



## **Safeguarding Policy**

*Reviewed September 2023*

*Modelled on the Hertfordshire County Council*

*Child Protection Policy for Schools (Issue Date: September 2023)*

### **1. AIMS**

- 1.1 To be a Catholic school where all members of the community live according to Gospel values and the principles and teachings of Mary Ward, promoting the virtues of freedom, sincerity, justice truth and joy, to allow all members of the community to feel secure and able to work and live in an atmosphere of courtesy and respect.
- 1.2 The Governors seek to ensure that the values of Mary Ward are reflected in the planning and delivery of all policies. The principle values covered by this policy are:
  - Freedom – This policy aims to ensure that children are protected from harm and are thereby given the freedom to live their lives to the full.
  - Justice – This policy also aims to ensure that those who seek to harm children in any way are prevented from doing so and, when necessary, face the legal consequences of their actions.
  - Truth – To be a community where people feel safe and are encouraged to share their worries and speak about their concerns.
- 1.3 To inform governors, staff, parents and volunteers about the school's responsibilities for safeguarding children.
- 1.4 To enable everyone to have a clear understanding of how these responsibilities should be carried out.

### **2. GUIDING PRINCIPLES**

- 2.1 Safeguarding is defined as protecting children from maltreatment, preventing impairment of children's mental and physical health and / or development, ensuring that children grow up in the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- 2.2 The school follows the procedures established by the Hertfordshire Safeguarding Children Partnership, a guide to procedure and practice for all agencies in Hertfordshire working with children, in accordance with the Statutory Framework. (See Appendix 1).
- 2.3 All school staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop, because they have daily contact with children.
- 2.4 They should be aware of the important role the school has in the early recognition of the signs and symptoms of physical, sexual and emotional abuse or neglect, and of the appropriate Child Protection contact process.
- 2.5 Staff members working with children are advised to maintain an attitude of 'it could happen here' and 'it could be happening to this child', where safeguarding is concerned. When

concerned about the welfare of a child, staff members should always act in the interests of the child.

- 2.6 The school will establish and maintain an environment where children feel valued and secure, are encouraged to talk, and are listened to when they have a worry or concern.
- 2.7 The school will ensure that children know that there are adults whom they can approach if they are worried.
- 2.8 There will be opportunities provided within the PSHE/RSE curriculum for children to develop the skills they need to recognize and stay safe from abuse. (Refer to KCSIE (DfE 2023) page 33 – 35).
- 2.9 Every effort will be made to support any child known to have suffered from abuse.
- 2.10 The school will establish and maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and well-being of a child.
- 2.11 The school will ensure that children who have additional/unmet needs are supported appropriately.
- 2.12 According to the Equality Act, schools and colleges **must** not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- 2.13 This policy forms part of a group of documents and policies which relate to the safeguarding responsibilities of the school. (See Appendix 2) In particular, this policy should be read in conjunction with the Safer Recruitment Policy, Behaviour Policy and Anti-Bullying Policy, and Online Safety Policy.

### 3. **ROLES AND RESPONSIBILITIES**

- 3.1 The Governing Body has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in the school. (See Appendix 3) The Governing Body has responsibility for setting and maintaining the principles underlying the school's policy, reviewing and endorsing agreed strategies through the Personnel Committee. The nominated Governor is Mr M Healy who will take an overview of Child Protection, including the relevant training of staff.
- 3.2 In particular the Governing Body must facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
  - appropriate safe recruitment procedures are in place;
  - relevant safeguarding children training for school staff is attended.
  - that an effective child protection policy is in place, together with a staff behaviour policy;
  - staff are provided with Part One of Keeping Children Safe in Education (DfE 2023) –and are aware of specific safeguarding issues;
  - staff induction is in place with regards to child protection and safeguarding;
  - the appointment of an appropriate senior member of staff to act as the Designated Safeguarding Lead;
  - all of the Designated Safeguarding Leads (including deputies) undergo formal child protection training every two years (in line with HSCP procedures) and receive regular (annual) safeguarding refreshers (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments);

- they prioritise the welfare of children and young people and create a culture where staff are confident to challenge senior leaders over any safeguarding concerns;
  - that children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum;
  - appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. (Additional information to support governing bodies and proprietors is provided in Part 1 of **Keeping Children Safe in Education (DFE 2023)**); and
  - that they contribute to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified;
- 3.3 The Headteacher and Leadership Team will oversee the framing of a policy that aims to create an environment in which children are safe. A draft will be given to the Governing Body to be considered and approved after consultation with other stakeholders. The Headteacher and Leadership Team will also appoint a Designated Safeguarding Lead with responsibility for Child Protection and organize support for the implementation of the policy.
- 3.4 Headteachers and principals should ensure that the policies and procedures, adopted by their governing body and proprietors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by staff.
- 3.4 Safeguarding policies and procedures will be reviewed annually, and information provided to the local authority about them and about how the above duties have been discharged.
- 3.5 Heads of Year have responsibility for ensuring that the school's policy and procedures are applied in each year.
- 3.6 All members of staff, including teachers, support staff and volunteer helpers, will support the school's policy and do everything in their power to implement it.

