



## SAFEGUARDING POLICY, INCLUDING EYFS (Child Protection) PART I

<b>School update</b>	
Responsible for review of policy	DSL/Deputy Head Pastoral
Last school update	September 2021
<b>Governor Sub-Committee review</b>	
Sub Committee to review	Pastoral
Review Period	At least annually but whenever needed to be kept up to date with emergent safeguarding issues
Last Sub-Committee review date	30 September 2021
Scheduled review	<b>September 2022</b>
Reviewed and referred to Board by Sub Committee – <i>meeting date</i>	30 September 2021
<b>Board Approval</b>	
<b>Approved by Board of Governors (Meeting date)</b>	9th December 2022
Version number	8
Next Sub-Committee/Board Review	May 2022
<b>Related policies</b>	<ul style="list-style-type: none"> <li>Anti-bullying policy</li> <li>Anti-bullying policy – appendix on cyber bullying</li> <li>External Access policy</li> <li>Boarder missing out of school hours</li> <li>Adult partners living in boarding houses</li> <li>Induction of new staff, Governors and volunteers in safeguarding</li> <li>Partners of House Staff</li> <li>Allegations of abuse – staff, volunteer, safeguarding officer or Head</li> <li>Use of force to restrain pupils</li> <li>Girl missing during the school day</li> <li>Girls in staff flats (Boarding staff only)</li> <li>Low Level Concerns policy</li> <li>Supervision of boarding house staff awaiting DBS clearance</li> <li>Supervision of staff friends in boarding houses</li> <li>Supervision of teaching staff awaiting DBS clearance</li> <li>Recruitment policy</li> <li>RMS Staff code of conduct – safer working practice for adults working with children and young people</li> <li>Staff social and E-Media communication policy</li> <li>Taking, storing and using images of children</li> <li>Safeguarding procedures – Nuffield Health</li> <li>Prevent – Strategy for preventing extremism at RMS</li> <li>Whistleblowing.</li> </ul>

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Hertfordshire Safeguarding Children Board	0300 123 4043
Virtual School Head for Hertfordshire, Felicity Evans	01992 555926
Children's Commissioner, Anne Longfield OBE <a href="mailto:advice.team@childrenscommissioner.gsi.gov.uk">advice.team@childrenscommissioner.gsi.gov.uk</a>	0800 528 0731
Hertfordshire Police (eg when FGM is suspected)	101
Local Authority Channel Referral and Intervention processes <a href="mailto:prevent@herts.pnn.police.uk">prevent@herts.pnn.police.uk</a>	
Anti-terrorist hotline	0800 789321
DfE dedicated helpline for advice to staff <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>	020 7340 7264
NSPCC Whistleblowing hotline <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	0800 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285

## TERMINOLOGY AND ABBREVIATIONS

DBS	Disclosure and Barring Service
DSL	Designated Safeguarding Lead
eCAF	Electronic Common Assessment Framework
EYFS	Early Years Foundation Stage
FGM	Female Genital Mutilation
HCS	Hertfordshire Children's Services
HSCB	Hertfordshire Safeguarding Children Board
KCSIE	Keeping Children Safe in Education (2019)
DO	Designated Officer
MASH	Multi Agency Safeguarding Hub
TRA	Teaching Regulation Agency

School The Royal Masonic School for Girls, including Ruspini, Cadogan House, the Boarding Houses and the Senior School

**Staff** covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc, and governors

**Child Protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

**Abuse** is defined as a form of maltreatment of a child. Abuse may take the form of physical, emotional or sexual abuse and includes neglect. The latter may involve actually inflicting harm, or failing to act to prevent harm. Children may be abused by an adult or adults or by another child or children. Abuse can also take place online.

## 1. POLICY STATEMENT

1.1 The welfare of all children (including EYFS) at RMS must be the primary concern for all staff and the School will do all it can to ensure that all pupils are safe and happy, acting in the best interests of the child at all times

1.2 Safeguarding and promoting the welfare of children is everyone's responsibility. In order to fulfil this responsibility effectively, all professionals should make sure that their approach is child centred. This means that staff should consider at all times, what is in the best interests of the child.

