



SIR THOMAS RICH'S

Child Protection and Safeguarding Children Policy (including allegations against members of staff)

This policy was drawn up in accordance with the *Area Child Protection Committee and the Education (prohibition from teaching and working with children) Regulations 2003*; the *Gloucestershire Safeguarding Children policies (all maintained up-to-date online at www.gscb.org.uk)*; *Working Together to Safeguard Children (DfE, June, 2018)* and *Keeping Children Safe in Education (DfE, September 2018)*; together with *Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, July, 2018)* and *What to do if you're worried a child is being abused, Advice for practitioners (DfE, March 2015)*. This policy should be read in conjunction with these DfE statutory guidance documents, the Prevent duty (DfE June 2015), the School's *Preventing Extremism and Radicalisation Policy*, the *Staff Code of Conduct*, *staff recruitment and induction protocols*, the *staff CPD policy*, the *Anti-bullying policy*, the *ICT policy* and *Acceptable User agreements* and the *School's Behaviour and Discipline policy*.

Reviewed: September 2018

Next review: September 2019

Status: Statutory

Responsibility: The School's Senior Management Team (SMT) draws up and implements the Child Protection and Safeguarding Children Policy. It is the responsibility of the Governors' Personnel Committee to review the policy annually, monitor its implementation and recommend its approval to the Full Governing Body.

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1. Introduction

As well as their other statutory duties, schools have a pastoral responsibility towards their pupils. All children regardless of age, gender, culture, race, religion or sexual orientation are entitled to be protected from harm, abuse and neglect. In any intervention, the emphasis is, first and foremost, on the **best** interests of the child.

We recognise that, because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. All staff have an equal responsibility to act on any suspicion or disclosure that a child is at risk. **Safeguarding is everyone's responsibility.** School staff should not assume that someone else will take action and **should not** assume that somebody else will take action. Staff should share information that might be critical in keeping a child safe. The School will follow the procedures set out by the Gloucestershire Safeguarding Children Board and guidance issued by the Department for Education.

Safeguarding and promoting the welfare of children is defined as:

“protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes”.

Children cannot learn effectively unless they feel secure. This policy will help the School in:

- a) ensuring we practise safe recruitment in line with Government guidance by using at least one accredited “Safer Recruiter” on all interview panels and by checking the suitability of staff and volunteers to work with children and ensuring any unsuitable behaviour is reported and managed, using the allegations management procedures;
- b) developing a culture of safer working practice and vigilance, in which staff can exercise their professional judgement to keep children safe and act in a timely way;
- c) raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
- d) developing, and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse by referring to the Children’s Helpdesk;
- e) supporting pupils who have been abused in accordance with his/her agreed child protection plan;
- f) establishing a safe environment in which children can learn and develop;
- g) ensuring pupils have access to ‘early help’ in order to promote their wellbeing.

2. Roles and responsibilities

Governors

It is the responsibility of the governors to ensure that the School:

- complies with their safeguarding duties under legislation;
- has a Safeguarding Policy in place which is updated annually;
- appoints a member of the Senior Management Team as Designated Safeguarding Lead (DSL) and a deputy DSL, who have received appropriate formal training which is updated every two years. Additionally, they should update their knowledge and skills at regular intervals and at least annually;
- delivers regular training to all staff including site staff on child protection issues;
- has a nominated governor for safeguarding who has been trained; (This is currently Ms J Wilton.)
- creates a culture where the welfare of pupils is of paramount importance;
- ensures staff and pupils feel able to raise concerns, and that these are handled sensitively;
- ensures safeguarding issues are addressed within the curriculum;
- contributes to interagency working and plans;
- has an appropriate response to children who go missing in education;
- has safe recruitment procedures, and that at least one person on the appointment panel is safer recruitment trained;

- has procedures for dealing with allegations of abuse against members of staff, including allegations against the Headmaster and other children.
- has procedures for dealing with children who go missing from education
- takes a proportionate risk-based approach to safeguarding children

Headmaster

It is the responsibility of the Headmaster to ensure that:

