

CHILD PROTECTION POLICY

for the whole School including EYFS

Policy reviewed by	Marion Wright
Review Date	November 2023
SLT Review Period	Annual
Next SLT Review Date	November 2024
Governor Review Period	December 2023
Governing Committee	Samantha O'Sullivan
Next Governor Review	December 2024

OUR MISSION

WELCOME TO THE PRIDE!



Edge Grove is a leading UK prep school for boys and girls aged 3-13. Whatever their unique heritage and identities, all pupils develop **Integrity**, **Independence** and **Inspiration**.

INTEGRITY

Pupils feel healthy, safe, happy and proud to belong and be a unique part of the Edge Grove community. They enjoy friendship and fun, promote kindness, living and growing in alignment with the following self-elected 16 core Values:

- | | | | |
|------------------|-------------------|---------------|---------------|
| 1. Confidence | 5. Unity | 9. Creativity | 13. Kindness |
| 2. Passion | 6. Responsibility | 10. Integrity | 14. Respect |
| 3. Determination | 7. Risk-Taking | 11. Trust | 15. Humility |
| 4. Diversity | 8. Sportsmanship | 12. Empathy | 16. Tolerance |

INDEPENDENCE

Pupils develop, through child-centred active learning, intellectual, physical and spiritual confidence and independence, self-motivation and agency across a broad range of academic, co-curricular and pastoral activities and experiences. They ask and answer questions, develop curiosity, a Growth Mindset, passion and entrepreneurship.

INSPIRATION

Pupils hone the following transferable, lifelong World Economic Forum skills for future success and personal fulfilment:

- | | |
|--|---|
| 1. Analytical thinking and innovation | 6. Creativity, originality, and initiative |
| 2. Active learning and learning strategies | 7. Leadership and social influence |
| 3. Complex problem-solving | 8. Reasoning, problem-solving, and ideation |
| 4. Critical thinking and analysis | 9. Emotional intelligence |
| 5. Resilience, stress tolerance, and flexibility | 10. Technology design and programming |

Contents

INTRODUCTION	5
POLICY STATEMENT	6
CONCERNS ABOUT A CHILD	7
Definitions of safeguarding and types and signs of abuse	7
PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD	8
Contextual Safeguarding	9
Early Help	9
What staff should do if they have concerns about a child	10
What staff should do if a child is in danger or at risk of harm	10
What staff should do if a child is seen as at risk of radicalisation	10
What staff should do if they discover evidence of Female Genital Mutilation ("FGM")	11
What staff should do if they have concerns that children are at risk from or involved with serious violent crime	11
How should staff respond to an incident of nudes and semi-nudes being shared by pupils	11
What staff should do if a child goes missing from education	12
What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)	12
What staff should do if a child requires mental health support	13
What staff should do if they have concerns about safeguarding practices in the School	13
ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)	13
ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE REGARDING TEACHERS INCLUDING SUPPLY STAFF AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, VOLUNTEERS AND CONTRACTORS)	17
ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS AND CONTRACTED STAFF	20
ARRANGEMENTS FOR DEALING WITH LOW-LEVEL CONCERNS OR ALLEGATIONS (I.E. THAT DO NOT MEET THE HARMS TEST) ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS)	21
SAFER RECRUITMENT	21
MANAGEMENT OF SAFEGUARDING	22
TRAINING	23
All Staff	23
DSL(s)	24

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES	24
THE SCHOOL’S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES	27
Teaching children how to keep safe	27
Relationships Education AND/OR Relationships and Sex Education (“RSE”)	27
Looked after children	27
Arrangements for visiting speakers	28
EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS	28
Disqualification from working in childcare	28
Use of mobile phones, smart watches and cameras	29
DSL for the EYFS	29
Duty to notify ISI	29
APPENDIX 1 –SIGNS AND TYPES OF ABUSE	30
APPENDIX 2 – KEY EXTERNAL CONTACT DETAILS	41
APPENDIX 3 - ACCEPTABLE USE OF MOBILE PHONES, CAMERAS/ RECORDING DEVICES	43
APPENDIX 4 – SAFEGUARDING DURING PERIODS OF SCHOOL CLOSURE INCLUDING PANDEMICS	45

INTRODUCTION

The safeguarding and promotion of the safety and welfare of every pupil at Edge Grove is a paramount aim of the School and is the responsibility of everyone within the School organisation. It is the responsibility of the Governors to ensure not only that appropriate arrangements are in place to support staff in the execution of that responsibility but also that staff have an involvement in the shaping of policies and procedures. This is achieved partly through the development of an ethos in which children feel secure and that their viewpoints are valued; also that they are encouraged to talk and are listened to and partly through the policies and process of safer recruitment and subsequent regular training in safeguarding for all staff, agency staff, peripatetic staff, volunteers and Governors.