All staff will be required to:

- Read Part One and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
  - Sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance and understand their role.
  - Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
  - Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.
- 3.7 The Designated Safeguarding Lead for Child Protection in this school is: Mrs C Ransom  
The Deputy Designated Safeguarding Lead(s) for Child Protection in this school is: Mrs D Brown, Mrs J Caulfield and Mr P Downes.
- 3.8 The broad areas of responsibility for the Designated Safeguarding Lead (DSL) are:
- To manage Child Protection Contacts and cases:
  - To contact the Child Protection Hub for advice when concerns might meet the threshold for statutory intervention.
  - To complete Child Protection Contacts for all cases of suspected abuse or neglect where there is a significant risk of harm to the child/young person and report to the Police (where a crime may have been committed) and to the Channel programme (where there is a radicalisation concern).

- To liaise with the Head Teacher to inform her of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a Child Protection contact by liaising with relevant agencies.
- To support staff who make Child Protection contacts or other referrals.
- To share information with appropriate staff in relation to a child's looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.
- To ensure they have details of the CLA's social worker and the name of the virtual school Head Teacher in the authority that looks after the child.

### 3.9 Training

- The Designated Safeguarding Lead should undergo formal training every two years. The DSL should also undertake Prevent awareness training. In addition to this training, their knowledge and skills should be refreshed (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) at least annually to:
  - Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
  - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
  - Ensure each member of staff has access to and understands the school's safeguarding and child protection policy and procedures, especially new and part time staff.
  - Be alert to the specific needs of children in need, those with special educational needs and young carers.
  - Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
  - Be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
  - Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
  - Be able to keep detailed, accurate, secure written records of concerns, Child Protection Contacts and other referrals.
  - Obtain access to resources and attend any relevant or refresher training courses.
  - Encourage a culture of listening and responding to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.
  - Be aware of pupils who have a social worker. The DSL/DDSL should have details of the child's social worker and the name of the virtual school's head in the authority that looks after the child.

- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.

### 3.10 Raising Awareness

- The Designated Safeguarding Lead (DSL) should:
  - Ensure the school's policies are known, understood and used appropriately.
  - Work with the governing bodies or proprietors to ensure that the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
  - Ensure the safeguarding and child protection policy is available publicly and that parents are aware that advice regarding child protection concerns could be sought from the Child Protection Consultation Hub and that Child Protection Contacts about suspected abuse or neglect may be made. Ensure parents are aware of the role of the school in this.
  - Link with Hertfordshire Safeguarding Children's Partnership (HSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
  - Ensure that when children leave the school they ensure the file for safeguarding and any child protection information is sent to any new school/college as soon as possible but transferred separately from the main pupil file. The file should not be sent until the child is physically attending the new school.
  - Obtain proof that the new school/education setting has received the safeguarding file for any child transferring and then destroy any information held on the child in line with data protection guidelines (see Record keeping Guidance on Hertfordshire Grid for Learning for further information).
  - Consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

## 4. **IMPLEMENTATION OF THE POLICY**

### 4.1 Key Points

- If any member of staff is concerned about a child, he or she must inform the DSL
- Information regarding the concerns must be recorded by the member of staff on the same day. The recording must be a clear, precise, factual account of the observations. It should be dated and signed.

Mrs Ransom will decide whether the concerns should be referred to Children's Services: Safeguarding and Specialist Services. If it is decided that such a Child Protection contact should be made, this will be done with prior discussion with the parents, unless this would place the child at further risk of harm. If a Child Protection contact is made to Children's Services, Mrs Ransom will ensure that a written confirmation of the concerns is sent to Children's Services within 48 hours.

Particular attention will be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a child protection plan, and a written record will be kept.

Records relating to Child Protection will be kept in a secure, locked place, separate from the child's academic file. If a child who is known to have a child protection plan in place changes school, Mrs Ransom will inform the social worker responsible for the case and transfer the appropriate records to the DSL of the receiving school, in a secure manner, separate from the child's academic file.

