

P1 Child Protection and Safeguarding Policy

Author: Jan Zbigniew Szafranski DSL/Head of Sixth Form
Updated in accordance with KCSIE 2021 in August 2021
Operational from 1/9/21
Modified in May 2022

Policy Review

This policy will be reviewed in full by the Governing Body no less than annually.

The policy was last reviewed in full and agreed by the Governing Body in October 2021, and reviewed in November 2021. Modifications made in December 2021 have been reviewed and approved by the Chair of the Governing Body and the Safeguarding Governor.

The DSL update of the policy will be in August 2022, or when changes in legislation and statutory guidance occur: whichever is sooner.

Until ratification by the full Governing Body this policy remains operational but in draft form.

Signature:

Date:

Signature:

Date:

The original signed copy is held by Mr Jan Zbigniew Szafranski (DSL)
This policy is available on request from the School Office and on the school website:

www.purcell-school.org

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The Purcell School has responded appropriately to all recent child protection issues and has co-operated fully with all the relevant external agencies.

Introduction

The Purcell School is committed to safeguarding and promoting the highest standard of welfare for students and expects the whole School community to share this commitment.

Safeguarding and promoting welfare is defined as protecting children from maltreatment, preventing impairment of children's health and/or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes (Working Together to Safeguard Children, DfE, 2018, pg.6).

This Child Protection Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school. In particular this policy should be read in conjunction with Keeping Children Safe in Education (DfE,2021), the Staff Recruitment Policy, Behaviour and Sanctions Policy, Anti-Bullying Policy, Staff Code of Conduct and ICT Acceptable Use Policy. The full list of documents is listed in Appendix Three. Staff must be aware of the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and deputies) and be alert to the safeguarding response to children who go missing from education.

A child is in need of protection if they are in immediate danger or at risk of harm now or in the future.

There can be no question that a specialist music school is an environment quite unlike any other. The nature of the provision, the diversity of the student body, the lack of traditional year group divisions, the relative "informality" of a creative environment/creative working and the large number of part-time visiting staff, all require specific consideration in terms of safeguarding students from potential risk. Whilst this Child Protection and Safeguarding Policy, together with an accompanying suite of complementary policies, outlines the School's approach to safeguarding in a more general sense, some of these environment-specific considerations and how the School meets the specific needs of the environment are outlined in P22 Contextual Safeguarding at The Purcell School.

Purpose of a Child Protection Policy

To inform staff, parents, volunteers, contractors governors and children about the school's responsibilities for safeguarding children.

To enable everyone to have a clear understanding of how these responsibilities should be carried out.

Hertfordshire Safeguarding Children Partnership Procedures

The school follows the procedures and inter-agency procedures established by the Hertfordshire Safeguarding Children Partnership (HSCP); a guide to procedure and practice for all agencies in Hertfordshire working with children and their families.

<https://hertsscb.proceduresonline.com/index.htm>

Note: Students at Purcell have homes in a number of different Local Authorities (LAs), each of which has its own safeguarding procedures. Before proceeding with a referral or Child Protection

Contact it is essential to establish the student's normal place of residence which can be found on SIMS, the School's Management Information System. The appropriate Local Authority can be ascertained by putting the postcode into the Government's website "[Report Child Abuse to a local council](#)". Any allegation against a member of staff is referred to Hertfordshire, as are incidents involving full time boarders.

The details below and throughout this document refer to student's resident in Hertfordshire, unless otherwise stated. When the child resides in another Local Authority, guidance should be sought (either from the DSL or directly from the LA) regarding particular arrangements for that LA.

School Staff and Volunteers

All school staff have a responsibility to provide a safe environment in which children can learn. School staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour, and failure to develop, because they have daily contact with children.

Mission Statement

- Embed a safeguarding culture in the School by establishing and maintaining an ethos and culture where children feel secure, are encouraged to talk, and are listened and responded to when they have a worry or concern.
- Establish and maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and wellbeing of a child.
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Ensure that children, who have additional/unmet needs are supported appropriately. This could include referral to early help services or Child Protection Contact to specialist services if they are a child in need and/or have been / are at risk of being abused and/or neglected.
- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum: see [KCSiE \(DfE, 2021\) pp. 31-33](#).
- Include opportunities in the PSHE/RSE curriculum for children to develop the skills they need to recognise and stay safe from abuse.
- Contribute to the five outcomes which are key to children's wellbeing:
 - to be healthy
 - to stay safe
 - to enjoy and achieve
 - to make a positive contribution
 - to achieve economic wellbeing

Staff members working with children are advised to maintain an attitude of "*it could happen here*" and "*it could be happening to this child*" in connection with safeguarding. Staff should never assume that someone else will take action and share information that might be crucial in keeping children safe: this is everyone's responsibility. Whenever there are concerns about the welfare of a child, staff members must always act in the best interests of the child, taking immediate action and following the Child Protection and Safeguarding Policy.