We recognise that the School plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role School plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

All children have the right to be protected. People who abuse children can be from any section of society, often appearing quite ordinary, respectable and caring. This makes it very difficult for the children they abuse to be believed. Within a professional, close society such as Edge Grove, where people dedicate their lives to caring for and educating children, it can be difficult to appreciate that some people might neglect or seek to harm children, even their own, or to use them for their own sexual gratification. Teachers and other School staff are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop, because they have daily contact with the pupils. The School recognises its important role in the early recognition of the signs and symptoms of abuse or neglect and the appropriate referral processes. The Deputy Head (Pastoral) ensures that arrangements are made to safeguard and promote the welfare of all pupils at the School and that such arrangements both comply with statutory requirements and also have due regard to any further guidance issued by the Secretary of State.

The aim of this policy is to provide a focus that will minimise harm, or risk of harm, and specify the actions required to be taken in response to various situations, in the form of clear procedures of which all staff must be made fully aware. All members of staff have a responsibility to ensure that children in their care are not harmed. There is no legal duty to report suspicions of abuse, however, there is a professional obligation to do so, and in extreme cases a lack of action could constitute criminal neglect.

All members of staff have a duty to safeguard our pupils' welfare and therefore familiarise themselves and comply with this policy, at all times. This includes a duty both to children in need and to children at risk of harm. All staff should read at least Part 1 of KCSIE and School leaders and those staff that work directly with children should also read Annex B which contains important additional information about specific forms of abuse (also in Appendix 1) and safeguarding issues and Part 5 which contains information about child on child sexual violence and sexual harassment. The School has a duty to ensure that mechanisms are in place to assist staff to understand and discharge their roles and responsibilities as set out in this guidance. All members of staff should be aware that safeguarding incidents can happen at any time and in any location and are required to be alert to any possible concerns.

The policy follows DfE, IAPS and HSCB guidelines with the specific objectives of:

- Informing all staff, parents and governors about the School's responsibilities
- Enabling everyone to have a clear understanding of how these responsibilities should be carried out
- Implementing, as necessary, the procedures contained in the HSCB Child Protection Procedures – a guide to procedure and practise for all professional staff in Hertfordshire who work with children
- Adhering strictly to the School's policy on Safer Recruitment which itself complies with the Independent School Standards Regulations and the external policies and references noted above.
- Assessing the likelihood of pupils being drawn into terrorist organisations including extremist ideas, to demonstrate an understanding of the risks and how to identify children who may be at risk of radicalisation and what to do to support them.

The policy covers all types of abuse – physical, emotional, sexual and neglect (see definitions and indicators of abuse at Appendix 1). The School covers Counter-Bullying in its Behaviour policy. The policy includes consideration of the requirement to safeguard and promote the welfare of children who are in need as defined by the Children's Act 1989. The policy includes guidance on the Prevent Duty required of all Schools under the Counter-Terrorism and Security Act 2015.

The policy is reviewed regularly and updated and amended as necessary in light of variations to regulation, legislation or best practice and will, in particular, be formally reviewed by the Designated Safeguarding Lead (see below) following the discovery of any Child Protection issue with any deficiencies or weaknesses being remedied immediately without delay.

The School's Local Safeguarding Children Executive is the Herts Safeguarding Children Partnership (HSCP). A full copy of their local procedures can be found at <https://hertsscb.proceduresonline.com>.

The policy has been drawn up in accordance with the Hertfordshire locally agreed inter-agency procedures and the School works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

The full Governing Body undertakes an annual review of School policies and procedures relating to Child Protection along with the efficiency of their execution. This review is formally and comprehensively minuted. This review may be undertaken by an outside expert on behalf of the Governing Body.

It should be noted that:

- i) The policy extends to off-site accommodation arranged by the School (e.g. for residential trips)
- ii) For the purpose of this policy the term "staff" includes all volunteers and temporary/agency staff whether directly employed by the School or through a contractor

POLICY STATEMENT

This policy applies to Edge Grove School Trust Ltd ("the School"), which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) by the Deputy Head (Pastoral) and is available on the School website.

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (September 2023) ("*KCSIE*")
 - o Disqualification under the Childcare Act 2006 (September 2018)
 - o What to do if you're worried a child is being abused: advice for practitioners (March 2015)
 - o Sexual Violence and Sexual Harassment Between Children in Schools and Colleges advice (September 2021) ("*SVSH*")
- Working Together to Safeguard Children (2018) ("*WT*")
 - o Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (April 2021)
 - o The Prevent Duty: Departmental advice for schools and child care providers (August 2015)
 - o The use of social media for on-line radicalisation (July 2015)
- Relationships education, relationships, and sex education (RSE) and health education (July 2020)
- The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020)
- The Charity Commission guidance Safeguarding and protecting people for charities and trustees (October 2019)

This policy also takes into account the procedures and practice of Hertfordshire Safeguarding Children's Partnership's (HSCP) as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Executive.

CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole School' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of education and policy development.