- the Child Protection and Safeguarding Children policy is in place, updated annually and followed by staff;
- all staff receive Safeguarding training when they commence work at the School. The training will be regularly updated. Induction and training will be in line with advice from the Local Safeguarding Children's Board. Thereafter, all staff will receive, at least once a year, safeguarding and child protection updates e.g. via email, e-bulletins and staff meetings;
- all staff read Part 1 of Keeping Children Safe in Education September 2018, this policy, the Staff Code of Conduct, the Preventing Extremism and Radicalisation policy, Guidance for Safer working Practice for Adults who Work with Children and Young People, Working together to safeguard children, the Behaviour and Discipline policy. In addition, they should read School's policies on wider safeguarding issues, i.e. Anti-Bullying, ICT (acceptable use policy) and be aware of the procedures for safeguarding children who go missing from education.
- all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, recognise the specific needs of pupils with special educational needs and disabilities and their responsibility for referring any concerns to the designated senior person responsible for safeguarding and child protection;
- all staff (including temporary, supply staff, volunteers and site staff) and the Governing Body know the name, and identity of the designated senior person and the deputy designated senior person responsible for safeguarding and child protection and their role;
- ensure that the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Leads (DDSLs) are always available to discuss safeguarding concerns;
- pupils are provided with opportunities in PSHE and across the curriculum to develop the skills, they need, to keep themselves safe from abuse, including online;
- establish and maintain an environment in which children feel secure, are encouraged to talk, and are listened to, where their feelings and wishes are taken into account in any measures the School puts in place to protect them;
- children know that there are adults in the School, who they can approach, if they are worried.
- locally agreed procedures are followed where an allegation is made against a member of staff or volunteer, including supply or agency workers, contractors, governors or other pupils.
- safe recruitment practices are always followed, that at least one person on the appointment panel is safer recruitment trained, references are requested prior to interview and that references received are authentic, from someone with authority and both from the most recent employer and the most recent educational setting.
- the principles in the Staff Code of Conduct underpin the School's duty to safeguard and protect children and young people;
- parents have an understanding of the responsibility placed on the School and staff for child protection by setting out its obligations on the School website.

Designated Safeguarding Lead (DSL)

The School's DSL is the Headmaster, Matthew Morgan, who is also the Child Protection Officer. It is his responsibility to:

- act as a source of support, advice and expertise on safeguarding;
- undertake formal training every two years. In addition, safeguarding knowledge and skills should be updated at regular intervals and at least annually e.g. by e-bulletins, meeting other DSL, reading and digesting safeguarding developments;
- undertake Prevent awareness and Channel general awareness training and, together with the School's Prevent Single Point of Contact (SPOC), be able to provide advice and support to staff on protecting children from radicalisation;
- ensure all staff receive appropriate safeguarding training when they commence work at the School and regularly thereafter. Keep a record of staff attendance at child protection training;

- liaise with the Chair of Governors and the nominated governor for safeguarding;
- manage all referrals and work with other agencies and services to promote the welfare of children and protect them from harm and co-operate, as required, with their enquiries regarding child protection matters, including attendance at child protection conferences and core groups;
- have an understanding of the procedures of the Local Safeguarding Children's Board, and be able to attend and contribute to child protection review conferences, if required;
- ensure all records relating to safeguarding and child protection, when noted and reported by staff or disclosed by a child, are kept securely, separate from the main pupil file, and in locked locations;
- report to the Police any cases where Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18;
- notify the relevant social worker if there is an unexplained absence of more than two days of a pupil who has a Child Protection Plan (previously known as being on the child protection register);
- ensure that, when a child with a protection plan leaves the School, their information is passed to their new school and social services notified;
- refer to the Disclosure and Barring Service anyone who has harmed or poses a risk to a pupil;
- provide appropriate support to pupils and staff involved in child protection issues;
- make this policy available to parents.

In the absence of the DSL the Deputy Designated Lead, currently the Deputy Headteacher, Debbie Brake, will carry out the duties of the DSL. The Deputy DSL is appropriately trained to fulfil the role. In the absence of both the DSL and Deputy DSL, concerns will be referred to Peter Daniell, Assistant Headteacher. In the absence of Matthew Morgan, Debbie Brake and Peter Daniell concerns will be referred to Rhys Davies (Key Stage 3 Manager). These staff have received the same level of training as the DSL.

