Music, the Organ Scholar and Chorister Vocal coaches. All members of the Chapel Clergy and the Chapter Clerk are also DBS checked, see recruitment policy.

### **Chorister Chaperones**

The Chorister Chaperones (the Graduate Assistants) are employed by St George's School and as such are subject to checks as set out in the Schools Recruitment and Selection policy.

The Chorister Chaperones undertake various duties in support of the House Parents as well as taking an active role in school life. The Chorister Chaperones reports to the Houseparents in all matters relating to the Pastoral care of the Choristers. In turn, the Houseparents work closely with the Wellbeing and Pastoral leads and the Head. The Choristers are accompanied by the Chorister Chaperones at all times while they are performing their duties as Choristers. If the Chorister Chaperones are not available, another member of staff will accompany the Choristers to and from the Chapel.

## **1.9. School Closures resulting in Remote Learning**

In the event of any school closure, St George's will provide education for students remotely, including online, and care for children of critical workers and vulnerable children on site during the School term, if necessary. We aim to create a safe learning environment where children are protected from harm whilst in our physical care and as far as is reasonably possible, from exposure to inappropriate content when undertaking remote lessons. Staff are aware of the impact on mental health and wellbeing for students, parents and staff.

Risk assessments specific to remote learning and the care of key workers of vulnerable children in School are overseen and reviewed regularly by the Safeguarding Team.

The School recognises that it has no control over the home environment, but all students are taught about online safety and we provide parents with advice on keeping children safe online, appropriate workloads and how to maintain good mental health and wellbeing. As far as possible, teachers are alert to the safety and wellbeing of their students and will follow the standard procedures in terms of immediately reporting any concern to a Head of Safeguarding. Contact can be made with the Head of Safeguarding by email, phone or video call.

Children in Years 3-8 know that they can contact the Head of Safeguarding via Gmail or the School website, via a safeguarding worries button. Students in Pre-Prep are able to make contact with the Head of the Pre-Prep at any time.

Guidance is given to staff around working online, creating teaching resources and video lessons.

### **Safeguarding and wellbeing concerns during remote learning**

Concerns will be followed up by the Head of Safeguarding with a conversation with parents and the child, unless it is believed that the child will be put at risk of serious harm by speaking to the parent. In this case the Head of Safeguarding will contact CSC and follow their advice. Where necessary the Head of Safeguarding will attend the site to coordinate any reported incident or concern. In the event of a Head of Safeguarding not being able to attend site, the Head or a member of SLT will take responsibility for coordinating safeguarding on site, such as managing access to child protection files, liaising with offsite Head of Safeguarding and social workers should they require access to children to make an assessment.

## Part 2

### 2.1. Procedures

If a child is in immediate danger, and you cannot speak to a DSL, you may need to make the referral yourself.

Full details on the processes below can be found in this section of the policy

#### Concern about a child?

- 1 speak to one of the safeguarding team immediately
- 2 Save any notes to CPOMS
- 3 the safeguarding team will decide the best course of action

#### A child makes a disclosure to you

- 1 speak to one of the safeguarding team immediately
- 2 Save any notes to CPOMS
- 3 the safeguarding team will decide the best course of action

## **Contextualised Safeguarding**

Students should not be seen in isolation from their environments, and this can include, but not limited to; on and offline, families, boarding environment. As a School we take into account the concept of contextualised safeguarding, and to engage with dynamics in extra familial as well as familial settings and the impact this can have on individuals. This may include not being a victim themselves, but are affected by something that may have happened to a sibling, other family member, or person they know, or having had witnessed, abuse, violence or neglect.

### **What Staff should do if they have concerns about a child**

If staff have concerns about a child (as opposed to a child being in immediate danger) they should meet and discuss these with the Head of Safeguarding or one of the DDSLs to agree a course of action as soon as possible.

This action could include contact with parents or guardians, putting support in place in School or a referral to specialist or early help services in accordance with the SPA or EHH advice.

RBWM Safeguarding Partnership should make a decision about the course of action within one working day and let the referrer know the outcome.

### **Early Help**

Any child may benefit from early help, and all School staff should be particularly alert to the potential need for early help for a child who is:

- a child who may have a disability, SEND or is LGBT+ (or perceived to be)
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need
- is a young carer;
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- 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;
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- is at risk of so called 'honour-based abuse' such as FGM or Forced Marriage
- has returned home to their family from care
- is a privately fostered child
- is persistently absent from education, including persistent absences as part of the School day

Staff aim to identify children who may benefit from early help through discussions with one of the Safeguarding team, with the aim of providing appropriate help and prevent concerns escalating. Staff may be required to support other agencies and professionals in an early help assessment and to liaise with our local authority, RBWM, via The Single Point of Access (SPA) and Early Help Hub (EHH) this is the single point of contact for all safeguarding and wellbeing concerns regarding children and young people in The Royal Borough of Windsor and Maidenhead (RBWM).

## What to do if a child is in Danger or immediate risk of harm

A child who is in immediate danger or is at risk of harm should be reported to RBWM - SPA/MASH and/or the Police **immediately** by one of the Safeguarding team,

If it is considered that a child is likely to suffer significant harm, an inter-agency assessment by RBWM Multi Agency Safeguarding Arrangements should be carried out, using the SPA and Early Help Hub

## Procedures for dealing with disclosures

If a child makes a disclosure of abuse or neglect to a member of staff:

- If possible, manage a report with two members of staff present (one being the Head of Safeguarding or DDSL)
- Staff taking a report should never promise confidentiality, as it is very likely that it will be in the best interest of the victim to seek advice and guidance from the Head of Safeguarding and Head initially, and to speak to the appropriate agencies.
- Prioritise this disclosure and give time to the child. This will be more important than any other commitment, but arrangements should be made to ensure that other students are not then put at risk.
- Listen carefully to and believe what the child is saying and take it seriously. Listen to the views of the child, reflecting back, using the child's language, being non-judgmental, not asking leading questions, and only prompting where necessary with open questions.
- Reassure the child who has made the disclosure to you that they have done the right thing and assure them that you believe them.
- Record what has been said as soon as possible after the conversation and contact the Head of Safeguarding or one of the DDSLs who will ensure that the Referral and Assessment team are notified within 24 hours. However, anyone can make a referral.
- DO NOT confront the abuser.
- Recognise that the child has placed you in a position of trust.
- Staff have a duty to share information with necessary parties quickly and challenge where they perceive action has not been taken.