The School encourages parents to raise concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. Details of these arrangements are contained within the 'Circle of Care' and 'Do You Need Help or Support' posters available in pupil planners, in classrooms and corridors throughout the School. It is important that all pupils feel that they can share concerns with a trusted adult. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Staff endeavour to reduce additional barriers by providing a safe space for pupils to speak out or share their concerns with members of staff.

Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to prevent harm. Children may be abused in a family, in an institutional or community setting, by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate

offline abuse. They may be abused by an adult, adults or by another child or children. Abuse can be:

- Physical abuse and/or
- Emotional abuse and/or
- Sexual abuse and/or
- Neglect.

Appendix 1 of this policy includes further detail of the types of abuse and possible signs of abuse, as well as further information and definitions regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they act immediately and follow the relevant procedure below. Staff do not assume that somebody else will take action or share information that might be critical in keeping children safe. Staff are aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected and/or they may not recognise their experiences are harmful. This should not prevent staff speaking to the DSL if they have concerns about a child that may not have been verbalised by the child themselves.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

When a child is sharing a concern all staff should:

- Listen carefully
- Avoid asking leading questions
- Reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- Ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report. In cases of child-on-child sexual violence or harassment it is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- Not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

In the first instance, if someone has a safeguarding concern about a child (Cause for Concern) then they should speak to the DSL immediately. In the absence of the DSL they should speak to the DDSL or the Head, unless concerns relate to the Head. Staff record all concerns, discussions, and decisions (together with reasons) made under these procedures should then be recorded in writing using the Child Protection Online Management System (CPOMS). The record should include a clear and comprehensive explanation of the concern, details of how the concern was followed up and resolved as well as a record of any action taken, any decisions reached and the outcome. This information is kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in *KCSIE 2023*.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or deputy DSL).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The Deputy Head (Pastoral) ensures that there are systems in place that are well promoted, easily understood and easily accessible for children to be able to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates these processes with the best interests of the pupil/s at their heart.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. As part of the wider assessment of children, the School will consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

The School will ensure any necessary support is put into place for any siblings following incidents.

Early Help

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending;
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child; and
- Is persistently absent from education, including persistent absences for part of the school day.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL (and where necessary, with the School's SEND lead). The DSL will consider the appropriate action to take in accordance with the Herts Safeguarding Children Partnership (HSCP) referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

What staff should do if they have concerns about a child

Staff do not assume that somebody else will take action and share information that might be critical in keeping children safe; they maintain an attitude of "it could happen here".

If staff (including governors, supply staff, agency staff and volunteers) have concerns about a child (as opposed to a child being in immediate danger), they where possible, speak with the School's DSL or nominated deputy to agree a course of action. Staff can make a direct referral to children's social care, if necessary. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing.

What staff should do if a child is in danger or at risk of harm

If staff believe that a child is in immediate danger or at risk of harm, they make an immediate referral to children's social care (see Appendix 2 for contacts) and/or the Police. Anyone can make a referral and such a referral must be made immediately (within 24 hours, one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge inaction and follow this up with the DSL and children's social care, as appropriate. All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing, on CPOMS.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call the Police. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL, and DDSs and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism, and are regularly revised.

What staff should do if they discover evidence of Female Genital Mutilation ("FGM")

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should inform and discuss any such case with the DSL who will involve children's social care. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL. Where a teacher suspects that a pupil is at risk (i.e. where the member of staff does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) teachers should follow the School's local safeguarding procedures.

If a member of staff, who is not a teacher, discovers (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18 they should immediately speak to the DSL who will call the Police.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff are aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care (see Appendix 2 for contacts).

How staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (for example Snapchat), gaming platforms, chat apps (for example WhatsApp and iMessage) or forums. It could also involve sharing between devices via offline services (for example Apple's AirDrop). The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Staff will take seriously any direct disclosure by a child. The member of staff aims to minimise the child's discomfort and will only ask appropriate questions sensitively, in order to minimise further distress or trauma.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL without delay.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- Carrying out interviews with the children involved (if appropriate)
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The School records the reason for not reporting incidents externally and the Head signs this off. Records will be kept in line with statutory requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained.

The law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

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

What staff do if a child goes missing from education

Children who go missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including abuse, neglect, sexual abuse, and child sexual and/or criminal exploitation. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of children going missing in the future. The School's procedures for unauthorised absence and for dealing with children who go missing from education are detailed in the School's Children Missing Education Policy. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult, particularly when the child missing from education is also identified as a welfare and/or safeguarding concern.

The School will report to Hertfordshire County Council Attendance Team (see Appendix 2) a pupil who fails to attend school regularly or has been absent from school without permission for a continuous period of 10 school days or more.

What staff do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities share the fact that a child has a social worker, and the DSL uses this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

What staff do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

A number of staff have completed Mental Health First Aid training and use this to support pupils. If a significant concern is raised, it should be reported to the relevant Pastoral Head of Department and/or another member of the SLT immediately who can decide the appropriate course of action in conjunction with the parents of the child.