Specifically, when a safeguarding issue is raised, the DSL will follow the procedures outlined below.

- Refer cases of suspected neglect or abuse to Social Services. Make an immediate referral to Social Services and the Police where a child is in immediate danger or at risk of harm;
- In the event of an injury, arrange immediate treatment in whichever way seems most appropriate;
- If concerns are raised by a member of staff, ensure the member of staff has noted these concerns in writing and speak to the child as soon as is practically possible and no later than the end of the school day. Keep a written record of the conversation and any subsequent telephone calls or conversations. All concerns are recorded, even where there is no need to refer the matter immediately;
- Contact the Children's Helpdesk at Shire Hall (01452 426565) to discuss concerns in principle with a social worker or social work manager and receive advice about whether a referral is appropriate, or whether there are alternative ways of addressing their concerns;
- Provide basic information to the Children's Helpdesk and use the secure portal (Front Door) for referring concerns about a child. This is passed on to a social work team, and the DSL will be contacted by a social worker within 24 hours (unless there are immediate risks in which case the professional will be put through to a social work team straight away). The social work team will discuss whether the referral is appropriate and what action can/will be taken;
- Discuss the situation with the family of the pupil, if appropriate, and, where possible, seek their agreement to the referral. However, this only applies where such a discussion will not place the child at increased risk of significant harm;
- Make suitable arrangements if the child is felt to be in danger at home. He/she should not be allowed to go home;
- Where a child's situation, following a referral, does not improve, press for reconsideration;
- If required, participate in further assessment, either through an early help assessment, through a child in need assessment or a child protection enquiry.
- If not forthcoming, request information of the timing of the strategy discussion between the statutory agencies which decides whether and how to investigate.

All Staff

It is the responsibility of **all** staff to:

- read and understand the statutory guidance on Safeguarding/ Part 1 of Keeping Children Safe in Education September 2018;
https://www.gscb.org.uk/media/1519919/keeping_children_safe_in_education_-_part_1_-_september_2018.pdf
- read and understand this policy, the Staff Code of Conduct, the Preventing Extremism and Radicalisation policy, Guidance for Safer working Practice for Adults who Work with Children and Young People, the School's Behaviour and Discipline policy and Working together to safeguard children:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf
- read the School's policies on wider safeguarding issues, i.e. Anti-Bullying, ICT (acceptable use policy), Staff Code of Conduct and be aware of the procedures for safeguarding children who go missing from education.
- understand the role of the DSL;
- risk manage any time spent 1:1 with pupils;
- attend training sessions on Safeguarding;
- be vigilant to changes in pupils' behaviour and to the signs of abuse. See Appendix 2;
- inform immediately the DSL if they become suspicious of abuse or are told by a child that abuse has taken place;
- be aware of those pupils who may be the most vulnerable to abuse. See Appendix 3;
- have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.
- Ensure they are aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:
 - bullying (including cyberbullying);
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence and sexual harassment;
 - sexting (also known as youth produced sexual imagery); and
 - initiation/hazing type violence and rituals.
- understand their role in the early help process e.g. by identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and acting as the lead professional in undertaking an early help assessment if required;
- record any concerns and/ or disclosures in writing, accurately and legibly, and pass to the DSL, Matthew Morgan, or in his absence the Deputy DSL, Debbie Brake. In the absence of both, refer concerns to the Assistant Headteacher, Peter Daniell, or in his absence Key Stage 3 Manager, Rhys Davies. They will keep the DSL informed at all times;
See DfE publication "What to do if you are worried that a child is being abused. Advice for Practitioners."
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- deal sensitively with any disclosures by pupils of abuse or neglect and follow the guidelines in Appendix 4;
- telephone the Children's Helpdesk at Shire Hall (01452 426565) for advice if they feel that their concerns are not being addressed, (cf they should refer to the School's Whistleblowing policy or contact the Local Authority to implement social care's escalation procedure, if appropriate).
- be aware that **anyone can make a referral**. School staff should not assume that someone else will take action and **should not** assume that somebody else will take action. Staff should share information that might be critical in keeping a child safe. Staff must also ensure that they inform the DSL as soon as possible. The Local Authority will make a decision of what action to take within one working day and inform the referrer of the outcome. Staff must follow up on a referral if this information is not forthcoming. They may be required to work with social workers and other agencies following a referral;
- press for reconsideration if, after a referral, the child's situation does not appear to be improving;
- report to the DSL any acts of Female Genital Mutilation (FGM). The DSL will inform Social Services and the Police.
- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, should consider the context within which such incidents and/or behaviours occur. Additional information regarding contextual safeguarding is available here:
<https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