## 5. **WHEN TO BE CONCERNED**

- 5.1 If staff members have any concerns about a child they will need to decide what action to take. Where possible, there should be a conversation with the Designated Safeguarding Lead to agree a course of action, although any staff member can make a Child Protection contact to Children's Services by ringing 0300 123 4043.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
  - In the event that non-urgent matters arise out of school hours, our DSL can be contacted, if necessary by email.
  - When the DSL is absent, please contact school's Deputy DSLs.
  - If the school's DSL and deputies are not available or cannot be reached for example, during out-of-hours or out-of-term activities please contact the Headteacher or Children's Services on the number above.
- 5.2 If a child is in immediate danger or is at risk of harm, a Child Protection Contact should be made to Children's Services and/or the police immediately. Anyone can make a Child Protection contact. Where Child Protection contacts are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should be informed as soon as possible that a Child Protection contact has been made.
- 5.3 All staff should be aware of the process for making Child Protection contacts to Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm - from abuse or neglect) that may follow a Child Protection Contact, along with the role they might be expected to play in such assessments.
- 5.4 Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.
- 5.5 **A child centred and coordinated approach to safeguarding:**
- 5.5.1 Safeguarding and promoting the welfare of children is **everyone's responsibility**. In order to fulfil this responsibility effectively, each professional should make sure their approach is **child centred**. This means that they should consider, at all times, what is in the best interests of the child.
- 5.5.2 Schools and colleges and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the **best interests** of the child at all times.
- 5.5.2 Options may include:
- managing any support for the child internally via the school's own pastoral support processes;
  - completing a families first assessment or a request for support referral;
  - a Child Protection contact for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer significant harm from abuse or neglect.
- 5.6 **Children who may require early help (known as Families First in Hertfordshire):**

5.6.1 Families First is Hertfordshire's strategy of early help services for families. A directory of early help services is available at [www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) and will help practitioners and families find information and support to prevent escalation of needs and crisis.

5.6.2 All staff should be aware of the **early help process**, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing/escalating concerns so that consideration can be given to a Child Protection contact to Children's Services (Safeguarding and Specialist Services) if the child's situation doesn't appear to be improving.

If early help is appropriate, the Designated Safeguarding Lead (or deputy) will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate.

5.6.3 Staff and volunteers working within the School should be alert to the potential need for early help for children also who are more vulnerable. For example:

- Children with special educational needs (whether or not they have a statutory Education Health Care Plan).
- Children with a mental health need.
- Children who are acting as a young carer.
- Children who are showing signs of engaging in anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Children who are frequently missing or go missing from care or from home.
- Children who are at risk of modern slavery, trafficking, sexual or criminal exploitation.
- Children who are at risk of being radicalised or exploited.
- Children who have a family member in prison, or are affected by parental offending.
- Children whose family circumstances present challenges, such as drug and alcohol misuse, adult mental health and domestic abuse.
- Children who are misusing drugs or alcohol themselves.
- Children who have returned home to their family from care.
- Children at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Children who are privately fostered.
- Children who are persistently absent from education, including persistent absences for part of the school day.

5.6.4 School staff members should be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse and neglect**. They should also be aware of the indicators of maltreatment and **specific safeguarding issues** so that they are able to identify cases of children who may be in need of help or protection.

*See Appendix 5 for information on indicators of abuse and Appendix A of KCSIE for specific safeguarding issues.*

## 5.7 **Extra Familial Harm (formerly Contextual Safeguarding)**

5.7.1 Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the Designated Safeguarding Lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

## 5.7 Children with special educational needs and disabilities:

5.7.1 Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration.
- Assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs.
- Communication barriers and difficulties.
- Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child).
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.
- A disabled child's understanding of abuse.
- Lack of choice/participation.
- Isolation.

5.7.2 If a **teacher** (persons employed or engaged to carry out teaching work at schools and other institutions in England) , in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police. **This is a mandatory reporting duty.** See Appendix 1- Keeping Children Safe in Education (DfE 2023): Annex B for further details.

Hertfordshire Children's Services (including out of hours): 0300 123 4043.

5.7.3 If the allegations raised are against other children, the school should follow section 4.4 of the Hertfordshire Safeguarding Children Partnership Procedures Manual – Children Who Abuse Others. Please see the school's anti-bullying policy for more details on procedures to minimise the risk of child-on-child abuse.

5.7.4 All members of staff should be aware that the main categories of abuse are the six listed below.

- Physical abuse.
- Emotional abuse.
- Sexual abuse.
- Neglect.
- Radicalisation.
- Peer on peer.

Staff should be concerned about a child if s/he presents with indicators of significant harm, as detailed in Appendix 5.

5.7.5 In general, a member of staff should be concerned about a child if s/he:

- has any injury that is not typical of the bumps and scrapes normally associated with children's injuries;
- regularly has unexplained injuries;
- frequently has injuries (even when apparently reasonable explanations are given);
- gives confused or conflicting explanations of how injuries have been sustained;
- exhibits significant changes in behaviour, performance or attitude;
- indulges in sexual behaviour that is unusually explicit and/or inappropriate to her age;
- discloses an experience in which s/he may have been significantly harmed;
- gives staff other cause to believe that s/he may be suffering significant harm, or



- behave in such a way that gives rise to the suspicion that they are at risk of radicalisation.