Implementation, Monitoring and Review of the Child Protection Policy

The procedures for ensuring that the Purcell School operates to the highest standards in providing a safe environment for students are outlined in Section 12 of this policy.

Statutory Framework

In order to protect children from harm the school will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (section 175/157)
- Education (Independent School Standards) Regulations 2014 require Independent Schools to safeguard and promote the welfare of children who are students at the school.
- Hertfordshire Safeguarding Children Partnership Manual
- ISI handbook for the Inspection of Schools - The Regulatory Requirements - February 2016
- Keeping Children Safe in Education (KCSiE) DfE September 2021
- Working Together to Safeguard Children (DfE guidance July 2018)
- The Education (Pupil Information) (England) Regulations 2005
- Counter Terrorism and Security Act 2015 (Section 26) Prevent Duty
- Disqualification under the Childcare Act 2006 (February 2015)
- *What to do if you're worried if a child is being abused* (March 2015)
- The use of social media for on-line radicalisation (July 2015)
- Mental Health and Behaviour in Schools (March 2015)
- Counselling in Schools – A Blueprint for the future (March 2015)
- Sexual Offences Act (2003)
- Female Genital Mutilation Act 2003 (section 74, Serious Crime Act 2015)
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges DfE September 2021
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry including taking overseas to force them to marry whether or not the marriage takes place).
- Serious Violence Strategy 2018

[KCSiE \(DfE 2021\)](#) states that governing bodies should ensure that the School contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children \(DfE 2018/updated 9 December 2020\)](#).

HM Government's 'Working Together to Safeguard Children' (2018) requires all schools in Hertfordshire to follow the procedures for protecting children from abuse which are established by the Hertfordshire Safeguarding Children Partnership. Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe:

- a child has been abused or is at risk of abuse

- a member of staff has behaved in a way that has, or may have harmed a child or indicates by their behaviour that they pose a risk of harm.

[KCSiE \(DfE 2021\)](#) places the following responsibilities on all schools:-

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

The School is committed to following the Prevent Duty Guidance 2015, having due regard to the requirement to prevent children from being drawn into terrorism.

In accordance with Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) staff are aware of their statutory duty 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.

KCSiE (DfE 2021) also states:

Governing bodies and proprietors have a strategic leadership responsibility for their school's or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

The role of the Designated Officer, known in Hertfordshire as the **Local Authority Designated Officer (LADO)**, is set out in 'Working Together to Safeguard Children' (2018). The LADO works within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against children, or related to a child;
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

The LADO role applies to paid, unpaid, volunteer, casual, agency and self-employed workers. They capture concerns, allegations or offences emanating from outside of work. The LADO is involved from the initial phase of the allegation through to the conclusion of the case. They will provide advice, guidance and help to determine whether the allegation sits within the scope of the procedures.

The LADO helps co-ordinate information-sharing with the right people and will also monitor and track any investigation, with the aim to resolve it as quickly as possible.

Roles and Responsibilities

The Governing Body

Governing bodies and proprietors must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times. The Governors acknowledge that safeguarding duties are the responsibility of the entire Governing Body. The Education Committee (a sub-committee of the Governing Body) monitors the effectiveness of the School's child protection responsibilities and arrangements. Additionally Governing bodies should have a senior board level lead to take leadership responsibility for the school's safeguarding arrangements.

The nominated governor for child protection is:

Dr. Rebecca Mooney: 07866 461482
r.mooney@purcell-school.org

The nominated governor visits school regularly and during those visits conducts spot-check interviews with staff concerning what to do in cases of suspected abuse and how to respond to a child making a disclosure.

In particular the Governing Body must ensure:

- their contribution to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified;
- that there are effective procedures in place to deal with allegations of abuse made by other children;
- that an effective child protection policy is in place, together with a staff code of conduct and that all relevant policies are made available on the School's website;
- ensuring that staff induction is in place with regard to child protection and safeguarding;
- that all staff are clear about their roles and responsibilities;
- that all staff are provided with Part One (or Annex A where appropriate) and Annex B of Keeping Children Safe in Education (DfE Sept 2021)
- That appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. Additional supportive material is provided in Annex D of KCSiE (DfE 2021).
- that a Designated Safeguarding Lead and deputy(ies) are appointed as the safeguarding lead and deputies respectively and that their key activities in this area (and protected time for them) are explicit in the job description approved by the Governing Body;
- that an appropriate senior member of staff from the school leadership team is appointed to the role of DSL;
- that the DSL and deputy(ies) undergo formal child protection training every two years, in line with KCSiE and HSCP procedures, and receive regular, at least annual, safeguarding updates via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments, for example;
- that acting in the best interests of children and young people is the priority and that a culture is created in which staff are confident to challenge senior leaders over any safeguarding concerns;

- that staff have the necessary skills, knowledge and understanding to keep safe children who are looked after by a local authority;
- that children are taught about how to keep themselves safe, including online safety;
- that a member of the Governing Body (usually the Chair) is nominated to be responsible in the event of an allegation of abuse being made against the Principal;
- that safeguarding policies and procedures are reviewed annually and that information is provided to the local authority concerning them and concerning how the above duties have been discharged;
- that Safeguarding is a standing item on all agendas of the Governing Body and Education Committee;
- that the minutes of the annual review of safeguarding (Summer meeting conducted by the DSL and the Governor responsible for Child Protection) demonstrate the appropriate depth and breadth of the review;
- that any referrals to the Disclosure and Barring service, Teaching Regulation Authority, Charity Commission or any other statutory authority are made when required.