The school recognises the link between mental health, school attendance and children 'absent from education' and will act appropriately to minimise the impact on learning, progress, and educational attainment.

If staff have a mental health concern about a child which is also a safeguarding concern, they should take immediate action, following the procedures in this policy and speaking to the DSL.

What staff do if they have concerns about safeguarding practices in the School

The School aims to ensure a culture of openness and transparency in raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, they raise these in accordance with the School's whistleblowing procedures which can be found in the shared Google Drive, Edge Grove School Policies. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline are in Key Contacts in Appendix 2.

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

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of School, and/or online. It manifests itself in many ways and can include:

- Abuse within intimate partner relationships
- Bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- Physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm)
- Initiation/hazing type violence and rituals
- Upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault
- Gender-based issues
- Sexual behaviours including child on child sexual violence and sexual harassment
- 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.

These arrangements will apply to all reports and concerns of child on child abuse, whether they have happened in or outside School, and/or online. Abuse that occurs online or outside school will not be downplayed and will be treated equally seriously. Staff immediately speak to the DSL or nominated deputy if they suspect child on child abuse. All record keeping related to child on child abuse is recorded on CPOMS.

The Deputy Head (Pastoral)/DSL regularly reminds pupils who they can speak to if they are worried about anything through the Edge Grove Circle of Care, displayed in every classroom and pupil areas (e.g. toilets and changing rooms).

Staff address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions are never passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is not being reported. The Deputy Head (Pastoral)/DSL ensures that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. The Deputy Head (Pastoral)/DSL promotes these procedures in a format that is easily accessible and easily understood by pupils. The School acknowledges that it is more likely that girls will be victims and boys perpetrators, but recognises that all child on child abuse is unacceptable and takes it seriously.

The School recognises that a child is likely to disclose an allegation to someone they trust; this could be any member of staff. By making such a disclosure, the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that pupils may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice. Some incidents may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to child on child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children and their peers. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School takes the following steps to minimise the risk of child on child abuse through our Mission, Values, other pastoral activities and PSHE, encouraging empathy and tolerance amongst all pupils.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff follow the procedures below rather than the School's Behaviour policy [which includes Counter-Bullying]:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the HSCP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the HSCP parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the HSCP. The School will have regard to the procedures set out in *KCSIE* and the *SVSH* at all times.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the DSL will explain the reasons to the pupil and offer appropriate specialist support. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the HSCP referral process.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child on child abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the Safeguarding Team and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and

- all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised.

The DSL will assess the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This risk assessment includes careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will keep a written record of all concerns, discussions, decisions and risk assessment on CPOMS.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE REGARDING TEACHERS INCLUDING SUPPLY STAFF AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, VOLUNTEERS AND CONTRACTORS)

The School's procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and HSCP arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations that do not meet the above harms test will be dealt with using the School's procedure for handling Low Level concerns set out in the Low Level Concerns Policy found on the School Google Drive.

Allegations against a teacher who is no longer teaching will be referred to the Police. Historical (non-recent) allegations of abuse will be referred to the Police and also the LADO (Local Authority Designated Officer). Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the Police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School will not undertake their own investigation of the allegation/s without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

When dealing with allegations about a staff member the School will apply common sense and judgement, quickly, fairly, and consistently, and the School will support the person subject to the allegation.

1. Allegations which appear to meet the above reporting criteria are reported straight away to the 'case manager' who is the Head. Where the Head is absent or is the subject of the allegation or concern, reports are made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and designated officer. However, staff may consider discussing concerns with the DSL and may make any referral via them.
2. The case manager will immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation, agreeing a course of action. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager will contact children's social care and the Police immediately.) All

discussions will be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer will be informed within one working day of all allegations that come to the School's attention and meet the criteria or that are made directly to the Police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the designated officer and make a risk assessment of the situation. It may be necessary for the designated officer to make a referral to children's social care.
4. The appropriate time to inform the individual, who is the subject of the allegation will be considered on a case by case basis and with guidance from the designated officer, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager will give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. Suspension will not be an automatic response when an allegation is reported. It will be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the designated officer, *WT* and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.
6. Where further enquiries are required to enable a decision about how to proceed, the designated officer and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
7. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
9. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made

where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

10. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the designated officer will record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCS/IE* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records will be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS AND CONTRACTED STAFF

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies will be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

The School will only cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This will include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the School will consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

ARRANGEMENTS FOR DEALING WITH LOW-LEVEL CONCERNS OR ALLEGATIONS (I.E. THAT DO NOT MEET THE HARMS TEST) ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS)

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously. It recognises that addressing low-level concerns is important to create and embed a culture of openness, trust, and

transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced, by all staff.