5.7.6 Generally, in an abusive relationship, the child may:

- appear frightened of the parent/s, other household members or others outside the home;
- act in a way that is inappropriate to her or his age and development (taking into account different patterns of development and different ethnic groups);
- display an insufficient sense of “boundaries”, lack stranger awareness, or
- appear wary of adults and display “frozen watchfulness”.

## 6. DEALING WITH A DISCLOSURE

6.1 If a child discloses that s/he has been abused in some way, the member of staff should:

- listen to what is being said, without displaying shock or disbelief;
- accept what is being said;
- allow the child to speak freely;
- reassure the child but not make any promises which it might not be possible to keep;
- not promise confidentiality, as it might be necessary to refer to Children’s Services: Safeguarding and Specialist Services;
- reassure the child that what has happened is not her or his fault;
- stress that s/he has done the right thing by telling;
- listen, asking questions only when necessary for clarification;
- if necessary, ask **open** questions, not leading questions;
- not criticize the alleged perpetrator;
- explain what has to be done next and who has to be told;
- make a written record, as detailed below, and
- pass the information to the DSL without delay.

### 6.2 **Third Party Disclosures**

6.2.1 It’s everyone’s responsibility to report concerns related to children and make referrals to Children Services and the Police if suspected that a child has been abused or is at risk of abuse.

6.2.2 Therefore, when safeguarding concerns are shared to the DSL in a school by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter also directly rather than assume the responsibility is that of the school. If unsure of how to do this speak to the DSL / head teacher and they will advise accordingly.

### 6.3 **Support**

6.3.1 Dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the DSL.

6.3.2 **If a school /college staff member receives a disclosure about potential harm caused by another staff member, they should see section 11 of this policy– *Allegations involving school staff/volunteers.***

## 7. RECORD KEEPING

7.1 All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding

purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.

7.2 When a child has made a disclosure, the member of staff should:

- record as soon as possible after the conversation. Use the schools Child Protection Recording system which may be electronic or using a record of concern sheet. (proforma available on the Hertfordshire Grid for Learning (HGFL));
- ensure the date, time, place is recorded, and any noticeable non-verbal behaviour and the words used by the child;
- use the body map on the schools recording system or the proforma body map available on HGFL, to indicate the position of any injuries and a clear description of the injury;
- record statements and observations rather than interpretations or assumptions;
- do not destroy the original records in case they are needed by a court;
- all records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

7.3 All concerns must be given promptly to the Designated Safeguarding Lead. No copies should be retained by the member of staff or volunteer.

7.4 The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

## 8. **SUPPORT**

8.1 Where children leave the school, the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designed safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as Designated Safeguarding Leads and SENCOs or the named person with oversight for SEN in a college, are aware as required. If the child has an allocated social worker, they will also inform them of the change of school.

8.2 In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

8.3 Dealing with a disclosure from a child, and with safeguarding issues can be stressful. The member of staff should, therefore, consider seeking support for him/herself and discuss this with the Designated Teacher.

8.4 Children who are abused, witness violence or are at risk of radicalisation may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. When at school, their behaviour may be challenging and defiant, or they may be withdrawn. The school will endeavour to support any such pupil through:

- the content of the curriculum;
- the school behaviour policy, which ensures that each pupil knows that some behaviour is unacceptable but that s/he is valued and not to be blamed for any abuse that has occurred;
- liaison with other services' and

- procedures to ensure that, when a pupil on the Child Protection Register leaves, the relevant information is transferred to the new school immediately and the pupil's social worker informed.

## 9. **CONFIDENTIALITY**

- 9.1 Safeguarding children raises issues of confidentiality that must be clearly understood by all staff in schools.
- All staff in schools, both teaching staff and support staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police).
  - If a child confides in a member of staff or volunteer and requests that the information is kept secret, it is important that the member of staff or volunteer tell the child sensitively, in a manner appropriate to the child's age and development, that he or she cannot promise complete confidentiality. The adult must explain that he or she may need to pass information to other professionals to help keep the child or other children safe. This will ultimately be in the best interests of the child.
  - Members of staff or volunteers who, in the course of their work, receive information about children and their families, should share that information within appropriate professional contexts only.

## 10. **COMMUNICATION WITH PARENTS**

- 10.1 The school will ensure the Child Protection Policy is available publicly on the school website and in hard copy from the school office.
- 10.2 Parents will be informed prior to Child Protection contact, unless it is considered to do so might place the child at increased risk of significant harm by:
- The behavioural response it prompts e.g. a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed.
  - Leading to an unreasonable delay.
  - Leading to the risk of loss of evidential material.

(The school may also consider not informing parent(s) where this would place a member of staff at risk).

- 10.3 The school will ensure that the parents have an understanding of the responsibilities placed on the school and staff for safeguarding children.
- 10.4 Where reasonably possible the school will hold more than one emergency contact number for their students.