The Principal

The Principal (in consultation with the Governor for Child Protection) has a duty to insist all staff follow procedures which ensure the safety and welfare of students. In particular the Principal must:

- understand the role of the DSL and approve his or her job description and ensure that s/he has the necessary resources – including protected time – to discharge his or her responsibilities and provide advice and support to other staff on welfare and child protection matters;
- receive Level 1 Safeguarding training every three years
- ensure that matters of child protection and safeguarding are regularly discussed by the DSL and the Senior Leadership team;
- brief Governors on a termly basis and more frequently if there are particular issues;
- in the circumstances of an allegation against a member of staff (or a volunteer) be the person to whom staff refer the matter;
- make a report to the DBS if any employee, volunteer or contract worker resigns, withdraws from voluntary activity or ceases to be employed by the School because s/he is considered unsuitable to work with children; the Principal will make the report within one month; no exceptions will be made and settlement agreements will not apply in this connection;
- ensure that if a teacher resigns or is dismissed as a result of ‘unacceptable professional conduct’ or ‘conduct which may bring the teaching profession into disrepute’ or in consequence of a conviction, that it considers making a report to the Teaching Regulation Authority.

The Designated Safeguarding Lead & the school’s Prevent Lead is:

Jan Zbigniew Szafranski (known internally as Ziggi): 01923 331113

(Emergency: 07388 631432)

z.szafranski@purcell-school.org

Mr Jan Zbigniew Szafranski is a member of the Senior Leadership Team. During term time the DSL and/or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns and the DSL (or a deputy) can be contacted out of hours/out of term.

If the DSL and all deputies were to be unavailable, staff should speak to a member of SLT or to Herts Children's Safeguarding Partnership.

The Purcell School's Deputies for Designated Safeguarding Lead:

Deborah Shah (Accompanist) - 01923 331108 (07855 838603) - d.shah@purcell-school.org

Sally-Ann Whitty (Learning Support) - 01923 331150 (07967 044336) - s.whitty@purcell-school.org

Paul Hoskins (Director of Music) - 01923 331134 - p.hoskins@purcell-school.org

Paul Bambrough (Principal) - 01923 331105 - p.bambrough@purcell-school.org

Thomas Burns (Deputy Principal) - 01923 331141 - t.burns@purcell-school.org

Kate Cayley (Director of Boarding) - 01923 331116 - k.cayley@purcell-school.org

See Appendix 2 for further contact details including other agencies.

The DSL takes lead responsibility for safeguarding and child protection (including online safety), The broad areas of responsibility for the DSL are:

- Managing Child Protection Contact Referrals and Cases
- Contacting the Child Protection Consultation Hub when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention
- Completing Child Protection Contact Referrals for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person, Police where a crime may have been committed and to the Channel programme where there is a radicalisation concern
- Liaise with the Principal to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a Child Protection Contact Referral by liaising with relevant agencies
- Support staff who make Child Protection Contact Referrals and other service referrals
- Share information with appropriate staff in relation to a child's looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.
- Ensure they have details of the CLA's social worker and the name of the virtual school Head Teacher in the LA that looks after the child or those currently working with a social worker.

Training

The Designated Safeguarding Lead should undergo formal DSL training every two years. The DSL should also undertake Prevent awareness training every 3 years. In addition to this training, their knowledge and skills should be refreshed at least annually via such means as e-bulletins, meeting other DSLs, taking time to read safeguarding developments or attending conferences to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.

- Have a working knowledge of how Hertfordshire conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the school's child protection and safeguarding policy and procedures, especially new and part time staff who join the school staff.
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- Understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners (Full details in Chapter one of Working Together to Safeguard Children)
- Be able to keep detailed, accurate, secure written records of concerns Child Protection Contact Referrals alongside referrals to other agencies
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage 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.