It is best practice to wait until the end of the discussion with the child and immediately write up a thorough summary. If a second member of staff is present, it may be possible to make notes. However, it is important to remain engaged with the child and not be distracted. Either way it is ESSENTIAL a written record is made.

It may be that the victim asks not to tell anyone about sexual violence or sexual harassment, If the victim doesn't consent, advice should be sought from the Head of Safeguarding who will consider the following (in discussion with the Safeguarding team and/or Head).

- Parents or carers should normally be informed (unless this puts the victim at greater risk)
- Basic safeguarding principle - if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to RBWM SPA.
- Rape, assault by penetration and sexual assaults are crimes. When a report of this kind is made, this is referred to the police. The age of criminal responsibility is ten, if the alleged perpetrator is under ten, it is still referred to the police. The police will take a welfare, rather than a criminal justice approach in these cases.
- Ultimately the Head of Safeguarding and their team will have to balance the victim's wishes against the duty to protect the victim, and other children. If a report is made, against the victim's wishes, this will need to be handled extremely carefully, clear reasoning explained to the victim, and appropriate, specialist support offered.

- If there is an online element to the disclosure, it is very important staff DO NOT view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve evidence, and hand to the police for evidence. Refer to: **Sharing nudes and semi-nudes: advice for education settings working with children and young people** for further advice.

## Record Keeping

All concerns, discussion and decisions made and the reasons for those decisions should be recorded in writing. Ensure that information you have remains confidential and is only shared with people who need to know.

Any notes taken should be passed to the Head of Safeguarding who will ensure that appropriate action is taken and that they are stored securely in the Head of Safeguarding's office, a copy will also be securely kept on CPOMS. Records should include a clear and comprehensive summary of the concern. Details of how the concern was followed up and resolved and a note of any action taken. Decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the Head of Safeguarding or one of the DDSLs.

## Referral Guidelines

If a referral to children's social care is appropriate, in the first instance staff should discuss this with the Head of Safeguarding or one of the DDSLs who in most instances would make any referral. However, this does not, and should not stop school taking immediate action to safeguard children where needed.

The Head of Safeguarding must make a referral to RBWM SPA within 24 hours of the recognition of risk if there are signs that a child:

- Is experiencing or may already have experienced abuse or neglect
- Is likely to suffer significant harm in the future

Full local procedures can be found on the [RBWM Safeguarding Partnership website](#). All staff have a reporting prompt on the back of their lanyards.

The safety of children is paramount in all decisions in relation to the welfare of children, and members of the School staff should take all reasonable steps to offer a child immediate protection from harm. As a matter of effective safeguarding practice, the school should do all that it reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. This includes considering, based on the nature of the incident, which staff should know about the report and any support put in place for the students involved.

As a school the potential impact of social media on children facilitating the spreading of rumours and exposing a victim's identity, should be considered.

Sensitive and personal information is kept separately from a child's main file, and only accessed by those who need to see it (usually the Safeguarding Team and Head).

As outlined in this document, information regarding any safeguarding issues or pastoral concerns is shared with the school a student moves onto. These are only shared with relevant staff, and if appropriate, stored confidentially. Receipt of receiving such files is requested.

The Data Protection Act 2018 and UK GDPR does not prevent sharing of information for the purposes of keeping children safe. **Working together to safeguard children** has further information on this.

## 2.2. Specific Safeguarding Issues

### Abuse and Neglect

All staff should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that staff are able to identify cases of children who maybe in need of help or protection.

If staff are unsure, they should always speak to the Head of Safeguarding or one of the DDSLs. In exceptional circumstances, such as in emergency, staff members can speak directly to RBWM Safeguarding Partnership via the SPA/MASH.

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family (or in an institutional or community setting by those known to them) or by others (e.g. via the internet). Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines. They may be abused by an adult or adults or another child or children. Abuse may take place wholly online. It may also occur to and from school, or on public transport.

For guidance on possible signs of abuse refer to RBWM guidelines, found in Appendix A.

### Bullying including Cyber Bullying

Concerns and reports of bullying are taken seriously and acted upon. Bullying is treated as a child protection concern, if the child is suffering or likely to suffer significant harm. This may need to be reported to SPA/MASH. Records are kept of incidents in order to evaluate the effectiveness of our approach.

It should be noted, that unlike our day students, boarders who are being bullied (off line) cannot escape their bullies for long periods of time as they are not going home as often, if the alleged perpetrator is another boarder, this needs to be dealt with sensitively, on a case by case basis.

Boarders are, as far as possible, encouraged to have friends outside of the boarding house, as well as those they board with.

Refer to [Anti-Bullying Policy](#) for procedures for dealing with incidents of bullying.

### Online Safety

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In many cases abuse will take place concurrently via online channels and in daily life.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. Further detail on our online safety and learning can be found in the [E-safety policy](#). It is essential children are safeguarded from potentially harmful and inappropriate online material, and they are empowered to recognise and report themselves.



The four areas online risk can be categorised as follows:

- Content- being exposed to illegal, inappropriate, or harmful content
- Contact- being subjected to harmful interaction with others
- Conduct- personal online behaviour
- Commerce - risks such as online gambling and inappropriate advertising

Policies on Mobile Phone usage at School (including Boarding) as well as E-Safety are also available. Suitable filters are in place on School-based devices and alerts for inappropriate language or behaviour are flagged and followed up by the Head of Safeguarding and Head of Digital Learning. All staff are trained in online safety, and are aware of their responsibilities in terms of filtering and monitoring.

Students are helped to understand the risks posed by adults and young people who use the internet and social media to bully, groom, abuse or radicalise others. This includes discussion about child-on-child abuse. Students are required to sign an e-safety agreement. Parents are offered e-safety support and as and when updates are required. These lessons for students are integrated into the Digital learning curriculum.