1.3 *The Teacher Standards 2014* state that teachers, including headteachers, should safeguard all children's wellbeing and maintain public trust in the teaching profession as part of their professional duties and all staff have a responsibility to take appropriate action, working with other services as needed.

1.4 This policy is approved and endorsed by the Governing Body and applies to all staff and volunteers, wherever they are with pupils whether on or off the School site. Parents are informed of the policy and procedures through the website.

1.5 In order to safeguard and promote the welfare of children, the School will act in accordance with the following legislation and guidance:

1.5.1 *Keeping Children Safe in Education* (September 2021) (KCSIE) The Board of Governors ensures all staff have read and understood their responsibilities as outlined in Part 1 as well as Annex B for those staff working directly with children or Annex A for those staff who are not in direct contact with children as directed by the Board of Governors.

1.5.2 Disqualification under the Childcare Act (June 2018)

1.5.3 What to do if you are worried a child is being abused (March 2015)

1.5.4 Working Together to Safeguard Children (2018) (WTSC)

1.5.5 Statutory Guidance issued under Section 29 of the Counter Terrorism and Security Act 2015

1.5.6 Herts Multi Agency Information Sharing for Children, Young People and Families – Code of Practice for sharing personal information – March 2015

1.5.7 Prevent Duty Guidance including The Use of Social Media for Online Radicalisation (2021)

1.5.8 Multi Agency Practice Guidelines Female Genital Mutilation (2018) \*\*

1.5.9 Statutory Framework for EYFS (2021)

1.5.10 Equal Opportunities Act 2010

1.5.11 The Children Act 1989

1.5.12 The Children Act 2004

1.5.13 The Sexual Offences Act 2003

1.5.14 Education Act 2002 (section 175)

1.5.15 Hertfordshire Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)

1.5.16 The Education (Pupil Information) (England) Regulations 2008

1.5.17 The Education (Independent Schools Standards) (England) Regulations 2014

1.5.18 Voyeuristic (Offences) Act 2019

1.5.19 Sexual violence and sexual harassment between children in schools and colleges (September 2021)

1.5.20 Relationships, Sex, Health Education 2019 (updated 2021)

\*\*Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to 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. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

1.5.21 The RMS School Safeguarding Children Policy and procedures also take into account the requirement of the National Minimum Boarding Standards (2019) Standards 11 & 14. Particular consideration must be given to any allegations or disclosures of abuse or possible abuse by a boarder concerning themselves or another boarder. In such circumstances it may be necessary to arrange

alternative accommodation for boarders to ensure the safety and well-being of the pupil and appropriate pastoral support. Boarders are also provided with one or more appropriate helpline(s) outside contact numbers, including the Children's Commissioner, Anne Longfield, the School Counsellor, Independent Listener, and Childline, to ring in case of problems or distress. The inclusive ethos and emphasis on shared values of respect and compassion protect against pupil on pupil abuse, but vigilance is maintained.

## **2. AIMS OF THIS POLICY**

2.1 to support the health and development of all children in ways that will foster security, confidence and a systematic means of monitoring children known or thought to be at risk of harm, including radicalisation, and ensure that the School contributes to assessments of need that include referral to early help services if they are a child in need of specialist services.

2.2 to provide an environment in which all children and young people, especially those in need of additional support, feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to, regardless of race, gender, sexual orientation, gender reassignment, religion or belief

2.3 to raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of the responsibility incumbent on each member of staff to identify and report promptly possible cases of abuse, including radicalisation to the relevant agency and to enable everyone to have a clear understanding of how their responsibilities should be carried out.