Raising Awareness

The Designated Safeguarding Lead should:

- Ensure the school's policies are known, understood and used appropriately by all staff, including part time, contractors, volunteers and supply staff.
- Work with the governing body ensure that the school's child protection and safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- Ensure the child protection and safeguarding policy is available publicly and that parents are aware that advice regarding early help and child protection concerns could be sought from the Consultation Hub and that Child Protection Contact Referrals about suspected abuse or neglect may be made.
- Ensure parents are aware of the school's statutory role regarding safeguarding of children.
- Link with Hertfordshire Safeguarding Children's Partnership (HSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership team as appropriate.
- Ensure that when children leave the School their child protection file is passed on to any new school or college as soon as possible and transferred separately from the main student file, ensuring secure transit and confirmation of receipt. The file should not be sent until the child is physically attending the new school.
- In addition, the DSL should also consider whether it would be appropriate to share any information with the new school or college in advance of the child leaving to allow for support to be in place for when the child arrives.
- Obtain proof that the new school has received the safeguarding file for any child transferring and then destroy any information held on the child unless the case is currently open and in line with data protection guidelines.
- Ensure that safeguarding policies and procedures are reviewed annually and that information is provided to the local authority about them and about how the above duties have been discharged.
- Take responsibility for the welfare and progress of children in the care of a local authority.

School Staff

Staff are responsible for:

- being aware of school policies and reading ‘Keeping Children Safe in Education’ (2021) Part One (or Annex A where appropriate), Annex B, and any subsequent updates;
- reading and following the guidance set out in ‘Guidance for safer working practices for those working with children and young people in an education setting’ (May 2019);
- attending training at the start of each academic year and at other specified times;
- reporting any concerns immediately, following the procedures laid out in the policy, being alert to the signs of abuse, bullying or children at risk of radicalisation;
- monitoring student absences and addressing concerns about irregular attendance;
- working in a professional manner and following the guidance laid out in the Purcell Staff Code of Conduct;
- following the correct staff recruitment procedures as set out in the Staff Recruitment policy;
- being aware of their statutory duties under Section 5B of the Female Genital Mutilation Act 2003 (as inserted in Section 74 of the Serious Crime Act 2015) – these place 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; those failing to report such cases will face disciplinary sanctions;
- supporting the School’s curriculum and pastoral systems and helping to ensure that students relate well to each other and feel safe and comfortable within the School;
- reporting any concerns about staff, contract workers, or volunteers to the Principal (or to the Chair of Governors should the concern relate to the Principal).

Parents and Guardians

Parents often receive information from their child about the welfare of other children in school. Parents with concerns about Child Protection issues should contact the Designated Safeguarding

Lead or a Deputy Designated Safeguarding Lead. Parents with concerns about a member of staff should contact the Principal; concerns about the Principal should be referred to the Chair of Governors. (Details in Parents' Handbook)

Students

All students should:

- be aware of the School's provision for Child Protection and reporting concerns, as outlined in the Student Handbook;
- inform a trusted person within the School if they have any concerns;
- be confident in their understanding that it is always right to tell;
- be aware of the School's security and visitor policy (Student Handbook).

Training and specific risk areas

All School staff (including the Principal), temporary staff, contract workers and volunteers in regulated activity will receive appropriate safeguarding children training in consultation with Hertfordshire Children's Safeguarding Partnership.

Records are kept of all training.

Induction

Safeguarding Induction Training will be given by the DSL (or a Deputy DSL) before or on the day that a new member of staff starts work at the School. The DSL is responsible for ensuring this training is completed. The training will cover –

- familiarity with this policy;
- the identity and function of the Designated Safeguarding Lead and deputy(ies);
- the staff guidance on professional conduct (Code of Conduct contained in the Staff Handbook);
- procedures to be followed in the case of a disclosure;
- Part 1 (or Annex A if appropriate) and Annex B of 'Keeping Children Safe in Education' (DfE, 2021), which all are required to read (link in this policy and the staff handbook, as well as on MyConcern);
- 'Guidance for safer working practices for those working with children and young people in an education setting' (May 2019) (link in this policy and the Staff Handbook);
- The School Behaviour and Sanctions Policy (Staff handbook);
- The safeguarding response to children who go missing from education;
- ICT Acceptable Use Policy (Staff).

Access to copies of these policies and KCSIE 2021 (DfE) Part 1 (and Annex A where appropriate) as well as Annex B is provided to staff at induction either via the Staff Handbook or through MyConcern.

Each Line Manager is responsible for ensuring that new members of staff in their department receive induction training which will help them to settle down and be aware of the systems, procedures and expectations of the School.

The Line Manager's induction training will cover the following safeguarding related issues –

- Confirmation that Child Protection and Prevent training has taken place and that there are no outstanding queries,
- The Staff Handbook,
- Health and Safety,
- Visitor and Site security,
- Whistleblowing policy.