The School's code of conduct can be found in the shared Google Drive, Edge Grove School Policies. The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Staff must share all concerns with the Head or Senior Deputy Head without delay. The concern will be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. If the low-level concern relates to the Head, it should be shared with the Chair of Governors.

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

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), the individual involved and any witnesses. The concern will be recorded and kept securely.

The School will address unprofessional behaviour promptly and will support the individual to correct it.

Further detail on Low-Level Concerns, including record keeping, can be found in the Low-Level Concern Policy. Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

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

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with Head or Senior Deputy Head just as they would for any other member of staff or volunteer. The concern will be recorded in accordance with the School's low-level concern, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example,

right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, online checks, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. If the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment, Selection and Disclosures Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Recruitment, Selection and Disclosures Policy.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Marion Wright who is a member of the leadership team and also Deputy Head (Pastoral).

Leanne Simmonds and Jo Leighton are the Deputy DSLs (DDSLs) and the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times. Richard Stanley and Ed Balfour are additionally trained to DSL level.

The DSL and DDSL's contact details can be found on the Key Contacts page at the end of this policy.

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

When a pupil leaves the School, including for in-year transfers, the DSL will ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL will also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices concerning all safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of appropriate action, directly to local children's services.

The DSL, in conjunction with the Head, prepares a termly report to governors regarding the management of safeguarding. In the summer term the Deputy Head (Pastoral) also completes an Annual Safeguarding Review for the governors.

During term, the DSL and/ or a DDSL will always be available (during School hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in

person, they can be contacted on the phone. For out of hours/out of term activities, the School's arranges for one of the DSL or DDSLs and/or the Head to be available.

The DSL or Deputy DSL should liaise with its safeguarding partners and work with other agencies in line with *WT*. "[NSPCC - When to call the police](#)" can assist the DSL or Deputy DSL understand when they should consider calling the police and what to expect when they do. The DSL or DDSL will also be responsible for liaising with the senior mental health lead and, where available, the local authority Mental Health Support Team, where safeguarding concerns are linked to mental health.

Whilst the Head ensures that policies and procedures adopted are understood and followed by all staff, the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

TRAINING

Induction and training are in line with advice from Hertfordshire Safeguarding Children Partnership.

All Staff

The School will provide all new staff with induction training that includes:

- The child protection policy (including the policy and procedures to deal with child on child abuse);
- The role and identity of the DSL and any DDSLs
- The behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- The staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media
- On-line safety
- The safeguarding response to children who go missing from education;
- A copy of Part one of *KCSIE* at least (or, for staff that do not work directly with children, Annex A)
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE* and *Part five of KCSIE*.

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are provided with:

- The child protection policy (including the policy and procedures to deal with child on child abuse);
- The role and identity of the DSL and any DDSLs
- A copy of Part one of *KCSIE* at least (or, for staff that do not work directly with children, Annex A)

All staff are also required to:

- Read at least Part one of *KCSIE* (or, for staff that do not work directly with children, Annex A) and confirm that they have done so. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via Safeguarding INSET and an online training platform.

- Understand key information contained in Part One (or, for staff that do not work directly with children, Annex A) of *KCSiE*. The School will ensure staff understanding by the mandatory training on an online platform.
- Take part in training in safeguarding and child protection regularly, in line with advice from HSCP. Training will include online safety and harmful sexual behaviours (including child-on-child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, emails, e-bulletins, INSET or staff meetings.

Staff read this and any other related policies when new to the School or whenever they are changed, declaring that they will adhere to the procedures within it.

DSL(s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the HSCP's approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSiE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSs and Head are trained to the same level as the DSL.

Governors

The governing body ensures that all governors receive appropriate safeguarding and child protection (including online) training at induction and is regularly updated. This training equips governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

We recognise Our Governing body has a strategic leadership responsibility for our school's safeguarding arrangements and comply with their duties under legislation regarding *KCSiE* 2023, ensuring policies, procedures and training in School are effective and comply with the law at all times.

The School recognises its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their

implementation, including lessons learnt. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority Designated Officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

The governing body is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the School's ethos and reflected in the School's day to day safeguarding practices by:

- Ensuring there is an individual member of the governing body to take leadership responsibility for safeguarding and champion child protection issues in the School. This is currently Samantha O'Sullivan, a qualified teacher;
- Ensuring that the School has effective policies and procedures in line with statutory guidance (Working Together to Safeguard Children 2018, updated December 2020) as well as with local NSCP guidance and monitors the school's compliance with them;
- Ensuring that safeguarding policies and procedures are in place for appropriate action to be taken in a timely manner to promote a child's welfare;
- Recognising the importance of information sharing between agencies through the statutory guidance provided within KCSiE;
- Ensuring cooperation with the local authority and other safeguarding partners;
- Appointing a Senior Designated Safeguarding Lead from the leadership team to take lead responsibility for child protection/safeguarding and that a Designated Teacher for Looked After Children is appointed and appropriately trained;
- Ensuring that all staff, supply teachers and governors read and fully understand at least KCSiE 2023 Part One and or Annex A as a minimum and ensure that there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as required within the guidance;
- Ensuring that the governing body understands it is collectively responsible for the School's safeguarding arrangements, even though a governor will be nominated as the 'Safeguarding Governor' and person who will champion all safeguarding requirements;
- All members of the governing body will undertake safeguarding training to ensure they have the knowledge and information needed to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of robust 'safeguarding arrangements and act as the 'critical friend'. This training must focus on their strategic role and not on operational procedures;
- The Chair of Governors and named Safeguarding Governor will access role specific training to enable them to comply and discharge their child protection/safeguarding responsibilities including should any allegations be made against the Head;