2.4 to emphasise the need for good levels of communication between all members of staff

2.5 to develop a structured procedure within the School which will be followed by all members of the community in cases of suspected abuse

2.6 to ensure the School has robust systems in place for ensuring that true and accurate records of events are kept and appropriately stored, and to ensure that any such records clearly differentiate between fact and opinion

2.7 to develop and promote effective working relationships with other agencies, especially the Police and Social Care, including Channel in relation to Preventing Terrorism

2.8 to ensure that all staff and volunteers working within RMS have been checked as to their suitability, including verification of their identity, following Safer Recruitment practices (see Recruitment Policy)

2.9 to prevent abuse through the teaching and pastoral support offered to pupils

2.10 to maintain support to pupils who may have been abused

2.11 to raise awareness through ongoing training, to include awareness of child sexual exploitation, child criminal exploitation, sexual violence and harassment, radicalisation, forced marriage, honour based violence & female genital mutilation. Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action without delay if such an action is suspected. Staff in direct contact with children receive safeguarding updates at each full staff meeting held half termly.

2.12 to provide statutory staff training and induction to include a review of the School's Safeguarding Policies & Procedures and to inform staff of the identity of the DSL/DDSL, their obligation to read Part 1 of KCSIE or Annex A as relevant and to inform the School of a change of status in relation to disqualification including by association.

2.13 to advise staff to maintain an attitude of "it could happen here" wherever safeguarding is concerned and always to act in the interests of the child

2.14 to recognise that 'it will be happening here' even if there are no reported cases.

## **3. PROCEDURES TO CHECK STAFF SUITABILITY**

(See Recruitment Policy)

3.1 The School has a commitment to Safe Recruitment, Selection and Vetting and practises safe recruitment procedures according to its Recruitment Policy. A trained member of staff sits on each recruitment panel and renews training every five years. The School takes all possible steps to ensure that unsuitable people are prevented from working with children through its recruitment practices, DBS checks and Induction procedures, including legislation.

3.2 All 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 checked with the Disclosure and Barring Service before starting work. All Governors, volunteer helpers and peripatetic staff working regularly during term-time such as contract staff are also vetted. Appropriate checks are also made on residential centres used by RMS for educational visits. All new staff must read and sign to confirm that they have read Part 1 & Part 5 of KCSIE (September 2020) and Annex A if they work directly with children and the relevant school policies listed in our Induction of New Staff in Safeguarding policy.

3.3 Any staff member who is aware of anything that may affect their suitability to work with children must notify the DSL immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings they may receive. They must also notify the School immediately if they are living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

3.4 The School ensures an individual is treated as unchecked until the original disclosure certificate has been seen by the School. An individual may start work but this is at the Head's discretion (having checked the barred list) and subject to appropriate controlled safeguarding arrangements being put in place which are reviewed every 2 weeks. The individual is informed of the safeguarding arrangements and must have made the DBS application in advance. The School does not confirm the appointment until the School has seen the original disclosure certificate.

#### **4. INDUCTION OF NEW STAFF**

4.1 Before starting work at RMS all new staff undertake courses in safeguarding (KCSIE) and the Prevent Strategy. All new staff receive safeguarding induction training which includes going through:

4.1.1 the School's safeguarding policies and procedures including responsibilities in being alert to signs of abuse and how to respond to a disclosure including peer on peer abuse, online abuse, Recruitment Policy and HSCB procedures

4.1.2 the staff code of conduct/behaviour policy including e-safety and social media

4.1.3 the identity of the DSL/DDSL

4.1.4 a copy of Part 1 of the latest version of KCSIE alongside Annex B and Annex A for relevant staff and EYFS guidance on Use of Mobile Phones and Using Photographic Images of Children where relevant