Secure filters are installed on our IT system preventing access to certain sites, or flagging up inappropriate language. These are updated regularly. If a student attempts to access a restricted site, or type something inappropriate, a notification is sent to the Head of-Digital Learning and the Head of Safeguarding. This would prompt a discussion with the student concerned and the Head of Safeguarding before deciding what action is necessary. More information in the **E-safety** and **Social Media Policy**.

This is logged under Impero on CPOMS, the Head of Digital learning and Head of Safeguarding, along with IT support, review trends, patterns, and assess if what we have in place is appropriate, and if there is a need for further training and support, for staff and students, Appendix E contains links for parents regarding online safety.

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. Concerns about a Student and cybercrime, should be reported to the Head of Safeguarding, who will consult with Cyber Choices, who work nationwide with the police to intervene and support students at risk.

### **Child-on-Child Abuse - Allegations of Abuse against Other Children**

All staff need to be aware that children can abuse other children (child-on-child abuse). This can happen both inside and outside of School and online. It is important that all staff recognise the indicators and signs of child-on-child abuse. *Although the issue can affect people of any gender, evidence shows that girls are more likely to be the victim of sexual violence and sexual harassment and that boys are more likely to be the instigator.* Students with SEND are three times more likely to be abused by their peers. There can be additional safeguarding issues, these may be online or face to face. At St. George's we employ our professional curiosity to all students' change in behaviour, mood or injury, with SEND students, we are aware of extra barriers in potentially recognising these signs, and look beyond a student's condition. Staff are supported in this, with training and support from the learning enrichment team. Any reports of abuse involving SEND students will have close liaison between the safeguarding and learning enrichment teams. Further information can be found in the SEND code of Practice 0-25 years and Supporting Pupils at School With Medical Conditions further specialist local support is available from IAS which provides local advice and support for parents and carers.

However, other children can be particularly vulnerable, including children who are, or are perceived to be, LGBT+ Being LGBT+ is not in itself a risk factor for harm, however LGBT+ students (or those perceived to be) can be targeted by other children. It is vital that LGBT+ children feel able to speak to a trusted adult. The Wellbeing Hub is a safe space in school, where all students regardless of ethnicity, sexual orientation, disability or other additional challenges are welcomed, and is a non-judgemental space, for them to seek support. The RSE curriculum supports inclusivity in language and the presentation of all relationships and family groups.

Child on Child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber bullying) prejudiced-based and discriminatory bullying
- Abuse in intimate personal relationships between peers (teenage relationship abuse)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent (such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party)
- Up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the impacted student humiliation distress or alarm
- Sharing self-generated indecent images (this includes consensual and non-consensual). Sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Children need to know that it is illegal to share these images. If it's non-consensual, it's illegal **and** abusive. It is also important for students to understand that the law is in place to protect children and young people, rather than criminalise them
- Initiation/hazing type violence and rituals which could include activities involving harassment, abuse or humiliation used to initiate a person into a group (this may include an online element).

All staff understand that even if there are no explicit reports, it does NOT mean "*it isn't happening at St George's*", and as such, staff **must** report concerns and be proactive in challenging inappropriate behaviours between students

Downplaying certain behaviours e. g. dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up', or 'boys being boys', can lead to a culture of unacceptable behaviours, and an unsafe environment for children, and, in worse case scenarios, a culture that normalises abuse, leading children to not coming forward to report it.

Students should never be made to feel ashamed for making a report, and victims are reassured that they are being taken seriously. Abuse that occurs online or outside school is not downplayed, and will still be treated seriously.

Staff are made aware of types of child-on-child abuse in staff meetings and through electronic communications though the year.

We have a zero tolerance approach to sexual violence and sexual harassment, and it is never acceptable. Any concerns or allegations of child-on-child abuse will be reported to and discussed with the Head of Safeguarding or DDSLs. Staff witnessing or receiving an allegation need to make notes and pass these to the Head of Safeguarding who will store them securely in the Head of Safeguarding's office, separate to the child's educational file, and securely on CPOMS.

The Safeguarding team will consider the context in which such incidents occur, and should a referral be necessary, this information will be shared with RBWM CSC

All accusations will be investigated using the **Behaviour Support and Sanctions Policy** or the **Anti-Bullying Policy**:

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can and should occur at the same time, if necessary. Support (and sanctions) should be considered on a case by case basis. It is important that the alleged instigators (s) is (are) also given correct support to stop them reoffending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Contexts which need to be taken into account include:

- Age of children involved
- Developmental stages of the children
- Involuntary power imbalance between the children
- Is the alleged incident a one off, or a sustained pattern of abuse (Sexual abuse can be accompanied by other types of abuse)
- Has the sexual harassment or violence taken place within a personal relationship between the children understanding intra-familial harms and support for siblings that might be needed
- Ongoing risk to others at school
- related issues and wider context, such as links to CSE and CC

As always, the best interests of the children need to be kept at the centre of all decision making. Immediate consideration must always be the best way to support and protect the victim and alleged instigator(s) and other children who may be impacted.

Whilst the facts of the case are established and during the immediate process of liaising with CSC and the police, the alleged instigator(s) should be removed from any classes, activities, boarding environments or other areas they share with the victim(s). Support will also include students who may have witnessed or been aware of any abuse. Consideration will also be taken for children travelling to and from school, including public transport or a school minibus.

A student against whom an allegation of abuse has been made may be asked to remain at home during the continued investigation and the School's **Behaviour, Support, Sanctions and Rewards Policy** will apply.

Whilst supporting the alleged victim(s) in instances of child-on-child abuse, it is also important to recognise the age/stage and vulnerability of the alleged instigator and offer appropriate support to the student and family during a difficult time.

Victims and instigators (It should be noted these are not often clear cut, and the instigator may also be a victim as well) will be supported by staff, led by the Head of Safeguarding and the DDSLs relevant to their area of the School. This may take the form of regular meetings with a student, discussions with parents and outside agencies, recommendation for counselling or a request for early help from RBWM. Careful liaison with police and/or RBWM, should help make determinations of appropriate actions regarding disciplinary actions needed. Also important is consideration to be given to whether it is unreasonable or irrational for school to reach its own view about what has happened, whilst there is an independent investigation, looking at the same facts.