- The Governing body will collectively ensure there is a training strategy in place for all staff, including the Head, so that child protection training is undertaken and refreshed in line with KCSiE;
- Ensuring that staff undergo safeguarding child protection training at induction and that there are arrangements in place for staff to be regularly updated to ensure that safeguarding remains a priority;
- Ensuring that temporary staff and volunteers who work with children are made aware of the School's arrangements for child protection and their responsibilities;
- Ensuring there are procedures in place to manage allegations against staff and exercise disciplinary functions in respect of dealing with a complaint KCSiE 2023 Part Four Section One;
- Ensuring that arrangements/procedures are in place to manage and provide clarity on the process for sharing 'low level' concerns, which should be referred to within the Staff Code of Conduct, (Allegations and concerns about a staff member that after initial consideration by the 'case manager' do not meet the criteria for a referral to LADO);
- Ensuring when making a referral to the LADO Service a LADO referral form is fully completed;
- Ensuring a response if there is an allegation against the headteacher/principal by liaising with the LADO or other appropriate officers within the local authority;
- Ensuring appropriate filters and monitoring systems are in place to protect children online and children learn about keeping safe online through the curriculum;
- When the School premises are used for non-school activities the Governing body/trust will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place, and inspect them as needed, including liaising with the Head. This will apply regardless of whether or not children who attend the provision are on the School roll;
- Any safeguarding concerns involving outside organisations will be addressed through our school/college safeguarding policies and procedures;
- Preventing people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, making decisions about additional checks and ensuring volunteers are supervised as required;
- Ensuring at least one person on an interview panel has completed safer recruitment training;
- Informing any new prospective employee candidates that our School will carry out online social media checks (KCSiE 2023 Part Three Safer Recruitment);
- Recognising that certain children are more vulnerable than others, such as looked after children and children with special educational needs and disabilities;
- Being open to accepting that child abuse and incidents can happen within the School and be available to act decisively upon them;

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children build resilience for circumstances both inside and outside of School, in order to reduce risks, including radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet, and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's IT curriculum and also embedded in PSHE and Relationships Education and/or Relationships and Sex Education ("RSE").

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's systems are closely monitored. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials (including advertisements) online; reduce the risk of children being subjected to harmful online interaction with others; restrict access to online risks such as online gambling, phishing or financial scams; and help them understand online behaviour that can increase a child's likelihood of, or causes, harm. The School recognises that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school, undetected. Further detail of the School's policy and procedures in relation to online safety can be found in the School's E-Safety and IT Usage Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems. These systems are reviewed termly.

Staff have an understanding of the expectations, applicable to their roles and responsibilities in relation to filtering and monitoring of IT systems. Regular monitoring of the filtering and monitoring systems takes place.

Relationships Education AND/OR Relationships and Sex Education ("RSE")

The School recognises the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education and/or RSE.

Relationships Education and/or RSE form part of the School's PSHE programme.

Looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Marion Wright, Deputy Head (Pastoral) and DSL is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the Mission and Values of the School and British Values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant. This is overseen by the Educational Visits Coordinator (EVC) (Brian McManus) in collaboration with the Senior Deputy Head (Academic) and/or Deputy Head Pastoral.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence.

The member of staff responsible for the speaker shares with them the safeguarding checklist. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Outside Hires

The School has a responsibility to ensure that any outside hires of the school site (for example sports clubs, holiday camps) have appropriate safeguarding procedures in place, including allegations against adults. If the School becomes aware of concerns regarding the suitability of staff engaged by external providers then the School will contact the LADO.

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

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

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

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

Use of mobile phones, smart watches and cameras

The School's policy on the use of mobile phones, smart watches and cameras in the EYFS setting can be found in the School's IT Usage Policy (see Appendix 3 for details). Staff are not permitted to use their personal mobile devices or cameras in School when in the presence of children. Parents are requested to not use their mobile phones or camera in or around the EYFS setting without prior approval from the Head or DSL.

DSL for the EYFS

Marion Wright, the whole-School DSL, takes responsibility for child protection and safeguarding within the EYFS.