## 11. **ALLEGATIONS OF ABUSE MADE AGAINST ADULTS WHO WORK WITH CHILDREN AND YOUNG PEOPLE**

- 11.1 An allegation is any information that indicates that a member of staff or volunteer may have:
- behaved in a way that has, or may have, harmed a child;
  - possibly committed a criminal offence against/related to a child; and
  - behaved toward a child or children in a way which indicates he or she would pose a risk of harm if he or she were to work regularly or closely with children.

This applies to any child with whom the member of staff or volunteer has contact in his or her personal, professional or community life.

- 11.2 To reduce the risk of allegations, all members of staff should be aware of safer working practice and should be familiar with the September 2015 guidance contained in the Staff Handbook and School Code of Conduct.
- 11.3 The person to whom an allegation is first reported should take the matter seriously and keep an open mind. He or she should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.
- 11.4 Actions to be taken include making an immediate written record of the allegation using the informant's words, including time, date and place where the alleged incident took place, with brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Headteacher.
- 11.5 If the concerns are about the Headteacher, then the Chair of Governors should be contacted. In the absence of the Chair of Governors, the Vice Chair should be contacted.
- 11.6 The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.
- 11.7 The Headteacher will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (07920 283106 / 07795 288271 / 01992 556986). If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the Local Authority Designated Officer without delay.
- 11.8 If it is decided that the allegation meets the threshold for safeguarding, this will take place in accordance with section 4.1 of the **Hertfordshire Safeguarding Children Partnership Inter-agency Child Protection and Safeguarding Children Procedures**.
- 11.9 If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the school's internal procedures.
- 11.10 The Headteacher should, as soon as possible, **following briefing** from the Local Authority Designated Officer inform the subject of the allegation.
- 11.11 **Concerns that do not meet the 'harm threshold'**

Loreto College may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our code of conduct policy – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

- Loreto /College has an open and transparent culture in which all concerns about all adults working in or on behalf of the school/college are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school/college are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
- A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school/college may have acted in a way that is inconsistent with our staff behaviour policy/code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is

- otherwise not serious enough to consider a referral to the LADO.
- Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially in line with our code of conduct policy to Mrs Lynch, Headteacher.
- Where low-level concerns are reported to the school/college, the headteacher/principal will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
- Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
- If the school/college is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
- Where a pattern is identified, the school/college will implement appropriate action, for example reviewing the LADO threshold and completing a referral if harm test met.

11.12 For **further information see**

Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 Managing Allegations Against Adults who work with Children and Young People

12. **MONITORING AND REVIEW**

- 12.1 The Leadership Team will devise and employ a scheme of control to monitor the implementation of this policy and will report to the relevant Governors' committee any significant problems. The Headteacher will demonstrate to the relevant Governors' committee that the scheme is an efficient and effective use of management resources, and will give an annual assurance that the necessary controls have been properly carried out. The Governors will review the policy regularly as part of their programme of policy review and may consult with students, staff and parents in this process.
- 12.2 The policy will be reviewed annually by the Governing Body. It will be implemented through the school's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the Designated Safeguarding Lead and through staff performance measures.

## APPENDIX 1

### STATUTORY FRAMEWORK

In order to safeguard and promote the welfare of children, the school will act in accordance with the legislation and guidance listed below.

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (Section 175/157)  
*Outlines that Local Authorities and School Governing Bodies have a responsibility to “ensure that their functions relating to the conduct of school are exercised with a view to safeguarding and promoting the welfare of children who are its pupils”.*
- Hertfordshire Safeguarding Children Partnership Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)
- Keeping Children Safe in Education (DfE, September 2023)
- The Education (Pupil Information) (England) Regulations 2005
- Sexual Offences Act (2003)
- Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty guidance updated September 2023)
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to **marry**. **Includes** taking someone overseas to force them to **marry** (whether or not the **forced marriage** takes place).
- Serious Violence Strategy 2018

“Working Together to Safeguard Children” (HM Government 2018) requires all schools to follow the procedures for protecting children from abuse and neglect which are established by the Hertfordshire Safeguarding Children Partnership. Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or is at risk of abuse. These procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse.

“Safeguarding Children and Safer Recruitment in Education” places the following responsibilities on all schools.

- Schools should be aware of and follow the procedures established by the Hertfordshire Safeguarding Children Partnership
- Staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions
- Schools should have procedures (of which all staff are aware) for handling suspected cases of abuse of pupils, including procedures to be followed if a member of staff is accused of abuse, or suspected of abuse
- A Designated Safeguarding Lead should have responsibility for co-coordinating action within the school and liaising with other agencies
- Staff with designated responsibility for child protection should receive appropriate training

**“Safeguarding Children and Safer Recruitment in Education” (DfES 2006) also states that “All parents need to understand that schools and FE colleges have a duty to safeguard and promote the welfare of children who are their students, that this responsibility necessitates a child protection policy and procedures, and that a school or FE college may need to share information and work in partnership with other agencies when there are concerns about a child’s welfare.”**

Keeping Children Safe in Education (DfE 2023) also states:

Governing bodies and proprietors should ensure there is an effective child protection policy in place together with a staff behaviour policy (code of conduct). Both should be provided to all staff – including temporary staff and volunteers – on induction. The child protection policy should describe procedures which are in accordance with government guidance and refer to locally agreed inter-agency procedures put in place by the LSCB, be updated annually, and be available publicly either via the school website or by other means.