Allegations of sexual abuse by another child or children will be referred to the RBWM Children's Social Care team and the Police. A referral will always be made if there are reasonable grounds to believe that a child has suffered or is at risk of suffering significant harm. In the event of disclosures about child on child abuse, all children involved, whether instigator or victim, should be treated as being 'at risk'. The **RBWM Multi Agency Threshold for Safeguarding the Child's Journey** should be referred to.

Any action will be made with the best interest of all children involved and with consideration to the

child's wishes and feelings. All decisions regarding the course of action, decisions made and why, will be recorded and stored securely in the wellbeing office and CPOMS

A clear **Behaviour, Support, Sanctions and Rewards policy** alongside appropriate supervision at break times allows staff to respond to issues fairly and quickly. Victims and instigators are given support following any incidents of child-on-child abuse.

### **Child Abduction and Community Safety**

Child abduction can be committed by parents or other family members, by people known but not related to the victim, and also by strangers.

St. George's Students, with parental permission, can walk to and from school. The Year 7s and 8 boarders have parental permission to attend town, on a Wednesday afternoon. Personal safety with boarders is discussed with the Houseparents, prior to visiting town, the boarders also have the Houseparents school phone contact, should there be an issue in town.

For after school collection of day students, parents will inform the office/class teacher if a different adult is collecting their child.

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

Child Sexual Exploitation and Child Criminal Exploitation involves exploitative situations, contexts and relationships where young people receive something as a result of engaging in sexual or criminal activities. It can also form part of modern slavery.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Concerns regarding Child Sexual or Criminal Exploitation should be discussed with the Head of Safeguarding or one of the DDSLs who will contact CSC. This may include concerns around County lines, where children can be exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance.

Possible signs of Child Sexual and Criminal Exploitation

- Children who appear with unexplained gifts or a new possession
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or don't take part in education

CSE can occur over time or as a one-off occurrence, and may happen without the child's immediate knowledge (e.g. through others sharing videos with them on social media). Some children may not realise they are being exploited (e.g. they believe they are in a genuine romantic relationship).

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

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## Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of Domestic Abuse on children, as victims in their own right. Children may see, hear, or experience the effects of abuse at home. All of which can have a detrimental and long term impact on their health, wellbeing, development, and ability to learn.

Young people can also suffer domestic abuse in their own intimate relationships. (teenage relationship abuse) Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). As with any child under 18, our child safeguarding procedures and policies will be followed.

Operation Encompass operates in all police forces across England, and helps police and schools work together to provide emotional and practical help to children.

## Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection (see Appendix F).

HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context. When considering HSB, the age and the stage of development of the child(ren) are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them. The Head of Safeguarding has undergone specific HSB training.

## Looked After Children

Should there be looked after children, or previously looked after children attending St George's School, the Governing body would ensure that staff have the skill, knowledge and understanding to keep looked after children safe. The Head of Safeguarding would liaise with the child's social worker.

## Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. We recognise our duty to have due regard to the need to prevent people from being drawn into terrorism ('the **Prevent** duty') through delivering awareness of mutual respect, tolerance of different faiths and beliefs and promoting the fundamental British Values of democracy, the rule of law and individual liberty.

Staff are made aware of the **Prevent** Duty, indicators and risks through in-house training. Incel slang is finding its way into common language, via social media and the prominence of memes. Potentially St George's students could be exposed to the language and rhetoric without really realising their true meaning.

Secure filters are installed on our IT system preventing access to certain sites. These are updated regularly. If a student attempts to access a restricted site, or type something inappropriate, a notification is sent to the Head of Digital Learning and the Head of Safeguarding. This would prompt a discussion

with the student concerned and the Head of Safeguarding before deciding what action is necessary. More information in the **E-safety** and **Social Media Policy**.

This is logged under Impero on CPOMS. The Head of Digital learning and Head of Safeguarding, along with IT support, review trends, patterns, and assess if what the school has in place is appropriate, and if there is a need for further training and support, for staff and students,

Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately (the **Prevent** Duty 2015). For details of the possible signs of radicalisation, **see Appendix B**

In the case of students identified at the risk of radicalisation, the child will be referred to CSC, Channel or the RBWM Prevent Lead. Channel is a programme which provides support at an early stage to those identified as being at risk. The member of staff referring to Channel may be asked to attend a Channel panel to discuss the individual, depending on the level of risk. The decision to seek support would normally be taken with the parent and student, but no consent is necessary if the child is believed to be at risk of significant harm; in this case a referral would be made to CSC, the Police and RBWM, normally by the Head of Safeguarding or one of the DDL s although *anyone* can make a referral.

## **Serious Violence**

All staff need to be aware of indicators which may signal that children are at risk from or involved with serious violent crime

These may include:

- Increased absence from school
- Change in friendships or relationships with older individuals
- Decline in performance
- Signs of self-harm or change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery, or County lines.

## **Sexual Violence, Sexual Assault and Sexual Harassment**

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 - Rape, assault by penetration and sexual assault. Sexual harassment refers to unwanted conducts of a sexual nature both online and off line. Being subjected to harassment, violence and or abuse, including that of a sexual nature may also breach The Human Right Act 1998. Further information (including on absolute and qualified rights) can be found at [equalityhumanrights.com](http://equalityhumanrights.com)

As a school we have a zero tolerance approach to sexual violence and sexual harassment, it is never acceptable and is not tolerated.

Staff must take reports seriously, not promise confidentiality, record the report and inform the Head of Safeguarding or one of the DDSLs. Procedures for dealing with a safeguarding concern will be followed. Victims will be supported and reassured that they are being taken seriously and will be kept safe. It is important to note that children may not find it easy to tell staff about their abuse verbally and can show signs or act in ways that they hope adults will notice and react to.

Students are taught about consent and healthy relationships primarily through PSHE, assemblies and form time.

### **So called 'Honour Based Abuse' and Violence (including FGM and Forced Marriage)**

So called HBA encompasses crimes which have been committed to protect or defend the honour of the family and or the community, including Female Genital Mutilation, forced marriage and practices such as breast ironing.