Duty to notify ISI

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

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

Policy updated: November 2023

Marion Wright
Deputy Head Pastoral and DSL

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All School staff are aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues overlap with one another therefore staff should always be vigilant and raise any concerns with the DSL (or deputy).

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of the School environment. All staff, but especially the DSL and deputies, consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

In all cases, if staff are unsure, they should always speak to the DSL.

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 (including through corporal punishment). 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 violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such

as rape, sexual assault, and assault by penetration. The School should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the [SVSH](#) advice.

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

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

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

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

- children and young people find nudes and semi-nudes online and share them claiming to be from another child
- children and young people digitally manipulate an image of a young person into an existing nude online

- images created or shared are used to abuse children e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

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

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

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

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

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

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "[Child sexual exploitation: guide for practitioners](#)".

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

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

Some of the following can be indicators of CCE:

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

- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

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

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

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

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

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

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

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

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

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual

exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "[Modern slavery: how to identify and support victims \(June 2021\)](#)"

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing the School's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, '[NSPCC- When to call the Police](#)' and National Cyber Security Centre - NCSC.gov.uk

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

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

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

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

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting*

Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

So called 'honour based' abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or deputy) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should inform and discuss any such case with the DSL who will involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) teachers should follow the School's local safeguarding procedures.

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

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff

can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads should familiarise themselves with the Prevent duty guidance. Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

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

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as child group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bi or trans ("LGBT"): Children who are LGBT can be targeted by other children. In some cases, a pupil who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or

experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

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

Children who go missing from school: A child going missing from School is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called ‘honour’-based abuse or risk of forced marriage. Staff must follow the School’s procedures for dealing with children who go missing, particularly persistently. The School’s procedure for dealing with children who go missing can be found School’s Children Missing Education Policy. All unexplained absences will be followed up in accordance with this Policy.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of the School can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes

including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

APPENDIX 2 – KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer	TEL: 01992 555420 EMAIL: LADO.Referrals@hertfordshire.gov.uk
Local Authority Children's Social Services / Multi-Agency Safeguarding Hub / Herts Safeguarding Children Partnership	TEL: 0300 123 4043 OUT OF HOURS EMERGENCY DUTY TEAM TEL: 0300 123 4043 EMAIL: admin.hscp@hertfordshire.gov.uk
Local Authority Child Protection Schools Liaison Officer	EMAIL: CPSLOadmin@hertfordshire.gov.uk
Support and Advice about Extremism	<p>Police EMERGENCY: 999 NON EMERGENCY NUMBER: 101</p> <p>Local Authority HCC Prevent Programme Manager TEL: 0777309489 EMAIL: sophie.lawrence@hertfordshire.gov.uk PREVENT LEAD: Sophie Lawrence Anti-Terrorist Hotline (anonymous): 0800 789 321</p> <p>Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk</p>
NSPCC Whistleblowing Advice Line (available Monday-Friday 08:00 – 20:00)	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbb.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk

Independent Schools Inspectorate	TEL: 0207 6000100 EMAIL: concerns@isi.net
Governors	Chair of Governors Howard Claydon TEL: through the School's Bursar EMAIL: hclaydon@edgegrove.com Nominated Safeguarding Governor Samantha O'Sullivan TEL: through the School's Bursar EMAIL: sosullivan@edgegrove.com
Head	Ed Balfour TEL: Ext 220 in School EMAIL: ebalfour@edgegrove.com
Designated Safeguarding Lead ("DSL") {and Deputy Designed Safeguarding Lead ("DDSL")}	All DSLs can be contacted via dsl@edgegrove.com Main DSL for the School Deputy Head Pastoral Marion Wright TEL: Ext 612 in School EMAIL: mwright@edgegrove.com Deputy DSL leanne Simmonds TEL: Ext 249 in School EMAIL: lsimmonds@edgegrove.com Deputy DSL Jo Leighton TEL: 07740199402 or Ext 620 in School EMAIL: jleighton@edgegrove.com
Designated Teacher for Looked After Children	Marion Wright Ext 612 in School EMAIL: mwright@edgegrove.com

APPENDIX 3 - ACCEPTABLE USE OF MOBILE PHONES, CAMERAS/RECORDING DEVICES

This policy applies to all areas of the School but has particular application to the Early Years Foundation Setting.

Mobile Phones

Staff are not permitted to use their personal devices on the School site whilst in the company of the pupils. In the EYFS, all personal devices must be kept in the staff room at all times.

Personal devices are permitted to be used in the following situations:

- As a method of navigating whilst driving a School vehicle, providing appropriate vehicle safety regulations are strictly adhered to;
- On off-site School trips for communicating with other members of staff who are on the trip or for contacting the School site;
- In a situation where the emergency services need to be called

These exclusions DO NOT apply to those working with children in the EYFS. Personal devices are not to be used at all in this phase of the School.