Further Safeguarding Children Training

All school staff, including academic, support, administrative and visiting instrumental staff will receive appropriate safeguarding children training (which is updated every three years as advised by Hertfordshire Safeguarding Children Partnership) so that they are knowledgeable and aware of their role in the early recognition of indicators of abuse or neglect and of the appropriate procedures to follow. For new staff, following the Induction training, Level One is delivered within the first term of employment, usually through the EduCare platform, and all staff are required to renew this training every three years. In addition all staff members will receive safeguarding and child protection updates (via email, staff newsletter and staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Students are informed of Child Protection matters through –

- Student handbooks
- Tutorials
- The PSHEE curriculum
- Notice-boards in school and boarding-houses
- School assemblies
- Prefect training

One-to-one Teaching

As a specialist music school, a considerable amount of teaching is delivered in one-to-one situations. The following precautions are observed in line with Guidance for **safer working practice** for those working with children and young people in education settings - May 2019 (See Appendix 7).

- All new instrumental staff have an individual training session with the DSL on their first day prior to undertaking any teaching
- In addition to the required training and policies for all staff, Instrumental Staff are provided with the School's Instrumental Teachers Handbook which outlines in detail the School's child protection and safeguarding procedures and expectations, and gives valuable advice and guidance on conduct. The Handbook is updated annually to ensure it remains relevant and in line with the latest KCSiE.
- Another member of staff is in reasonably close proximity within the building
- Lessons take place within normal working hours or, if out of hours, the Houseparent and SLT are aware.
- Instrumental staff are not permitted to give lessons away from the school premises when working for the school. If families make requests to the teacher for continued tuition

during school holidays, the teacher is required to seek permission from the School which will then contact the family to ensure they have put satisfactory safeguards in place.

- The nature of one-to-one tuition often requires students and teachers to work in small spaces in a variety of locations around the site. The School mitigates this risk by ensuring that the interior of all practice and teaching rooms is visible from either the corridor, or from outside (or both) by having large windows and door windows. Instrumental lessons are only timetabled in practice rooms in the New Music Block (where the HoD's office is located and other academic teaching staff are based) and the main building (where multiple other adults and SLT are based) to ensure that other staff are always within sight/call.
- The issue of physical touch in instrumental teaching is a controversial area in which practice varies significantly based on the specific instrument, the immediate needs of the student, and the cultural background of the teacher. The School's policy (stated in the Instrumental Staff Handbook) is that physical touch is not prohibited but should be avoided. Where it is deemed necessary, permission should be sought and an explanation given. Any physical touch must be purposeful and the teacher should withdraw from the student's personal space immediately after the demonstration. Teachers are advised to "read" the non-verbal language of the student which sometimes might suggest they are uncomfortable even having given verbal permission.
- Staff are advised to take precautions to avoid placing themselves at risk of false allegation
- Staff should report without delay if a child has become distressed or angry.
- The working relationship between Instrumental Staff and their students is monitored closely by Instrumental Heads of Department (i.e. Head of Keyboard; Head of Strings; Head of Woodwind etc.). The HoD has responsibility for the musical progress and well-being of the students in their department. They maintain regular contact with their students and will alert the Principal to any concerns if they become aware of them.
- All instrumental staff are recruited through an open, competitive recruitment process according to strict Safer Recruitment practice. All applicants are required to teach an observed lesson and attend a formal interview at which their knowledge and instincts for good safeguarding practice is explored.
- The School will not allow Instrumental Teachers to nominate deputies where they anticipate a period of absence (for example, if the teacher is due to be away on tour). In these circumstances, the recruitment process will be conducted in full.

School Protocol for Visiting Speakers and Visiting Musicians Giving Masterclasses

- All requests for outside speakers must firstly be discussed with SLT.
- The school will undertake a risk assessment before agreeing to a visiting speaker/musician attending the school. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant. The School may also conduct research on the visiting speaker/musician and / or their organisation, as appropriate. The School will not use a visiting speaker/musician where any link is found to extremism, such as extremist groups and movements.
- The School will obtain an outline of what the speaker intends to cover in advance of the visiting speaker's visit. In some cases, the school may also request a copy of the visiting speaker's presentation and / or footage in advance of the session to ensure it is appropriate to the age and maturity of the students to be in attendance and does not undermine British values or the ethos and values of the school.
- A member of school staff will be present during the visit / talk, who will monitor what is being said to ensure that it aligns with the values and ethos of the school and British

values. In the unlikely event that the talk / presentation does not meet this requirement, visiting speakers will be informed that school staff have the right and responsibility to interrupt and / or stop a presentation. The member of staff will report this to SLT as soon as reasonably practicable after the talk / visit.

- Visiting speakers/musicians will be supervised by a school employee whilst present at the school. At no point will a visiting speaker/musician be left unsupervised in school whilst students are present.
- On arrival at the School, visiting speakers/musicians will be required to show an original current identification document including a photograph such as a passport or photo card driving licence and will be asked to sign the visitors' book.
- The visiting speaker/musician will be issued with a visitors' badge which they must wear at all times whilst on school site.
- The School will keep a formal register of visiting speakers/musicians. Any information gathered will be kept in accordance with the School's Data Protection Policy.