All forms of so-called HBA should be referred to RBWM, CSC and the Police. If in any doubt staff should speak to the Head of Safeguarding or one of the DDSLs.

Any concerns for a student who is about to or has undergone FGM will be discussed with the Head of Safeguarding or one of the DDSLs. CSC and the Police will be involved. We recognise that there is a specific legal duty on teachers to report to the Police if they discover that an act of FGM has been carried out on a girl under the age of 18 and this must be done personally. **See Appendix C**

### **Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to coerce a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff should discuss concerns with the Head of Safeguarding or one of the DDSLs.

### **2.3. Areas to note**

Whilst all children should be protected, it is important that the governors recognise that some groups of children are potentially at greater risk of harm than others, (both online and offline) and therefore oversee school policies and procedures to ensure this is observed. Some of these more vulnerable groups are highlighted below.

### **Court System**

Children are sometimes required to give evidence in criminal court, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful and upsetting for children.

Court representatives may need to speak to the child in school, which we facilitate and work with external agencies, to support the student.

### **Elective Home Education**

Where a parent/carer has expressed their intention to remove a child from School with a view to educating at home, it is recommended professionals work together with parents. Ideally this would be *before* a final decision has been made to ensure parents/carers have considered what is in the best interests of each child. It is important to note that Home Educated children are not more likely to be abused, or a Safeguarding issue will arise, but can 'fall off the radar' if a child is being withdrawn from formal education. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

## **Family Members in Prison**

Children who have a family member in prison can be at risk from poverty, stigma, isolation and poor mental health. This is potentially a highly sensitive issue for families, and support from the National Information Centre on Children of Offenders, would be sought, to help mitigate negative consequences for these children.

## **Homelessness**

Indicators that families may be at risk from Homelessness include; debt, rent arrears, domestic abuse and antisocial behaviour. Discussions with local housing need to be progressed as appropriate, however this should not replace a referral to RBWM, if there is a concern a child might or has suffered harm, a result of homelessness, or potential homelessness.

## **Mental Health**

All staff are 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. Schools have an important role to play in supporting the mental health and wellbeing of students, and to help them be resilient and mentally healthy. Education staff are well placed to observe children day to day and identify those whose behaviour suggests that they might be experiencing a mental health problem, or at risk of developing one.

Concerns around a child's mental health must be reported to the Head of Safeguarding (who is also the Head of Mental Health) and a plan for appropriate action will be made, in consultation with the Head of Learning Enrichment and other relevant parties

Good mental health care will also be addressed within PSHE and be part of a whole school awareness of promoting wellbeing and care. The Head of Safeguarding is responsible for leading Mental Health provision. Further information is found in the [Mental Health Policy](#).

## **Missing from Education**

All students are placed on the School admission register and daily attendance registers. The RBWM are notified of the destination of any student who is removed from the admissions register at standard and non-standard times and if their destination is unknown, school holds at least two contact numbers per child.

Students' absences are monitored via electronic registration by Form Tutors/Class Teachers. Absence is initially followed up with parents by the Form Tutor/Class Teacher to establish reasons and ascertain whether support is needed. The Head of Pre-Prep and the Head of Prep are kept informed of longer term or repeated absences. These are investigated with parents and the Head is informed.

Any unauthorised absence will be followed up immediately and the Head of Safeguarding /DDSL informed. The Head of Safeguarding will check attendance registers on a monthly basis.

The RBWM will be informed of any extended unauthorised absence or a child leaving at any time other than the end of Year 6 or 8.

We alert RBWM of students joining the school at non-standard times, and within five days of them starting.

A child going missing from education can act as a vital warning sign of a range of safeguarding possibilities.



It is essential that all staff 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 abuse and neglect, travelling to conflict zones, FGM and forced marriage. Early intervention is therefore essential to identify the existence of any underlying safeguarding risks and to help prevent the risks of a child going missing in future.

## **Private Fostering**

Private fostering is defined as where a child under the age of 16 is provided with care and accommodation by someone to whom they are not related in that person's home. The School does not arrange private fostering for students and does not have any students who are currently privately fostered. If staff become aware that a student may be in a private fostering arrangement, they should raise this with the Head of Safeguarding or one of the DDSLs who will notify the RBWM, who will check that the arrangement is suitable and safe for the child.

## PART 3

### 3.1. Low level Concerns

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately is critical.

Concerns about safeguarding- however small must be reported to the Head

Examples of such behaviour could include, but are not limited to:

- being over 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
- Humiliating students

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, to behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation, but do need to report their concerns.

#### **What are the aims of Low Level concerns reporting?**

- To ensure that staff are clear about the procedures for reporting concerning behaviour.
- To address unprofessional behaviour and support the individual to correct it at any early stage.
- To identify concerning, problematic or inappropriate behaviour, including any patterns that may need to be consulted on or referred to the local authority designated officer (LADO, on a no names basis if appropriate).
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised.
- Help identify any weak spots in the School's safeguarding system and help inform regular review of procedures.
- To create and embed a culture of trust, transparency and openness in which the clear values and expected behaviour which are set out in the Staff Code of Conduct are consistently lived, monitored and reinforced by all staff.

The Low-Level Concerns procedures enables all staff to share any concerns, no matter how small, about their own or another member of staff's behaviour with the Head.

1

The term '*low-level concern*' does not mean that it is insignificant; it means that an adult's behaviour towards a child does not meet the harm threshold but does raise a cause for concern.

Farrer & Co state that; *Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, and recorded and dealt with appropriately, is crucial. If implemented well this should encourage an open and transparent culture; enable organisations to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or behalf of the organisation are clear about professional*

*boundaries and act within them, in accordance with the ethos and values of the organisation.*

### **What is a low level concern?**

A low-level concern is when an adult's behaviour that does not meet the harm threshold but is not consistent with the standards and values of St George's and which falls below the expectations outlined in the school **Staff Code of Conduct**. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

For example, this may include, but is not an exhaustive list:

- Being over-friendly with students
- Having favourites
- Taking photographs of students on a personal device
- Engaging in one-to-one activities with children where they cannot easily be seen
- Using inappropriate language
- Humiliating students

Low-level concerns can include inappropriate conduct inside and outside of work.