4.1.5 Anti –Bullying Policy & Behaviour, Discipline Policy and Child Missing from Education Policy

4.1.6 Policy to Prevent Radicalisation

4.1.7 Whistleblowing Policy – Speak Up, Speak Out

4.1.8 Confidentiality Policy

4.1.9 Policy on taking and storing photographic images and e-communications

4.1.10 Attending a safeguarding meeting with the DSL for teaching staff.

#### **5. THE ROLE OF GOVERNANCE**

5.1 The Board of Governors ensures that effective safeguarding policies are in place with a staff code of conduct

5.1.2 The Governors ensure that all staff are provided with Part 1 and Annex B (or Annex A) & Part 5 of KCSIE September 2021 and are aware of specific safeguarding issues

5.1.3 The Governors ensure that safeguarding induction is in place for all staff

5.1.4 The Governors annually review the School's safeguarding policies including an update and review of the effectiveness of procedures and their implementation. Safeguarding is on each agenda of the Governors' Pastoral Sub-Committee. DSLs meet the Safeguarding Governor termly and work together to produce and evaluate policies and their implementation.

5.2 After any safeguarding-related incident, the DSL, DDSLs and Safeguarding Governors undertake a review of procedures and the efficiency with which the safeguarding duties and child protection procedures have been discharged, including Safe Recruitment procedures to:

5.2.1 ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay;

5.2.2 approve amendments to safeguarding arrangements in the light of changing regulations or recommended best practice.

5.3 The Governors approve the job description of the DSL and DDSs who are members of SLT and ensure they have sufficient time, funding, supervision, regular training and support to perform their duties.

5.4 Governors contribute to inter-agency working which includes providing a co-ordinated offer of early help when additional needs of children are identified

5.5 Governors prioritise the welfare of children and young people and create a culture where staff are confident to challenge senior leaders over safeguarding concerns

5.6 Governors ensure appropriate filters and monitoring systems are in place to safeguard children from potentially harmful online material

5.7 Governors consider how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through Lifeskills and through Sex and Relationship Education (SRE)

## **6. THE DUTIES OF THE SCHOOL**

6.1 Safeguarding Policies are reviewed annually and are available on the School website. There is Guidance on Child Protection annexed to this policy for Staff, Volunteers and Governors and there is a RMS staff behaviour (Code of Conduct) policy.

6.2 There are disciplinary procedures in place which adhere to KCSIE (September 2021) and legislation referred to therein.

6.3 The DSL and DDSs are members of the Senior Leadership Team. These officers have undertaken the relevant training and, upon appointment, undertake DSL 'new to role' training. All staff receive refresher safeguarding training every 3 years. DSLs keep up to date with safeguarding issues and update staff at each full staff meeting

6.4 DSL/DDSs have been fully trained for the demands of this role in safeguarding and inter-agency working. They regularly attend courses with other child support agencies to ensure that they remain conversant with best practice. They undergo refresher training every two years and cover inter-agency working, participation in child protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children.

6.5 The School's paper records on safeguarding are kept locked in a secure cabinet, and are separated from routine pupil records. Access is restricted to the DSL and DDSs. Electronic records are stored on a secure online site, CPOMS.

6.6 All members of staff, volunteers and governors know how to respond to a pupil who discloses abuse. Every member of staff, including temporary, visiting, contract and volunteer staff working in school is required to report instances of actual or suspected child abuse or neglect immediately to the DSL or a DDS. This includes alleged abuse by one pupil against another in which case both pupils will be considered to be at risk.

6.7 If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately; anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point. This may include contact with the local police force and DfE dedicated helpline for advice to staff.

6.8 All staff are made aware of the early help process and understand their role in identifying emerging problems, sharing information with other professionals and working closely with the DSL to support early identification and assessment of a child's needs to prevent problems escalating.

6.9 Staff and volunteers in school are alert to the potential need for early help for more vulnerable children, eg those with a disability or additional needs; those with SEN; young carers; children who engage in anti-social behaviour; children experiencing challenging family circumstances eg substance abuse, mental health issues or domestic violence and children showing early signs of abuse or neglect, including online abuse.

6.10 The School distinguishes between safeguarding children who have suffered or are likely to suffer significant harm and those in need of additional support from one or more agencies. The former are referred to HCS immediately and the latter receive inter agency assessment via MASH.