3. Absence and Children Missing Education

- a) Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. The School recognises that a child going missing from education is a potential indicator of abuse and neglect.
- b) Where a child does not arrive at school, without prior notice from their parent(s), carer(s) or guardian(s), the School will alert their parent(s), carer(s) or guardian(s).
- c) The School will notify the relevant social worker if there is an unexplained absence of a pupil who has a Child Protection Plan.
- d) If a child's whereabouts is not known, the School's Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will be informed. Together with the Attendance Officer, and after advice has been sought from other agencies, an action plan will be formulated and followed until the child is located.
- e) If the School believes a child has "gone missing", the School will follow guidance given by the DfE in Annex A: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf of the publication, Keeping Children Safe in Education, September 2018: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf.
- f) The School will liaise with Gloucestershire Safeguarding Children Board, other agencies, where appropriate, and the Police.
- g) The School will be alert to potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.
- h) In cases of persistent absence and prolonged periods of absence, the School will work closely with parents, carers and guardians and other agencies, where appropriate, in order to endeavour to improve attendance.
- i) The School will inform the Local Authority of any pupil who has been deleted from the register where they have been taken out of school by parents to be educated outside the school system; ceased to attend school and no longer lives within reasonable distance; certified as unlikely to be in a fit state of health to attend before ceasing to be of compulsory school age; is in custody for a period of more than four months and not expected to return afterwards or any pupil who has been permanently excluded.

4. Early Help and Intervention

The School recognises that vulnerable children may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The School may be the only stable, secure and predictable element in the lives of children at risk. The School will work together with all relevant agencies to provide a coordinated offer of early help. The School will endeavour to support all pupils through the provision of Early Help by:

- a) providing high quality learning and teaching in PSHE lessons and across the curriculum alongside robust pastoral support that promotes the well-being of pupils and gives them the skills and knowledge that they need to recognise and stay safe from all forms of abuse;
- b) having a school ethos that promotes a positive, safe and secure environment and gives pupils a sense of being valued;
- c) actively encouraging the Pupil Voice where pupils can speak about any concerns they have to a member of staff. Pupils are encouraged to speak openly, and they are aware that staff take their concerns very seriously;
- d) ensuring that the Behaviour policy, the Anti-bullying policy, the Anti-drugs policy, the ICT policy, the Sex and Relationships Education policy, the Supporting pupils with Medical Needs policy and the Staff Code of Conduct support vulnerable pupils in the School;
- e) minimising peer on peer abuse through the School curriculum, in particular PSHE and Citizenship, the pastoral system and compliance with the above policies;
- f) ensuring staff are aware that **any** child may benefit from early help, but should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
 - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
 - is a young carer
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - is frequently missing/goes missing from care or from home
 - is at risk of modern slavery, trafficking or exploitation
 - is at risk of being radicalised or exploited
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing drugs or alcohol themselves
 - has a family member who is in or has recently been released from prison
 - is in the court system or has a family member in the court system
 - has experienced homelessness or displacement or has a family member who has experienced homelessness or displacement or is living away from home or in temporary accommodation
 - is living in chaotic and unsupportive home situations
 - is living transient lifestyles
 - has experienced and or witnessed domestic abuse or sexual violence
 - is vulnerable to being bullied, or engaging in bullying
 - is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
 - does not have English as a first language
 - is at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.
- g)** ensuring that all unexplained absences are followed-up with a text or an email to parents within an hour and a response is given. Long-term or repeated absences will be investigated by the Form Tutor, Head of Year and Head of Key Stage (where a pupil's absence is unexplained, the School would follow the Gloucestershire missing children protocol);
- h)** ensuring that, when a Looked After Child is enrolled at the School, a teacher is designated and trained to support and promote his/her achievements. The DSL or Deputy DSL will ensure staff have access to pertinent information and the child's needs are met;
- i)** ensuring staff are aware that signs of abuse and neglect in pupils with special needs and disabilities (SEND) can be more difficult to recognise and erroneously attributed to their special needs or disability. Further exploration should always be undertaken;
- j)** alerting staff to specific types of abuse such as Honour Based Violence, Forced Marriage, Female Genital Mutilation, Domestic Abuse, Teenage Relationship Abuse, Faith Abuse, Gangs and Youth Violence, Gender Based Violence, Child Sexual Exploitation and Trafficking, Induced Illness, Peer on Peer Abuse, Drug Abuse (*see Anti-drugs policy*) and Sexting.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741314/Keeping_Children_Safe_in_Education_3_September_2018_14.09.18.pdf
- k)** being vigilant and considering links between mental health concerns, including self-harm, and possible abuse. See also Appendix 3, children who are particularly vulnerable to abuse.
- l)** ensuring that staff recognise their duty to have due regard to the need to prevent people from being drawn into terrorism and following statutory guidance in order to fulfil its responsibility. The School will liaise closely with the Police in this respect. The School has a designated member of the Senior Management Team (currently Mr CDA Carter) with responsibility for the Prevent duty. (*See the School's Preventing Extremism and Radicalisation policy*)
- m)** ensuring that staff are aware of Contextual Safeguarding and they recognise that young people are vulnerable to abuse in a range of social contexts.

For more information on Early Help, staff may refer to Gloucestershire Safeguarding Children Board's guidance on the Graduated Pathway of Early Help and Support including allocations meetings:

<http://www.gloucestershire.gov.uk/early-help-for-families>

5. Peer on Peer Abuse (see also section 10)

The School recognises that children are capable of abusing their peers. Staff will be aware of the harm caused by bullying and will use the School's anti-bullying procedures where necessary. All peer on peer abuse is unacceptable and will be taken seriously.

Peer on peer abuse can take many forms, including:

- **physical abuse** such as biting, hitting, kicking or hair pulling
- **sexually harmful behaviour/sexual abuse** such as inappropriate sexual language, touching, sexual assault
- **sexting**, (also known as youth produced sexual imagery) including pressuring another person to send a sexual imagery or video content
- **teenage relationship abuse** - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse will never be tolerated or passed off as 'banter' or 'part of growing up'. The School will endeavour to provide a transparent and open and environment where young people feel safe to share information about anything that is upsetting or worrying them to minimise or prevent the risk of peer on peer abuse. Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the negative effects of bullying. Tutor time, PSHE lessons and opportunities across the curriculum are used to reinforce the message through stories, role play, current affairs and other suitable activities. Staff will endeavour always to create surroundings where everyone feels confident and at ease and we will ensure that the school site and all school activities are well supervised, especially in areas where children might be vulnerable.

All allegations of peer on peer abuse should be passed to the Head of Year who will inform the DSL immediately. They will then be investigated and dealt with as follows (staff will refer to the School's protocol on undertaking investigations):

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

Where allegations of sexual violence or sexual harassment are made, the school will act in accordance with the guidance set out in Part 5 of *Keeping Children Safe in Education (2018)*. Where allegations of sexting are made, the School will follow the advice for Schools and Colleges on Responding to Sexting Incidents published by The UK Council for Child Internet Safety (UKCCIS) Education Group. <https://www.childnet.com/blog/new-sexting-guidance-for-schools-released-by-the-uk-council-for-child-internet-safety>

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate. This may include seizure of devices and interviews with the young people involved.

Supporting those involved

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil or pupils that caused harm. The School will seek to understand why the pupil(s) acted in the way they did and consider what support may be required to help the pupil(s) and/or change behaviours.