Safeguarding Against Playing Related Injuries

Playing-related injuries in musicians have been shown to be largely preventable.

There are a number of clear risk factors for playing related injuries in elite young musicians, and as part of our safeguarding training, we believe that these risk factors should be widely known amongst all stakeholders in the School.

As part of the safeguarding training, Purcell staff are required to read and act on the Playing-Related Musculoskeletal Injury Prevention Policy as published on the website.

Musical Performance, Rehearsal and Inter-Year Working

The nature of the School means that students are engaged in practical, project based learning which, in many cases, mirrors the actuality of working practice within the music profession. Activities such as orchestras, bands, chamber music and many other such activities will require students to work closely with each other and so the traditional division by year group one might encounter in a regular school setting is broken down here by virtue of the need for students to work alongside others of similar ability (rather than age) and as the needs of each musical project require.

Whilst such activity provides significantly positive opportunities for peer-to-peer learning, the opportunities for peer-on-peer bullying and/or abuse are potentially greater given the differing levels of maturity of students working together. To mitigate these risks the School ensures that all such activities are well staffed and that senior members of the music staff are available or on hand to deal with any emerging issues. The small size of the School, combined with its high staff-student ratio ensures close supervision and monitoring of student relationships and conduct. In the course of a week, a student will have individual contact with their instrumental teacher(s), Instrumental Head of Department, Tutor and Houseparent, as well as Practice Supervisors and their usual range of academic classes.

During the first term of a new academic year, the School devotes a significant amount of assembly, tutorial and house time to matters of respect, tolerance, kindness, understanding etc. and how best to live and work together productively and happily. This focus sets the expectation and is

reinforced by the teamwork necessary for successful music making. All staff working with these mixed groups of students are made aware of potential vulnerabilities of the students through the Monitored Students list and communication with the DSL and his deputies.

When to Be Concerned

Knowing what to look for is vital for the early identification of abuse and neglect. All staff should be aware of the Indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

If staff have any concerns about a child's welfare, they should act on them immediately. If staff have a concern, they should follow this policy and speak to the Designated Safeguarding Lead (or a deputy). The Designated Safeguarding Lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

Any staff member should be able to make a Child Protection Contact Referral to Children's Services if necessary.

All staff should be aware of the process for making Child Protection Contact Referrals to Children's Services for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm - from abuse or neglect) that may follow a contact referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Options Will Then Include:

- managing any support for the child internally via the school or college's own pastoral support processes;
- completing a Families First Assessment or a making a request for early help support.
- a Child Protection Contact Referral for statutory services, for example as the child might be in need of services, or suffering or likely to suffer significant harm from abuse or neglect.

The School has significantly increased its counselling provision with the appointment of its own specialist therapist. As a fully qualified Arts Therapist the specific needs of students are known and understood. The Therapist is a full member of staff (rather than a contractor, as previously) which enables better connectivity between her, Learning Support (where appropriate) and the wider pastoral teams within school. Students can self-refer directly to the Therapist and staff can also refer students. The Therapist reports on a half termly basis alerting staff to the main issues and trends. This feeds directly into the Safeguarding Team meetings and informs individual safety and care plans.

Extra Familial Harm (formerly Contextual Safeguarding)

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

A Child-centred and Coordinated Approach to Safeguarding:

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

Schools and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the **best interests of the child** at all times.

Children Who May Require Early Help (known as Families First in Hertfordshire)

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

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

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

Any child may benefit from early help but all school staff and volunteers should be particularly alert to the potential need for early help for:

- Children with a disability and/or specific additional needs;
- Children with special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- Children with a mental health need;
- Children who are acting as a young carer;
- Children who are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- Children who are frequently missing/go missing from care or home;
- Children who are at risk of modern slavery, trafficking or exploitation;

- Children whose family circumstances present challenges, such as substance abuse, adult mental health or learning disability, domestic violence
- Children who are misusing drugs or alcohol themselves;
- Children who have returned home to their family from care;
- Children who are at risk of being radicalised or exploited;
- Children who have a family member in prison, or are affected by parental offending;
- Children who are privately fostered;
- Children who have returned home to their family from care;
- Children who are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced marriage;
- Children who are persistently absent from education, including persistent absences for part of the school day;
- Children who are showing early signs of abuse and/or neglect.

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

See Appendix 1 of this policy for information on indicators of abuse and Appendix 5 of this policy or Appendix B of KCSiE for specific safeguarding issues.

Children with Special Educational Needs and Disabilities:

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

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

The School community is extremely diverse and we have a high proportion of students with specific needs, either SEN or EAL. It is therefore essential that the specific needs of such students are considered in any safeguarding strategy. The School has a full time Head of Learning Support who is also a Deputy DSL and a full member of the Safeguarding Team. This ensures that when concerns are raised by, or about, SEN students, the Head of Learning Support is able to immediately see the details on MyConcern and offer support and proactive interventions when necessary.