## **APPENDIX 2**

### **SCHOOL POLICIES RELATING TO SAFEGUARDING**

Anti-Bullying  
Behaviour and Attendance  
Drug Education  
Equal Opportunities  
Extended Curriculum  
First Aid  
Health and Safety  
E-safety  
Online safety policy  
P.S.H.E.  
Racial Equality  
Recruitment  
Sex Education  
Use of Force and Restraint  
Whistleblowing



### APPENDIX 3

#### MORE DETAILED RESPONSIBILITIES OF THE GOVERNING BODY

In particular, the Governing Body must ensure:

- their contribution to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified;
- ensuring that an effective child protection policy is in place, together with a staff behaviour policy;
- ensuring staff are provided with Part One of Keeping Children Safe in Education (DfE 2022) – Appendix 1 and are aware of specific safeguarding issues;
- ensuring that staff induction is in place with regards to child protection and safeguarding;
- appointing an appropriate senior member of staff to act as the Lead Designated Safeguarding Lead. It is a matter for individual schools and colleges as to whether they choose to have one or more Deputy Designated Safeguarding Lead;
- ensuring that all of the Designated Safeguarding Leads (including deputies) should undergo formal child protection training every two years (in line with HCSP guidance) and receive regular (annual) safeguarding refreshers (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments);
- prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns;
- should ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum;
- ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. Additional information to support governing bodies and proprietors is provided in Annex B of **Keeping Children Safe in Education (DFE 2022)**; and.
- Having a senior board level lead to take leadership responsibility for the organisation's safeguarding arrangements.
- Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements
- All governors will read Keeping Children Safe in Education in its entirety, and review compliance of this task at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
  - Reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

## APPENDIX 4

### WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED: ADVICE FOR PRACTITIONERS (DfE 2015)

#### Flowchart

### Be alert

- Be aware of the signs of abuse and neglect
- Identify concerns early to prevent escalation.
- Know what systems the school have in place regarding support for safeguarding e.g. induction training , staff behaviour policy / code of conduct and the role of the Designated Safeguarding Lead (DSL) .

### Question behaviours

- Talk and listen to the views of children, be non - judgemental.
- Observe any change in behaviours and question any unexplained marks / injuries
- To raise concerns about poor or unsafe practice , refer to the HT or principal, if the concerns is about the HT or Principal, report to Chair of Governors. Utilise whistleblowing procedure.

### Ask for help

- Record and share information appropriately with regard to confidentiality
- If staff members have concerns, raise these with the school's or college's Designated Safeguarding Lead (DSL)
- Responsibility to take appropriate action, do not delay.

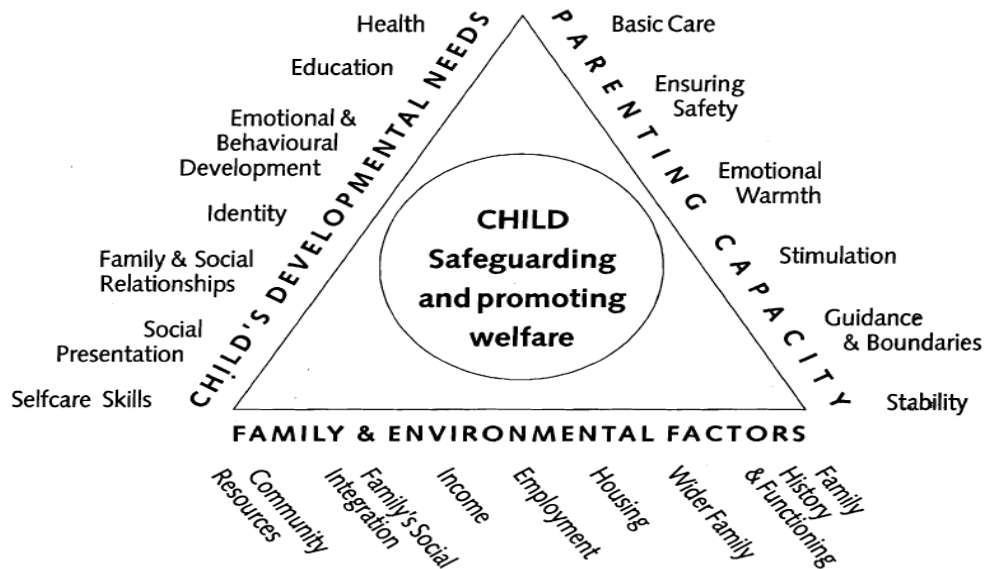
### Refer

- DSL will make referrals to children services but in an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to Children's Services on 03001234043 .