### **Who can raise a low-level concern?**

Low-level concerns can be raised by staff members, parents or a child. If anyone has a concern, they should raise it in the correct way, in a timely manner.

It is also important the correct process and procedures are followed, to deal with any issues raised, to help avoid any false allegations, or misconceptions around a behaviour.

### **Self-reporting**

A staff member may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the school's Staff Code of Conduct.

2

Staff are encouraged to self-report. It is self-protective and enables a potentially difficult issue to be addressed at the earliest opportunity.

It demonstrates awareness of the expected standards and self-awareness as to one's own actions, and how these might be perceived by others.

At St George's we need to adhere to the highest standards, and a culture that enables self-reporting helps to strengthen this culture.

### **Self-reporting is a positive action**

All staff need to be informed about, and be able to identify concerning, problematic or inappropriate behaviour, and understand the importance of sharing concerns when they observe behaviour which goes against the School Code of Conduct. This is done by ensuring all staff read this policy, and attend relevant staff briefings, insets and any training as required.

The Low-Level Concerns policy also acts as a monitor to gauge effectiveness of training and culture. At St George's, staff are informed about identifying concerning, problematic or inappropriate behaviour, rather than think they can recognise dangerous people, they can be prepared to act when they observe behaviour which violates the Staff Code of Conduct.

Staff are also trained on specific behaviour to be aware of, and are encouraged and empowered to share any concerns about behaviour that is not appropriate. Intrinsic to this is, discussing during training real life examples of the consequences of failing to report.

It is important to note, if a member of staff has a concern, they do not have to establish if it is 'low-level' or not but to know the procedures in place in which to raise the concern in the first place.

Once staff share what they believe to be a low level concern, that determination should be made by the Head. This can be done in consultation with the Head of Safeguarding.

### **Staff Code of Conduct**

A robust Staff Code of Conduct is in place at St George's which reflects and reinforces

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this policy. There is commitment from leadership to adhere to, enforce and reinforce the Staff Code of Conduct and its expectations, and to address any attempt to bypass policies or procedures – regardless of the person in question's status.

3

Staff are asked to read and sign the Staff Code of Conduct on an annual basis, so that everyone is familiar with it and clear on the standard of behaviour expected of them – it is a live document and applies to all levels of school.

#### **How do I report a low-level concern?**

If a member of staff has a concern to raise, they should raise this in person or an email directly to the Head

(or in their absence

the Head of Safeguarding or a DDSL).

If the concern is about the Head, they should contact the Chair of Governors

The Head will make a record of this to include:

- Details of the concern
- The context in which the concern arose
- Action taken

The Head will acknowledge receipt of the concern via email

The name of the individual raising the concern should also be noted, but if they wish to remain anonymous, this should be respected as far as reasonably possible although in some circumstances, this may not be possible in the event of legal obligations.

Concerns cannot be raised anonymously, i.e., an anonymous note

The concern can also be recorded via the LLC form.

Hard copies can be located in the Staff Room, School Office, Finance and Maintenance Office and Catering Office.

The Head will discuss the concern with the individual who raised it, and will take steps to investigate if needed.

The Head will respond sensitively and in a proportionate way to any concerns raised.

They may discuss the concern with the Head of Safeguarding. If there is any doubt whatsoever, the Head must seek advice from the LADO on a no names basis. In the first instance, the LADO will act on a consultation basis.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. Should supply staff or a contractor wish to self-report an incident, they may request a paper copy of the form from the School Office or Assistant Bursar (Estates and Maintenance) which will be securely handed to the Head, or request to see the Head or Head of Safeguarding.

4

Most low-level concerns by their nature are likely to be minor and dealt with by guidance, training and support.

In most cases, a low-level concern will simply require a conversation with the individual about whom the concern was raised.

The Head will securely retain confidential files on low-level concerns. The central log of these will be shared and monitored with the SLT on a monthly basis to ensure issues are being dealt with appropriately and promptly, and that potential patterns are identified.

This review will be noted in SLT meeting minutes.

It is important that concerns when raised will be dealt with promptly and effectively, whilst on the other hand protecting staff from potential false allegations or misunderstandings. Any investigation of low-level concerns will be dealt with discreetly on a need-to-know basis.

Where a pattern of behaviour is identified in respect to an individual, the Head will consider if there are wider cultural issues at play, and whether safeguarding and relevant policies need reviewing or that training needs to be arranged for staff to reduce the risk of the same issues occurring again.

#### **How long are records kept for?**

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Low-level concerns are kept for as long as is deemed relevant for Safeguarding purposes. In most cases once a staff member leaves the school, any concerns relating to them are retained for the duration of their personnel file and will not be included in any onward reference unless it meets the threshold for LADO referral (either as an individual concern or a group of concerns).

#### **Role of the Governors**

The Head will inform Governors about the implementation of the Low-Level Concerns policy and the evidence of its effectiveness.

The Safeguarding Governor will also review an anonymised sample to ensure that concerns have been handled appropriately.

### **3.2. Whistleblowing against Staff (including Volunteers, supply staff and contractors)**

An allegation over behaviour which indicates a member of staff has behaved in a way that has harmed a child, or may have harmed a child, or possibly committed a criminal offence against or related to a child. Or behaved in a way towards a child or children that would indicate they pose a risk of harm to children. All staff and volunteers have a responsibility to report any concern or allegation about School practices or the behaviour of colleagues which is likely to put students at risk of abuse or other serious harm. Not to do so could be seen as being complicit in the abuse.

All staff are made aware of the procedures for whistleblowing and in the **Staff Code of Conduct Policy** and **Whistleblowing Policy**

If Staff members have an allegation about another staff member, a volunteer, supply staff or contractor or one of the Safeguarding team, then this should be referred to the Head (or in his absence to the Chair of Governors) who will discuss it with the LADO at RBWM

**WHERE THERE ARE CONCERNS ABOUT THE HEAD THIS SHOULD BE REFERRED TO THE CHAIR OF GOVERNORS WHO WILL DISCUSS IT WITH THE LADO WITHOUT INFORMING THE HEAD.**

If a member of staff feels unable to raise an issue or that their concerns are not being addressed, the NSPCC helpline also offers support and advice.