Peer on Peer Abuse (Child on Child)

The school has a specific Peer-on-Peer Abuse Policy which should be read in conjunction with the Child Protection and Safeguarding Policy. Education settings are an important part of the inter-agency framework not only in terms of identifying, evaluating and referring concerns to Children's Services and the Police, but also in the assessment and management of risk that the child or young person may pose to themselves and others in the education setting.

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

- Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- whether the perpetrator has repeatedly tried to harm one or more other children; or
- Whether there are concerns about the intention of the alleged perpetrator.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery, and now generally referred to as sharing nudes or semi-nudes):
- Initiation/hazing type violence and rituals.

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

All staff must understand consent, and the School provides guidance as to understanding consent through the PSHEE and tutorial programmes as part of a wider pastoral curriculum. In cases where a student may be identified as being vulnerable to abuse through lack of consent, an appropriate member of staff will work with the student(s) involved in delivering specific and targeted training on the nature of consent. Consent is defined by section 74 of the Sexual Offences Act 2003 and is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

It is important to know that:

- a. a child under the age of 13 can never consent to any sexual activity;
- b. the age of consent is 16; and
- c. sexual intercourse without consent is rape

The sexual abuse of children by other children is a specific safeguarding issue in education: this can include sexual violence, sexual harassment and sexting (see Part 5 of KCSIE 2021). The 2021 Ofsted review of sexual abuse in schools revealed how prevalent sexual harassment and online sexual abuse are for children and young people and their reluctance to report incidents of abuse for a wide variety of reasons. The Review recommends that all schools act as though sexual harassment and online sexual abuse are happening, even when there are no specific reports. The School maintains a zero-tolerance policy regarding all forms of sexual harassment and sexual abuse and staff must be aware of potential risks and vulnerabilities. The Peer-on-Peer Abuse Policy gives more detail of specific forms of peer-on-peer abuse as well as guidance on how to respond to concerns or allegations of peer-on-peer abuse.

Staff at The Purcell School use The Sexual Behaviours Traffic Light Tool by the Brook Advisory Service to help assess and respond appropriately to sexualised behaviour. The traffic light tool can be found at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

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

In responding to a report of sexual violence or sexual harassment staff should:

- Not promise confidentiality and share the report only with those necessary to progress it. Explain this to the victim.
- Recognise that the child has placed them in a position of trust and be supportive and respectful
- Listen, be non-judgemental, be clear about boundaries and how the report will be progressed, and do not ask leading questions, only prompting the child where necessary with open questions
- Record without being distracted by note taking
- Record only facts as presented by child
- Where the report contains an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice – not viewing or forwarding illegal images
- If possible managing reports with two staff present (one being the DSL or a deputy)
- Informing the DSL or a deputy as soon as practically possible

Staff should recognise that children are capable of abusing their peers and should not be tolerated or passed off as “banter” or “part of growing up”.

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

- Provides a developmentally appropriate PSHE and RSE curriculum which develops students’ understanding of acceptable behaviour and keeping themselves safe. Examples include recognising bullying and abuse in all its forms, including prejudice-based bullying both in person and online/via text, exploitation and trafficking), having the skills and

strategies to manage being targeted or witnessing others being targeted, recognising peer pressure and having the strategies to manage it, the role peers can play in supporting each other.

- Embedding RSE within the context of a wide ranging and high quality PSHE/Pastoral Curriculum both within the formal classroom and beyond. The Sixth Form will be provided with significant opportunities for PSHE education through assemblies, the Sixth Form Personal Development Programme, a series of focussed sessions addressing consent, sexual harassment and sexual violence and engagement with external experts;
- Providing additional support to SEN and EAL students where necessary such that they are able to understand the concepts within their own contexts;
- Educating students about consent;
- Presents assemblies which emphasise a respect agenda and acts of kindness.
- Reinforces the respect agenda in the boarding house community.
- Has systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued – see the Anti-Bullying and Peer-on-Peer Abuse Policies for details and advice in the Student Handbook. Students have a dedicated tutor and Houseparent but are encouraged to speak to any trusted member of staff.
- Requires all staff to challenge the attitudes that underlie such abuse (both inside and outside the classroom);
- Ensures victims, perpetrators and any other child affected by peer on peer abuse will be supported -see the Anti-Bullying and Peer-on-Peer Abuse Policies for details. The Hertfordshire Safety and Support Plan is used where appropriate.
- Develop robust risk assessments where appropriate (e.g. Using the Hertfordshire Risk Assessment Management Plan and Safety and Support Plan tools).
- Has relevant policies in place (Anti-Bullying, Behaviour and Sanctions, Peer-on-Peer Abuse)
- Ensures that only those practice rooms which are located within the vicinity of a member of staff/House and have high levels of public visibility are made available for student practice during the evening and weekends, as the number and placement of these rooms, necessary in any specialist musical environment, has the potential to be exploited for peer-on-peer bullying and/or abuse, especially during the evenings and weekends. The Supervision Policy outlines the arrangements for the supervision of this activity which is monitored by residential members of SLT, the residential Nurse and a dedicated RGA (Resident Graduate Assistant).