## APPENDIX 5

### INDICATORS OF ABUSE AND NEGLECT

The framework for understanding children's needs:



*Working Together to Safeguard Children (DFE, 2018)*

<b>Physical abuse</b>	
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.	
<b>Child</b>	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size Burns and Scalds – shape, definition, size, depth, scars	Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injurie	Fabricated or induced illness -
<b>Parent</b>	<b>Family/environment</b>
Parent with injuries	History of mental health, alcohol or drug misuse or domestic violence.

Evasive or aggressive towards child or others	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Explanation inconsistent with injury	Marginalised or isolated by the community.
Fear of medical help / parents not seeking medical help	Physical or sexual assault or a culture of physical chastisement.
Over chastisement of child	

### Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent 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 over protection 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 cyber bullying), 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, though it may occur alone.

### Child

Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner' Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour

### Parent

### Family/environment

Observed to be aggressive towards child or others	Marginalised or isolated by the community.
Intensely involved with their children, never allowing anyone else to undertake their child's care.	History of mental health, alcohol or drug misuse or domestic violence.
Previous domestic violence	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
History of abuse or mental health problems	Past history in the care of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Mental health, drug or alcohol difficulties	Wider parenting difficulties
Cold and unresponsive to the child's emotional needs	Physical or sexual assault or a culture of physical chastisement.
Overly critical of the child	Lack of support from family or social network.

## 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.

## Child

Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships
<b>Parent</b>	<b>Family/environment</b>
Failure to meet the child's basic essential needs including health needs	Marginalised or isolated by the community.
Leaving a child alone	History of mental health, alcohol or drug misuse or domestic violence.
Failure to provide adequate caretakers	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Keeping an unhygienic dangerous or hazardous home environment	Past history in the family of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Unkempt presentation	Lack of opportunities for child to play and learn
Unable to meet child's emotional needs	Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
Mental health, alcohol or drug difficulties	

## 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.	
<b>Child</b>	
Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in school work habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	
<b>Parent</b>	<b>Family/environment</b>
History of sexual abuse	Marginalised or isolated by the community.
Excessively interested in the child.	History of mental health, alcohol or drug misuse or domestic violence.
Parent displays inappropriate behaviour towards the child or other children	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Conviction for sexual offences	Past history in the care of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Comments made by the parent/carer about the child.	Grooming behaviour
Lack of sexual boundaries	Physical or sexual assault or a culture of physical chastisement.

### Child on Child abuse

**All** staff should be aware that children can abuse other children and that it can happen both inside and outside of school or college and online. **All** staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

**All** staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their DSL (or DDSL).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example 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, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault. (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be 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
- consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>11</sup> (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

In order to minimise the risk of child-on-child abuse the school:

- Provides a developmentally appropriate PSHE and RSE curriculum which develops pupils’ understanding of acceptable behaviour and keeping themselves safe. (School to add examples here)
- Have systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued. (Schools examples should be listed here)
- Ensure victims, perpetrators and any other child affected by child-on-child abuse will be supported
- Develops robust risk assessments where appropriate (e.g. Using the Risk Assessment Management Plan and Safety and Support Plan tools).
- Have relevant policies in place (e.g. behaviour policy).

Where there is an allegation or concern that a child has abused others, Section 5.1.7 of the Hertfordshire Safeguarding Children Partnership Procedures Manual, ‘Children Who Abuse Others’: [http://hertsscb.proceduresonline.com/chapters/p\\_chil\\_abuse.html](http://hertsscb.proceduresonline.com/chapters/p_chil_abuse.html)

### **Child-on-child sexual violence and sexual harassment**

- When responding to concerns relating to child-on-child sexual violence or harassment, School/College will follow the guidance outlined in Part five of KCSIE 2022.
- School/College recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of ‘it could happen here.’ We recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, 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, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school/college will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
- School/College recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils/students that avoids alarming or distressing them.

- School/College recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- The DSL (or DDSL) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
- The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2022 and HSCP procedures.
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the school/college and where necessary will be referred to Children's Services and/or the police.

**Important considerations which may influence this decision include:**

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children.
- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other children, adult students, or school/college staff
- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The school/college will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Services and/or the police) to ensure a consistent approach is taken.

Hertfordshire County Council recommends that education settings use The Sexual Behaviours Traffic Light Tool by the Brook Advisory Service to help professionals; assess and respond appropriately to sexualised behaviour. The traffic light tool can be found at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

Guidance on responding to and managing sexting incidents can be found at: [http://www.thegrid.org.uk/info/welfare/child\\_protection/reference/index.shtml#sex](http://www.thegrid.org.uk/info/welfare/child_protection/reference/index.shtml#sex)

**All** staff should be 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, 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;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as nudes and semi-nudes; and
- initiation/hazing type violence and rituals.