6.11 The School exercises high vigilance in relation to identifying and responding to situations where a child goes missing from education, especially on repeat occasions. Any such episode will be reported without delay to the local authority.

6.12 The School recognises its obligation to children who may be privately fostered. If we think a child is privately fostered we will discuss this with the parents or carers and encourage them to notify the local



authority. If they consent, the School will contact the local authority on their behalf. If they do not consent we will discuss their concerns with the Education Welfare Officer or contact the local authority's private fostering officer.

6.13 The lettings policy will seek to ensure the suitability of adults working with children on the site at any time.

6.14 Community users organising activities for children are made aware of the School's safeguarding guidelines and procedures having read and understood safeguarding policies I and II and whom to contact.

6.15 The School promotes a culture of listening to children and taking account of their wishes and feelings.

6.16 The School notifies the HCS Child Welfare Officer if:

- it should have to exclude a pupil who is on a Child Protection Plan either for a fixed term or permanently.

- if there is an unexplained absence of a pupil who is on the Child Protection Plan of more than two days duration from school (or one day following a weekend).

6.17 The School works to develop effective links with relevant agencies and co-operates as required with their enquiries regarding safeguarding matters including attendance at initial case conferences, core groups and safeguarding review conferences. Contact will be made with HCS within 24 hours of a disclosure or suspicion of abuse. RMS is quick to take informal advice on borderline cases in order to prevent escalation and to respond to early signs of abuse, sharing information quickly and challenging inaction by contacting MASH. This includes contact with the local authority Prevent Lead in cases of potential radicalisation.

6.18 The School keeps written records of concerns about children noting the date, event and action taken, even where, in discussion with HCS, no formal referral is ultimately made. Such records are kept locked in the office and are separate from routine pupil records. Access is restricted to DSL/DDSL.

## **7. EYFS**

7.1 The Royal Masonic School for Girls' Child Protection (Safeguarding) policy applies to all pupils including EYFS. With specific reference to EYFS and in accordance with the statutory framework for EYFS 2021, staff must refer and adhere to the Mobile Phone and Digital Photography policy which states that staff, visitors, volunteers and students are not permitted to use their own mobile phones or to take or record any images of Foundation Stage children for their own records during session times (with the exceptions specifically listed in the Mobile Phone and Digital Photography Policy). All visitors read this policy as part of the 'signing in' procedure in the Foundation Stage.

7.2 Cameras and mobile phones are prohibited in the toilet areas. (Full policy can be found in the office in Cadogan House and Ruspini House).

## **8. BOARDING**

The School has had regard to the National Minimum Standards for Boarding Schools (NMS) when drawing up its safeguarding arrangements to safeguard and promote the welfare of pupils and ensures that its safer recruitment procedures are adopted in line with regulatory requirements. This includes drawing up a written risk assessment policy and taking appropriate action in light of any identified risks to the welfare of pupils. We recognise that there are additional vulnerabilities of international boarders for example language and cultural barriers and being a substantial distance from their home.

The policies and procedures outlined in this document are applicable to boarding pupils and meet NMSB (2015) Standard 2: Boarders Induction and Support, Standard 11; Child Protection, Standard 14: Staff recruitment and checks on other adults.

8.1 – A DBS check is completed for all persons over 16 (not on the roll of the school) who after April 2002 began to live on the same premises as the boarders but are not employed by the school. RMS uses one taxi firm who undertake DBS checks.

8.2 - Any adults entering the boarding house other than staff (including visitors, delivery and maintenance personnel) are sufficiently supervised by staff to prevent them from gaining substantial unsupervised access to boarders or their accommodation.

8.3 – We recommend that all guardians must be over the age of 25 and reside in the UK. Names of Guardian agencies are given to parents when registering their child with the school. The school does not however recommend agencies.

8.4 – No guardians are appointed by the school; this is the responsibility of the parents.