### 3.3. Procedures for dealing with a Low Level Concern and Allegations

In the first instance, the Head (or where the Head is the subject of an allegation, the Chair of Governors), should **immediately** discuss the allegation with the LADO to consider the nature, content and context of the allegation and agree a course of action. In cases where there is deemed to be an immediate risk to children or evidence of a criminal offence, the Police will be contacted. The Head of Safeguarding will be kept informed and will liaise as required with RBWM LADO as case manager. For a low level concern, the Head will deal with the issue as per the Low Level Concerns procedures, outlined in this policy.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken, in which case this decision and a justification for it will be recorded by the Head/Chair of Governors and the LADO.

In the case of low-level concerns, records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Should mediation or dispute resolution be necessary this will be considered by the Head. Support will be offered to staff on a case-by-case basis which could include counselling, access to legal advice or external support. If the staff member is a member of the boarding staff, and they are suspended, following a child protection investigation, alternative accommodation will be provided.

All discussions should be recorded in writing and a course of action agreed. Every effort must be made to maintain confidentiality up to the point where the accused person is charged with an offence, or the Secretary of State publishes information or a decision is reached in a disciplinary case or an investigation by the Teacher Regulation Agency (TRA).

Schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child. This will only apply to allegations, and not low level concerns, further reading on this and clarifications can be found in the Whistleblowing, and low level concerns policy.

The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or dismissal of the individual.

If any person (whether employed, contracted, a volunteer or student) is dismissed, resigns or is removed due to safeguarding concerns, before a disciplinary process is completed the Head must inform the person about the employer's statutory duty to report the case to the Disclosure and Barring Service. Not to do so would constitute an offence and the School could be removed from the DfE register of independent Schools.

Where a teacher has been dismissed or the employer ceases to use the teacher's services, or the teacher resigns or otherwise ceases to provide his or her services, due to professional misconduct, the Head will discuss the case with the LADO as it must be considered by the school whether to make a referral to the Secretary of State (via the TRA) to consider prohibiting the individual from teaching due to conduct that may bring the profession into disrepute or that they have received a conviction at any time for a relevant offence.

The Head should similarly inform the person concerned about the employer's statutory duty to report the case as above. Where an allegation has been proved false, unsubstantiated or malicious this should not be included in a reference.

The SLT and Head of Safeguarding welcome discussion with staff and any concerns will be taken seriously. Concerns can also be raised with the Staff Governor, Canon Martin Poll.

The NSPCC also operate a whistleblowing helpline for staff who do not feel able to raise concerns internally.

### **3.4. Monitoring and Reviewing Safeguarding**

The Head, the Designated Governor and the Head of Safeguarding will monitor the operation of this Policy and the effectiveness of its procedures.

A termly report on Safeguarding and Child Protection will be made to the Governing Council via the Safeguarding Committee Meeting (minutes of which are shared with all Governors) and the Safeguarding Governor provides a verbal report at the termly meeting of Full Council).

In addition, any deficiency that is noted in the School's Safeguarding and Child Protection arrangements will be remedied without delay. The Head, Head of Safeguarding and DDSL s review the policy regularly and as necessary. The Governing Council will undertake an annual review of this Policy and the efficiency with which the related duties have been discharged.

Where an investigation has occurred, the Head of Safeguarding will immediately review the School's safeguarding procedures and prepare a report for the Governors. Where a substantial allegation has been found, the Head of Safeguarding should consult with the LADO on the efficiency of the School's procedures or practice (including disciplinary action taken) to ensure the best possible safeguarding of children in the future.

Whether or not the School decides to refer a particular complaint to CSC or the Police, the parents and student will be informed in writing of their right to make their own complaint or referral to the Social Services Department or the Child Protection Unit of the Police and will be provided with contact names, addresses and telephone numbers, as appropriate.



## Part 4: Appendices

### 4.1. Appendix A: Signs of abuse and neglect (from RBWM)

All staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

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.

#### Signs of Physical Abuse

Physical abuse may result in the symptoms described below. Aside from direct physical contact, physical abuse can also be caused when a parent or caregiver feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. Signs of physical abuse include:

- Bruises on legs before a child is mobile
- Black eyes without bruising to the forehead
- Fingertip bruising and bruises in various stages of healing
- Cigarette type burns anywhere, patterned burns (irons), rope burns. Contact burns in abnormal sites.
- Lacerations to the body or mouth
- Multiple fractures. Evidence of old fractures. Any fractures to children under two years old
- Fading injuries noticeable after an absence from School
- Seems frightened of parents, does not want to return home at the end of the day
- Shrinks markedly (backs away) at the approach of adults
- Suffers from frozen watchfulness
- Constantly asks in words/actions what will happen next

#### Signs of Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may also include non-contact activities, such as involving the children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways. Signs of sexual abuse displayed by children include:

- Difficulty walking or sitting
- Pain/itching/bleeding/bruising/discharge to the genital area/anus
- Urinary infections/sexually transmitted diseases
- Persistent sore throats
- Eating disorders
- Self-mutilation
- Refuses to change for gym or participate in physical activities
- Exhibits an inappropriate sexual knowledge for their age
- Exhibits sexualised behaviour in their play or with other children
- Lack of peer relationships, sleep disturbances, acute anxiety/fear
- School refusal, running away from home

#### Signs of Emotional Abuse

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Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's development. It may involve conveying to children that they are worthless or unloved, inadequate or valued insofar as they meet the needs of another person. It may feature inappropriate expectations being imposed on children, relative to their actual development or age. Signs of emotional abuse displayed by children include:

- Excessive behaviour, such as extreme aggression, passivity or become overly demanding
- Children who self-harm, for instance by scratching or cutting themselves
- Is either inappropriately adult or infantile
- Children who persistently run away from home
- Children who show high levels of anxiety, unhappiness or withdrawal

### **Signs of Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. This is likely to result in the serious impairment of the child's health or development. Signs of neglect include:

- Frequent absenteeism from School
- Begs or steals money or food
- Lacks needed medical or dental care, immunisations or glasses
- Lacks appropriate clothing, e.g. for weather conditions, shoes are too small, ill-fitted clothes
- Clothes are consistently dirty
- Teeth are dirty, hair quality is poor and contains infestations
- Hands are cold, red and swollen
- The parent or adult caregiver has failed to protect a child from physical harm or danger
- The Parent or Other Adult Caregiver:
  - Denies existence of or blames the child for the child's problems at home or at School
  - Sees and describes the child as entirely worthless, burdensome or in another negative light
  - Unrealistic expectations of the child i.e. demand a level of academic or physical performance which the child is unable to reach
  - Offers conflicting or unconvincing explanation of any injuries to the child
  - Appears indifferent to or overtly rejects the child
  - Refuses offers of help for the child's problems
  - Isolated physically/emotionally

It is important to recognise that the different types of abuse often occur simultaneously. For instance, where a child is physically abused, they often suffer emotional abuse as well. If you perceive a combination or repetition of any of the signs of child abuse then please contact the relevant social services office immediately.

## 4.2. Appendix B: Signs of Radicalisation

**Extremism:** Vocal or active opposition to British fundamental values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. *As defined in the Government's Counter terrorism strategy.*

**Radicalisation:** Refers to the process by which people come to support terrorism and extremist ideologies associated with terrorist groups. *As defined in the revised Prevent Duty Guidance for England and Wales*

**Terrorism:** is an action that endangers or causes serious violence to a person or people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use of threat **must** be designed to influence government or to intimidate the public and is made for the purposes of advancing a political, religious or ideological cause. *As defined in the Terrorism Act 2000*

Possible signs of extremism or radicalisation:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- attempts to recruit others to the group/cause/ ideology; or
- communications with others that suggest identification with a group/cause/ideology
- (HM Government Channel Duty Guidance 2015)

Radicalisation can occur through lots of different methods, such as social media or the internet, and different settings, such as being at home.

### 4.3. Appendix C: FGM (Female Genital Mutilation)

Possible signs that FGM is going to take place:

- A girl may tell other children about it
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent
- Parents seeking to withdraw their children from learning about FGM.

Signs that FGM has taken place:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from School or college.
- A prolonged absence from School or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

*(HM Government Multi Agency Guidelines: Female Genital Mutilation 2016)*

## 4.4.: Appendix D: Useful Parent and Carer Resources for Online Safety

<https://www.childnet.com/resources/parent-and-carer-toolkit/>

A toolkit to support parents and carers of any age to start discussions about online life

<https://www.common sense media.org/>

Provides independent reviews, age ratings and information for children and parents

<https://www.internetmatters.org/>

Age specific online safety checklists, guides on parental controls

<https://www.mariecollinsfoundation.org.uk/resources>

Sexual abuse online

<https://www.ltai.info/>

Advice for parents and carers to keep children safe from online radicalisation

<https://parentsafe.lgfl.net/>

Support for parents and carers to keep children safe online, including tips to keep primary aged children safe

<https://www.ceop.police.uk/Safety-Centre/>

Support for parents and carers to keep children safe

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

For parents and carers from NSPCC and O2, including a guide to social networks, apps and games

<https://parentzone.org.uk/>

Keeping children safe online

<https://www.childrenscommissioner.gov.uk/report/talking-to-your-child-about-online-sexual-harassment-a-guide-for-parents/>

This is the parents' guide from the Children's Commissioner on talking to children about online sexual harassment.

<https://support.google.com/chromebook/answer/7680868?hl=en-GB>

Useful tips if your child is having an additional account on their Chromebook

### 4.5. Appendix E: Child Protection and Incident Report

Name of person completing this report:	
Job Title:	
Date:	Time:

This report should be completed IMMEDIATELY following any incident which raises any concern about possible child abuse (e.g. on observation of an unexplained/suspicious injury or following something said by a child which causes concern). It should be completed by the member of staff most directly involved. Care must be taken to record the information accurately and confidentially. This form must be passed AS SOON AS POSSIBLE to one of the School's Designated Safeguarding Leads and a decision made about what should happen next.

Details of Incident	
Name of child:	
Date of Birth:	Form:

Record here EXACTLY what you saw or heard, including actual site of any injury (e.g. upper right arm), size/colour of bruising etc. or an exact record (as far as possible) of anything said to you by the child. Record also any relevant comments made by yourself (avoid asking any more questions than are necessary to clarify any uncertainties.) Attach an additional sheet of paper if required.
<b>Signature:</b>

<b>Reported to the Designated Safeguarding Lead:</b>	<b>at: (time)</b>	<b>on: (date)</b>
<b>Action Taken/No Further Action Taken: (please specify)</b>		
<b>Signed (person reporting incident)</b>		
<b>Signed (Designated Safeguarding Lead)</b>		

Child Protection form

**This record should be given to the Head of Safeguarding who will keep it securely in the office.**

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**PART 2: (for use by Designated Safeguarding Lead)**

Time & date information received by Head of Safeguarding, and from whom	
Any advice sought by Head of Safeguarding (date, time, name, role, organisation & advice given)	
Action taken (referral to children's services/ monitoring advice given to appropriate staff/ CAF etc) If decision not to refer, justify reason.	
Note time, date, names, who information shared with and when etc.	
Parent's informed Yes / No and reasons	
Outcome  Record names of individuals/agencies who have given you information regarding outcome of any referral (if made)	
Where can additional information regarding child/ incident be found? (e.g. student file, serious incident book)	
Feedback given to member of staff reporting concern	
<b>Signed / Date/ printed name</b>	

## 4.6. Appendix F

Adapted from 'A continuum of children and young people's sexual behaviours' (Hackett, 2010)

<b>Appropriate</b>	<b>Inappropriate</b>	<b>Problematic</b>	<b>Abusive</b>	<b>Violent</b>
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Behaviour accepted by peers within peer group context	Developmentally unusual and socially unexpected	Includes misuse of power	Highly Intrusive
Consensual	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Mutual	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	Sadism
Reciprocal		May lack reciprocity or equal power	Informed consent lacking or not able to be freely given by victim	
Shared decision making		May include levels of compulsivity	May include elements of expressive violence	