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

In order to minimise the risk of peer on peer abuse the school:

- Provides a developmentally appropriate PSHE and RSE curriculum which develops students understanding of acceptable behaviour and keeping themselves safe.
- Have systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued.
- Develops robust risk assessments where appropriate (e.g. Using the Risk Assessment Management Plan and Safety and Support Plan tools).
- Have relevant policies in place (e.g. behaviour policy).

**Where there is an allegation or concern that a child has abused others Section 4.4 of the Hertfordshire Safeguarding Children Partnership, ‘Children Who Abuse Others’:**

[http://hertsscb.proceduresonline.com/chapters/p\\_chil\\_abuse.html](http://hertsscb.proceduresonline.com/chapters/p_chil_abuse.html)

**Staff should also refer to Part 5 of Keeping Children Safe in Education (DfE 2022) – ‘Child on child sexual violence and sexual harassment’:**

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

**Staff should also refer to Part five of Keeping Children Safe in Education (DfE 2023 – ‘Child on child sexual violence and sexual harassment’:**

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

### **Serious violence**

**All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. Also refer to Schools Toolkit the characteristics of young peoples vulnerability to CSE and CCE on the HFGL.**

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts/new possessions.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in Annex B KCSiE DfE 2022.

## **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriate trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy and speaking to the schools DSL.

## **Prevent: Safeguarding Children and Young People from Radicalisation**

Children can be vulnerable to extreme ideologies and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation must be part of all school and college safeguarding approaches.

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism.” Pg 150 KCSiE (DfE 2023).

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children’s behaviour, which could indicate that they may be in need of Prevent support. They must act proportionately to the concern using the Prevent ‘notice, check, share’ approach, which may lead to the DSL making a Prevent referral.

Local Hertfordshire County Council guidance on Prevent is featured at 6.25 of the Hertfordshire Safeguarding Children’s Partnership CP procedures

[https://hertsscb.proceduresonline.com/chapters/p\\_prevent\\_guide.html](https://hertsscb.proceduresonline.com/chapters/p_prevent_guide.html)

Which outlines the specific duties in Hertfordshire. This guidance also features advice on making a Prevent referral.

## **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. See Appendix 4 for information regarding Operation Encompass.

## **APPENDIX 6**

### **COUNTY LINES**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

## **APPENDIX 7**

### **MENTAL HEALTH**

All staff at Loreto College 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.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the Designated Safeguarding Lead or a deputy.

## Appendix 8

### Online safety and filtering

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education 2023:

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.

**Contact** – being subjected to harmful online interaction with other users, such as pressure from another child(ren), commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**Conduct** – personal online behaviour that increases the likelihood of, or causes harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

- To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- We will also:
  - Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year
- Educate parents/ carers about online safety via our website and communications sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present.
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras.

- Make all pupils, parents/ carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/ carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. (If you don't have a separate online safety policy document that covers your filtering and monitoring procedures in detail, include them here. See our model online safety policy for a guide of what to cover).
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.
- This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website [www.loreto.herts.sch.uk](http://www.loreto.herts.sch.uk). As mentioned above, if you do not have these separate policy documents, include your policies here and remove this paragraph.
- The link to the school's Online Safety Policy is [https://loreto.greenhousecms.co.uk/docs/Policies/Online\\_Safety\\_Policy.pdf](https://loreto.greenhousecms.co.uk/docs/Policies/Online_Safety_Policy.pdf)

## **Appendix 9**

### **Keeping children safe during community activities, after-school clubs and tuition**

As a provider Loreto College have a legal duty of care to try to ensure our environment is safe for children who visit in addition to those who already attend our setting.

We may receive an allegation or concern relating to an incident that happened when an individual or organisation were using our school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, Loreto College will follow our safeguarding policies and procedures, including informing the LADO where appropriate.

The governing body will ensure any organisation that hires the school premises is compliant with guidance set out in Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK ([www.gov.uk](http://www.gov.uk)). They will therefore seek assurance that the provider concerned has the appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and will ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these activities are children on the school roll or not.



## **Appendix 10**

### **Concerns that Female Genital Mutilation (FGM) has taken place or a child is at risk of FGM**

Keeping Children Safe in Education (2023) explains that FGM includes ‘all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.’

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

**Any teacher** who either:

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

must immediately report this to the Police, personally on 999. This is a mandatory, statutory duty and teachers will face disciplinary sanctions for failing to meet it. In addition, staff should also discuss the concerns with the DSL to report to Children’s Services, as appropriate.

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, the teacher must report to the DSL and follow local safeguarding procedures to be taken.

Any other member of staff who discovers that FGM has been carried out on a child under 18 must report this to the DSL immediately to ensure local safeguarding procedures are followed.