8.5 - The Boarders handbook identifies at least one person other than a parent, outside the boarding and teaching staff of the school, who pupils may contact directly about personal problems or concerns at school. Guidance on behaviour and relationships within boarding can be found in the pupil boarding handbook. Where suspected abuse or allegations of abuse have occurred staff will follow the guidelines in this policy. Relationships of all pupils are monitored carefully, with particular regard to boarder. A summarised version of this information is up in the boarding houses on notice boards as well, so pupils know who the person is and how to contact them. The pupils are also provided with appropriate helplines (Child line and NSPCC) and outside contact numbers, including the Children’s Commissioner for England, to ring in case of problems or distress.

8.6 All boarding staff, adults and senior boarding pupils given positions of responsibility (e.g. Head of Boarders) over other pupils will be given copies of this and will be advised on appropriate action to take should they receive any allegations of abuse.

8.7 Any boarder found to be missing will be dealt with according to the school’s Missing Pupil Policy

8.8 Concerns or allegations will be reported to Ofsted and/or ISI

8.9 Any boarding member of staff suspended on account of an allegation will be offered alternative accommodation off-site.

## **9. THE ROLE OF THE DSL**

9.1 The DSL is responsible for the following broad areas:

9.1.1 briefing school staff (both boarding, non-teaching, teaching staff and volunteers) and, as appropriate, prefects and other senior pupils on the relevant contents of statutory guidance and procedures, including the briefing of new staff as part of their induction after arrival at the School; and

9.1.2 receiving reports of alleged or suspected child abuse including online within the School, or reported by a pupil relating to incidents at home or outside the School, contacting the HCS and taking other action in response, as set out below. During term time the DSL and/or DDSL will always be available to discuss any safeguarding concerns. Emergency contact arrangements for DSL/DDSL are made available for out of term activities and contacts are displayed in the boarding houses for evening and weekends.

### **9.2 Managing Referrals**

9.2.1 The DSL will refer all cases of suspected abuse to Herts Children’s Services (Safeguarding & Specialist Services) or relevant local authority for pupils who reside outside Hertfordshire and

- The (Local Authority) Designated Officer (DO) for dealing with all safeguarding concerns that relate to a staff member
- the Disclosure & Barring Service and TRA (cases where a person is dismissed or left due to risk/harm to a child)
- the Police (cases where a crime may have been committed) and where there has been serious harm
- Channel where there is a radicalisation concern

9.2.2 The DSL/DDSL will refer all allegations against members of staff including volunteers and supply teachers directly to the Head without delay (and keep the supply agency fully informed). In the case of

the allegation being against the Head, it must be communicated to the Chair of the Governors **without notifying the Head**

9.2.3 The DSL will act as a source of support and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies

### **9.3 Responsibilities:**

9.3.1 providing guidance to parents, children and staff about obtaining suitable support including online safety

9.3.2 developing links with relevant statutory and voluntary agencies

9.3.3 monitoring and evaluating the effectiveness of the School's Safeguarding Children Policy and ensuring it is updated annually

9.3.4 keeping written records of all concerns, ensuring that such records are stored securely and kept separate from the pupil's general file

9.3.5 ensuring that when a pupil with a Child Protection Plan leaves the School, appropriate levels of liaison between DSLs occur and the pupil's information is transferred to the DSL at their new school as soon as possible.

### **9.4 Training**

9.4.1 The Designated Safeguarding Lead and the DDSLs receive appropriate external Herts training every two years in order to understand the assessment process for providing early help and intervention. In addition, the DSL undertakes Prevent awareness training. The DSL also refreshes knowledge and skills at least annually via online updates and by monitoring safeguarding developments and accessing resources

9.4.2 has a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so

9.4.3 ensures each member of staff has access to and understands the School's safeguarding policies and procedures, especially new and part time staff and updates staff at each staff meeting on an aspect of safeguarding

9.4.4 is alert to the specific needs of children in need, those with special educational needs and young carers

9.4.5 is able to keep detailed, accurate, secure written records of concerns and referrals

9.4.6 encourages a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

9.4.7 understands the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment procedures such as early help assessments

9.4.8 understands and supports the School with regard to the requirements of the Prevent duty and is able to provide advice and support to staff on protecting children from the risk of radicalisation

9.4.9 keeps staff updated in matters of safeguarding training, including emotional, sexual and physical abuse, neglect, online abuse and peer on peer abuse.