6. Sexual Exploitation of Children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The school includes the risks of sexual exploitation in PSHE lessons, across the curriculum and in tutor time. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

7. Honour-Based Violence

'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday period. Staff should immediately report suspected FGM to the Police and the DSL.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

School staff receive training and are alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England. Staff should immediately report a suspected forced marriage to the DSL.

8. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the school will notify the Local Authority of the circumstances.

9. Online Safety

(Please see ICT policy, Data Protection policy and ICT Acceptable Use policy)

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to pupils, who can contact our pupils and the personal conduct of our pupils online. Pupils are educated about safety in assemblies, as part of tutor time and in computing lesson and in PSHE. Concerns regarding online safety should be reported to the Head of Year who will immediately report the matter to the DSL.

They will then be investigated and dealt with as follows:

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decision on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police.
- **Involving parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. The School's focus is always on the safety and wellbeing of child.

In an investigation, staff will follow the guidance from the DfE in carrying out any searching, screening or confiscation of items belonging to pupils:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf

10. Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment is not acceptable and will not be tolerated at Sir Thomas Rich's. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. The School follow the Department for Education's advice:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges> together with the advice in Keeping Children Safe in Education (2018):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741314/Keeping_Children_Safe_in_Education_3_September_2018_14.09.18.pdf

The School will ensure that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Reports of sexual violence should be made to the DSL (or a deputy) who will undertake an immediate risk and needs assessment. The risk and needs assessment will consider:

- the victim, especially their protection and support;

- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school especially any actions that are appropriate to protect them.

The School will work with children's social care and specialist services as required. The School will consider carefully:

- the wishes of the victim in terms of how they want to proceed. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse;
- if there are ongoing risks to the victim, other children, adult students or school staff; and
- other related issues and wider context.

As always, when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the School will follow the general safeguarding principles as set out throughout this policy.

11. Further Safeguarding Issues

Site security

- Visitors are required to enter via one entrance and sign in and are given a badge. They will normally be escorted and supervised while on site.
- Volunteers will undergo checks commensurate with their role in the school and contact with pupils.
- The identity of contractors working on site will be checked if they work in regulated activity or unsupervised.
- The School is mindful of its Prevent duty and has systems in place to deal with intruders. *See the School's Preventing Extremism and Radicalisation policy.*

Off-site visits, extracurricular activities and work experience placements

Staff must consider and put in place appropriate strategies to ensure the safeguarding of children when planning and conducting educational visits, extended services and extra-curricular activities and work experience placements. They should refer to the following guidance:

The Gloucestershire Safeguarding Children policies (all maintained up-to-date online at www.gscb.org.uk); Working together to Safeguard Children (DfE March 2018); Keeping Children Safe in Education (DfE September 2018); Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE March 2015) and What to do if you are worried a child is being abused. Advice for practitioners (DfE March 2015) and the School's Offsite Visits policy.

Foreign Exchanges

Particular attention is paid to the placing of pupils in suitable homes on foreign exchanges. Staff will ensure that arrangements are made so that they have regular, direct contact with pupils and that pupils have a clearly established means of contacting staff at all times, especially in an emergency. Contingency plans will also be in place which may include alternative accommodation arrangements, for example if it becomes necessary to move a pupil from their host family.

When families host overseas pupils on foreign exchanges, the School requires parents and family members over the age of 18 to obtain DBS certification.

Photography and images

The School seeks consent from parents to publish images of their child in School publications or on the School website. The child's name is not published with the image. Images are stored securely. Personal data is not shared.

Showers and changing

- a) Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment. *See also Staff Code of Conduct.*
- b) Staff should be vigilant about their own behaviour and mindful of the needs of the pupils. For example, members of staff change clothes or take a shower in the same room as the pupils in their care.
- c) It is recommended that, wherever possible, two members of staff of the same gender as the children should supervise a group as this will ensure cover in the event of an accident or incident or if one supervisor is called away. In this context, it is important that staff balance the need for adult supervision with the rights of children to privacy.
- d) When using facilities that are open to the public such as a swimming pool or leisure centre, staff should endeavour to make arrangements so that pupils have sole use of changing facilities. For example, it may be possible to negotiate specific time slots for the group so they have exclusive use of the changing rooms or an area within the changing facility could be designated to the group. Alternatively, young people could be given the option to change at school or at home before the activity. This will obviate any risks and potential vulnerability associated with pupils mixing with adults or other young people whether they be known or unknown to them.