If any staff member has an emergency, which requires them to keep their mobile close at hand, they should consult with the Head or Senior Deputy Head and get permission for this. In this situation, any phone calls taken or made should be done so in a designated staff area of the setting i.e. staff room or office. Permission will not be given to staff working in the EYFS.

School mobile phones will be issued to staff who are leading School trip or who are taking School teams off site for matches. These should be used in the first instance for communicating with the School site.

Cameras

Children should only be photographed or filmed on video for the purpose of recording their development or participation in events organised by us. Parents indicate their consent to the above if they do not opt-out of this as designated in the School's Terms and Conditions of entry. Parents have the right of access to records holding visual images of their child.

- Only a School camera or phone is to be used to take any photo within the setting or on outings. If a School camera is not available, then in exceptional circumstances a personal one may only be utilised subject to advance approval from the DSL/EYDSL or Head who may also check images taken.
- Images taken must be deemed suitable without putting the child in any compromising position that could cause embarrassment or distress
- All staff are responsible for the location of a classroom assigned camera or any equipment capable to taking pictures or videos.
- Images taken and stored on the camera must be downloaded as soon as practicable.
- Images should be downloaded to an approved network folder designated by the IT Manager.
- Images may only be uploaded to the School website by authorised staff and should never be uploaded to the internet for any other reason, including onto social networking sites e.g. Facebook.
- Under no circumstances must cameras of any kind be taken into bathrooms without prior consultation with the DSL/EYDSL, or Head. In this event, staff should be supervised whilst carrying out this activity. At all times the camera must be placed in a prominent place where it can be seen.
- It is the responsibility of all members of staff to be vigilant and report any concerns to the EYDSL, DSL, Senior Deputy Head or Head.

- Any non-compliance will be taken seriously, logged and investigated appropriately in line with our disciplinary policies.

APPENDIX 4 – SAFEGUARDING DURING PERIODS OF SCHOOL CLOSURE INCLUDING PANDEMICS

It is recognised that the School may be involved in an enforced closure due to a critical incident, including a pandemic, resulting in different ways of delivering teaching and learning. Safeguarding children remains the top priority, and being physically isolated from a School setting brings a number of additional challenges and risks. It is therefore imperative that all understand the boundaries of operating on-line and how children communicate with others: including their friends or their teachers.

In these circumstances, the Safeguarding Policy remains in place, but is supported by this Appendix to ensure that staff, pupils and parents are aware of how the Safeguarding Policy is adhered to during any period of enforced closure. At the time of enforced closure, the School will review all relevant advice and guidance including that relating to teaching and learning, health & safety and legal duties.

The School will:

- ensure that staff know how to contact the DSL Team to report a safeguarding concern about a child.
- ensure that staff know how to set up a safe on-line classroom, providing appropriate support.
- ensure that staff have a formal timetable and record contact with parents and pupils through normal channels.
- ensure, in so far as possible, that communications with pupils and parents are within School hours (or hours agreed with the School) and via School senior management approved channels.
- ensure that staff are aware that they must continue to be data compliant and that all new on-line technology has had a privacy impact assessment carried out for approval and that staff will only use approved education programmes and systems that are data protection (DP) compliant.
- ensure staff are trained and updated on the importance of data protection compliance whilst on-line.
- ensure that staff are reminded to only use School registered email accounts.
- ensure that staff are reminded to only use School devices (wherever possible) or approved personal devices.
- ensure that staff are issued with the School's current working from home guidelines for teaching and learning, IT and health & safety.
- ensure that parents and pupils are issued with the current continued academic and pastoral provision responsible user agreement for parents and pupils.
- ensure there are ways for pupils (and parents) to authenticate who is connecting with them on-line.
- keep a record of critical workers' children and vulnerable children who are attending School and have procedures in place to follow up any non-attendance.
- ensure that where there is remote access to the School network, filtering and monitoring is appropriate to the pupil's cohort and age.
- ensure staff, pupils and parents are signposted to the various practical support and guidance available for online safety and how to report concerns.
- hold on-line safety discussions with staff to establish best practice.
- confirm that emergency numbers for parents/carers of vulnerable pupils are up to date and obtain additional emergency numbers where they are available.
- help parents in supporting their children in dealing with technology, digital media, on-line teaching and the associated risks.
- consider what pastoral support can be provided for families to alleviate stress and anxiety at home.

- ensure that policies and protocols/guidelines are reviewed regularly and signed off by appropriate staff and, where appropriate, governors.
- keep Governors advised of changes to policies and practices.
- where changes are made to policies, protocols and guidelines all staff are notified and, if necessary, given top-up training.
- ensure there are appropriate arrangements for the provision of pastoral support to pupils and their families remotely with clear reporting routes for staff, parents and pupils to raise concerns during School closure.
- ensure that arrangements in place to ensure relevant safeguarding information is shared where a pupil temporarily transfers across to/from the School.
- ensure that appropriate vetting and induction arrangements are in place for any new permanent staff, temporary staff and volunteers.