### **9.5 Raising Awareness**

9.5.1 the DSL ensures the School's policies are known and used appropriately

9.5.2 ensures the School's safeguarding policies are reviewed annually and the procedures and implementation are updated

9.5.3 works with the nominated Safeguarding Governor to review and update policies and keep her apprised of safeguarding procedures and concerns as appropriate

9.5.4 ensures the safeguarding policies are published on the school portal and website. Ensures that parents are aware of the fact that referrals about suspected abuse or neglect may be made to outside agencies as appropriate and that the role of the School in handling those referrals is explained to parents

9.5.5 liaises with HSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding

9.5.6 ensures the safeguarding file on any pupil leaving the School is sent to the new school as soon as possible but transferred separately from the main file

9.5.7 obtains proof of receipt by the new school and then destroys any information held on the child in line with data protection guidelines

9.5.8 Raises awareness of emerging safeguarding issues particularly online concerns

## 9.6 Record-keeping

The DSL is responsible for holding the School's copy of the current Local Safeguarding Children Board Procedures and being fully conversant with these procedures. In addition the DSL holds and is conversant with the following:

- Hertfordshire Safeguarding Children Board: Child Protection Procedures  
<https://hertsscb.proceduresonline.com/chapters/contents.html>
- Dealing with Allegations of Abuse against Teachers and other Staff – Guidance for Local Authorities, Headteachers, School Staff, Governing Bodies and Proprietors of Independent Schools (October 2012) and updated in KCSIE September 2021
- Working Together to Safeguard Children DfE (2018)
- Boarding Schools: National Minimum Standards (2019) (Senior School DSL only)
- Keeping Children Safe in Education (September 2021)
- What to do if you're worried a child is being abused 2015
- Prevent Strategy (2021)
- Sexual Violence and Sexual Harassment between children in Schools and Colleges September 2021

## 10. RAISING AWARENESS WITH PUPILS

10.1 The School prides itself on its culture of open and effective communication between staff and pupils, where children are listened to and on its excellent pastoral support structures. The School prepares all pupils to make reasoned, informed choices, judgments and decisions. Time is allocated in Life Skills and form/house time for discussion of safeguarding issues, including radicalisation and in developing in pupils the confidence which they require to recognise abuse and to stay safe including from online abuse and bullying. Screensavers remind staff and pupils of their safeguarding obligations.

10.2 All pupils know that there are adults to whom they can turn if they are worried, including the School Counsellors and Health Centre Staff. In particular:

10.2.1 The Health Centre and all boarding houses display advice on where pupils can seek help

10.2.2 The School operates a peer counselling scheme, whereby trained older pupils are encouraged to offer advice and support to younger pupils

10.2.3 The School provides leadership training to Sixth Formers and prefects, Heads of Houses, and senior pupils which specifically covers the importance of offering support and assistance to younger and to vulnerable pupils

10.2.4 The School's Confidentiality Policy guides all members of the school community.

10.3 The School recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self blame.

10.4 The School may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when at school their behaviour may be challenging and defiant or they may be withdrawn.

10.5 The School recognises the young minds of our pupils can be vulnerable and exploited by others; staff will be alert to the signs of vulnerability and/or susceptibilities to violent extremism or indoctrination.

10.6 Staff recognise the need for a culture of vigilance to be present to support safeguarding. This includes awareness and sensitivity to attitudinal changes in pupils which may indicate they are at risk of radicalisation.