Staff should refer to the NSPCC Child Protection in Sport briefing: Safe use of changing facilities. <https://thecpsu.org.uk/resource-library/2013/safe-use-of-changing-facilities/>

12. Inter-agency Working

The School is committed to contributing to inter-agency working in line with statutory guidance. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. This includes:

- a) Liaison with other agencies, which support the pupil including social care, Child and Adult Mental Health Service, education welfare service and educational psychology service.
- b) Ensuring that where a pupil who has a child protection plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

13. Sharing Information

The School is aware that where there are concerns about the safety of a child, the sharing of information in a timely and effective manner can reduce the risk of harm.

- a) The Safeguarding and Child protection policy alongside the Behaviour and Discipline policy, the Anti-bullying policy, the Anti-drugs policy, the Exclusion policy, the Data Protection policy and the Freedom of Information policy facilitate the School's duty to contribute to interagency working. N.B. Child protection records are exempt from disclosure under the data protection Act which means that pupils and parents do not have an automatic right to see them.
- b) Information about pupils' academic progress and well-being is shared routinely with relevant staff by Form Tutors, Heads of Year and the SMT. This is done verbally, through the use of file notes or through the
- c) Cyclone system. In addition to this, information about vulnerable pupils is shared with SMT, all Heads of Year, teaching staff and relevant support staff through the TLC list. Wherever possible, staff are open and honest with pupils and parents, where appropriate, as to why, what, how and with whom, their information will be shared.

- d) When making decision on what information to share, staff should refer to the Designated Safeguarding Lead, currently the Headmaster. Staff should also refer to the principles set out in the DfE publication: *Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents and carers (March, 2015)* However, the most important consideration is whether sharing information is likely to safeguard and protect a child.
- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

14. Allegations

Where a parent or child makes a complaint about poor practice towards a child that does not reach the threshold for child protection action, the School's Complaints Policy will be followed. If staff members have concerns about another staff member, they should speak to the Headmaster, and these will be dealt with through the School's disciplinary and grievance procedures. Concerns about the conduct of the Headmaster should be addressed to the Chair of Governors. All staff may raise concerns about unsafe safeguarding practice which will be taken seriously by Senior Management. *See the School's Whistleblowing Policy.*

If a member of staff has behaved in a way which has harmed or may harm a child, possibly committed a criminal offence relating to a child or behaved in a way that indicates he or she could pose a risk of harm to children, the following procedures will be followed:

Allegations against staff

- a) If an allegation has been made against a member of staff, the Headmaster (and in his absence the Deputy Head) will contact the Local Authority Designated Officer for Allegations (01452 426994). The LADO will offer advice on any immediate action required and will assist with employment and safeguarding issues.
- b) If, after the Initial Discussion with the LADO, it is agreed that the allegation meets the criteria, a multi-agency meeting will be convened, and the Headmaster will be invited. This might result in a criminal investigation, a Social Care investigation or and/or an investigation to inform whether disciplinary action is required. If it is agreed that the allegation does not meet the criteria, the LADO will record the Initial Discussion and send it to the Headmaster for our records. Any further action will be taken within the School if necessary. Procedures for dealing with allegations against staff are laid out in the Gloucestershire Safeguarding Children Board procedures and protocols: https://www.gscb.org.uk/media/1204/dcpo_handbook_version_live10_-_jan_16-31580.pdf
- c) If an allegation is made about the Headmaster, the member of staff, to whom the information has been disclosed, must contact the The Chairman of Governors who will contact the Local Authority Designated Officer for Allegations (01452 426994). The LADO will offer advice on any immediate action required and will assist with employment and safeguarding issues.
- d) An allegation will always be acted upon even if the accused resigns or ceases to provide his/her services. No compromise or settlement agreement will be entertained.
- e) The School recognises its duty of care to its employees and will provide support to victims of an allegation and a named contact, if suspended. It will maintain confidentiality during an investigation and keep detailed records, which it will retain until the accused is of normal retirement age or for a period of ten years from the date of the allegation, if that is longer. Details of false and malicious allegations will be removed from personnel files and not included in references.

15. Safer Recruitment

- a) Safer recruitment training became mandatory for the recruitment of school staff from 1 January 2010. This means a recruitment panel must have at least one member who has completed the training; or where an individual is in charge of recruitment, that individual must have completed the training (Mr M Morgan Mr D. Dempsey, Mr R Davies and Miss D Brake have successfully completed this training.)
- b) A single Central Record is maintained in accordance with Keeping Children Safe in Education 2018.

- c)** DBS checks will be made for all staff working with children. All new staff must be checked as well as those who change jobs or who have had a break in service for longer than three months. In addition to DBS checks, the School will undertake 'prohibition' checks with the Department for Education in order to ensure staff have not been prohibited from the profession for reasons of unacceptable conduct. The School will use the checklist provided by Gloucestershire Safeguarding Children Board in order to ensure it follows safer recruitment practices.
- d)** The School will request references from a legitimate source of authority and the authenticity of electronic references will be checked. Additionally, the School will ensure that references are sought from the most recent employer and the most recent educational setting. References will be sought from internal vacancies.
- e)** Where a staff member has been dismissed due to safeguarding concerns, or would have been had they not resigned, a referral will be made to the Teacher Regulation Agency.

Appendix 1:

Types of abuse and neglect

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Appendix 2:

Indicators of abuse

A child who is being abused and/or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

Appendix 3:

Children who may be particularly vulnerable

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who:

- are missing education/missing from education
- are frequently missing/go missing from care or from home
- are disabled and have specific additional needs
- have special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- are young carers
- are Looked After Children
- are privately fostered children
- are affected by mental health issues including self-harm and eating disorders
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- are affected by adult mental health issues
- have experienced and or witnessed domestic abuse or sexual violence
- are affected by substance misuse/drug use in their home environment
- are misusing drugs or alcohol themselves
- are at risk of modern slavery, trafficking or exploitation
- are affected by poor parenting
- are at risk of Fabricated or Induced Illness
- are at risk of being radicalised or exploited
- are asylum seekers
- have a family member who is in or has recently been released from prison
- are in the court system or has a family member in the court system
- have experienced homelessness or displacement or has a family member who has experienced homelessness or displacement or is living away from home or in temporary accommodation
- are living in chaotic and unsupportive home situations
- are living transient lifestyles
- are vulnerable to being bullied, or engaging in bullying including cyber, homophobic, racist etc.
- are LGBT (lesbian gay bisexual transgender)
- are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- are vulnerable to faith abuse
- are involved directly or indirectly in child sexual exploitation CSE or trafficking
- do not have English as a first language
- are at risk of female genital mutilation (FGM)
- are at risk of forced marriage.

This list provides examples of additional vulnerable groups and is not exhaustive.

Appendix 4:

Guidelines for responding to disclosure of abuse or neglect by a pupil.

During your conversation with the pupil:

- Allow them to speak freely.
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort.
- Do not be afraid of silences.
- Do not ask the child leading questions as this can later be interpreted as putting ideas into the child's mind and have an effect on the evidence which might be put forward if there are subsequent criminal proceedings.
- Ask open questions focusing on: What? When? Who? Where?
- Do not start your own investigation by asking for more detail e.g. by asking how many times this has happened,
- Do not offer your own opinion either verbally or in any written reports.
- **Do not give undertakings of absolute confidentiality.** At an appropriate time tell the child that in order to help them you have a responsibility to must pass the information on to the appropriate agencies.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. The child may interpret this as having done something wrong.
- Tell the child what will happen next. The child may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- Report verbally to the DSL.
- Write up your conversation as soon as possible and hand it to the DSL.
- Seek support if you feel distressed.