10.7 The School will endeavour to support the pupil through:

a) The content of the curriculum to encourage self-esteem and self-motivation (see section 2)

b) The School ethos which (i) promotes a positive, supportive and secure environment (ii) gives pupils a sense of being valued (see section 2)

c) The School's behaviour policy which is aimed at supporting vulnerable pupils in the School. All staff will agree on a consistent approach which focuses on the behaviour involved in the offence committed by the child but does not damage the pupil's sense of self-worth. The School will endeavour to ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred.

d) Liaison with other agencies who support the student

e) The School's IT policies and Life Skills programme which build an understanding of the dangers of the internet in relation to bullying, sexting, online grooming and radicalisation.

## **11. PREVENTION**

The School plays a significant part in the prevention of harm by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection. This includes the emotional wellbeing of pupils and thus the School plays a vital role in recognising and preventing the political indoctrination of pupils either by self-radicalisation or through exposure to extremist views. See Policy to Prevent Extremism

## **12. ANTI-BULLYING**

Our policy to prevent bullying and cyber-bullying is available in the parent and pupil portals and is reviewed annually.

## **13. PHYSICAL INTERVENTION**

Our policy on physical intervention is set out in the Staff handbook and is reviewed annually. Our policies to prevent misuse of mobile technology/internet are available in the parent and pupil portals.

## **14. ALLEGATIONS AGAINST A MEMBER OF STAFF**

14.1 Allegations may relate to a person who works with children who has: behaved in a way that has harmed a child, or may have harmed a child

- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicated they may pose a risk of harm to children.

14.2 Should a pupil disclose abuse by a member of staff, including the Head of Cadogan House or Pre-School, the situation will be reported to the Head immediately. Should the allegation be made against the Head, the situation must be reported to the Chair of Governors immediately who is contactable via the Bursar's office without informing the Head. We would provide alternative accommodation away from girls for boarding or resident staff suspended pending an investigation. The Staff Code of Conduct offers clear guidance to protect staff from allegations of abuse

14.3 There are disciplinary procedures in place that adhere to KCSIE (September 2021) and the relevant legislation. Any concerns that do not meet the harm threshold are logged on the Lower Level Concerns document

14.4 The School acts in accordance with locally agreed interagency procedures and KCSIE, for dealing with allegations against staff including always making a referral to the DBS (and to TRA for a teacher) if a person in a regulated activity (paid or volunteer) has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.

14.5 The School will inform the DO immediately and work with Hertfordshire Safeguarding Children Board and Hertfordshire Police, following their guidelines, in order to deal with any allegations as swiftly as possible and always within 24 hours. In the case of an allegation against the Head, the Chair will contact the DO.

## **LOW LEVEL CONCERNS**

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Designated Officer.

Useful guidance is provided by [the NSPCC](#)

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338 of KCSiE (2021).

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

- being over friendly with children
- having favourites

- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language

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.

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Further detail can be found in the Low Level Concerns Policy

## **15. WHISTLEBLOWING PROCEDURE – SPEAK UP, SPEAK OUT**

15.1 Our policy on whistleblowing (Speak Up, Speak Out) is set out in the Staff handbook and is reviewed annually.

15.2 Any member of staff with a concern about the propriety of a colleague's behaviour should feel free to discuss these concerns with the Head. This will be treated seriously and staff should feel encouraged to take their responsibilities seriously and should not hesitate to express any concerns that they may have. If a concern relates to the Head, the member of staff should contact the Chair of Governors, Peta Dyke. There is full immunity for staff expressing a concern about a colleague in good faith.

15.3 The School has a culture of safety and raising concerns, and seeks to value staff and reflective practice. Any member of staff with a concern including about poor or unsafe practices or a possible failure in our safeguarding regime, should feel empowered to express their concern to the Head.

15.4 Where a staff member feels unable to raise an issue or that their concern is not being properly addressed, other whistleblowing channels may be open to them such as the NSPCC Whistleblowing Helpline 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)