When there is evidence or an allegation of abuse by one or more students against another student (see Anti-Bullying and Peer-on-Peer Abuse Policies), a bullying incident should be treated as a child protection concern and referred by the DSL to Children's Services when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Care will be taken to ascertain what the wishes of the victims of bullying might be and these will feature in the DSL's discussion with Children's Services.

In such circumstances it is obviously helpful if the identity of the alleged abusers is specified in the disclosure. However the student(s) disclosing abuse must never be pressed to reveal names during the initial disclosure (those details can be dealt with in follow up by the Hertfordshire Safeguarding Children Partnership, Police or the School). It is particularly important that the recipient of the disclosure never attempts to guess the identity of the abuser(s). In such circumstances the DSL will follow this policy in association with the School's Anti-Bullying Policy. Each child involved - bully, abuser or victim - will be treated as being at risk.

Victims, perpetrators and any other child affected by peer on peer abuse may be supported by:

- Tutor (or an alternative trusted adult) meeting
- Peer mentoring
- The School Counsellor
- Safety and Support Plans
- A RAMP

Any such allegations will always be taken seriously and will be dealt with using sensitivity and care. The same principles for dealing with any disclosure apply to such cases. The HSCP Child Protection procedures will always be followed.

Where there is an allegation or concern that a child has abused others Section 4.4 of the Hertfordshire Safeguarding Children Partnership Inter Agency Child Protection Procedures manual, 'Children Who Abuse Others':

http://hertsscb.proceduresonline.com/chapters/p_chil_abuse.html

Staff should also refer to Part five of Keeping Children Safe in Education (DfE 2021) – 'Child on child sexual violence and sexual harassment':

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

Serious Violence

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

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

Also refer to **Schools Toolkit** the characteristics of young peoples' vulnerability to CSE and CCE on the HGFL: <https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/specific-safeguarding-issues/child-sexual-and-criminal-exploitation>

Recognising Possible Signs of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

All staff receive training to ensure that they are able to recognise signs of abuse and staff are encouraged to report any concerns however insignificant they may appear. All staff and volunteers should be aware that the main categories of abuse are:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

All staff and volunteers should be concerned about a child if he / she presents with indicators of possible significant harm – **see Appendix 1 for details.**

Generally, in an abusive relationship the child may:

- Appear frightened of the parent/s or other household members e.g. siblings or others outside of the home.
- Act in a way that is inappropriate to her / his age and development (full account needs to be taken of different patterns of development and different ethnic groups).
- Display insufficient sense of 'boundaries', lack stranger awareness.
- Appear wary of adults and display 'frozen watchfulness'.

Other Specific Forms of Abuse and Safeguarding Issues (see KCSIE DfE 2021 Annex B)

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 a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. At The Purcell School, older day students may be travelling to and from school independently and boarders may be allowed off site at evenings and weekends, and it is important that we provide them with practical advice on how to keep themselves safe. Where appropriate, this advice may be given by pastoral and boarding staff, or by visitors from external agencies, including local police staff. 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 age appropriate guides available from the Gov.uk website to support children 5-11-year olds and 12-17 year olds which will be made available to any student at The Purcell School who is required to attend criminal court(s). Making child arrangements via the family courts following separation can be stressful and entrench conflict in families and it is important that any staff / volunteers working with a student in this or similar situations recognise that 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. This may be useful for some parents and carers and the DSL (or deputy as appropriate) will pass this information on if required.

Children Missing from Education

Staff should be aware that a child going missing from education is a potential indicator of abuse or neglect and the issue should be treated as a safeguarding concern. The School will monitor all student absences and promptly address concerns about irregular attendance with the parent / carer. All staff are required to read and familiarise themselves with the School's Admissions Policy regarding children missing from education.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in Annex B of KCSiE (DfE 2021).

Cybercrime

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 a 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 Designated Safeguarding Lead (or a deputy), will 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.

Note that 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](#), ‘[NPCC-When to call the Police](#)’ and [National Cyber Security Centre - NCSC.GOV.UK](#). Further information can be found in Annexe B of KCSIE (2021) and The Purcell School H10 Online Safety Policy.

Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriate trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. The School also employs a trained counsellor who will be available 3-4 days a week to see students in strict confidence.

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

PREVENT: Safeguarding Children and Young People from Radicalisation

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

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism.” (page 133, KCSiE [DfE 2020])

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

Local Hertfordshire County Council guidance on Prevent is featured at 6.25 of the Hertfordshire Safeguarding Children’s Partnership CP procedures https://hertsscb.proceduresonline.com/chapters/p_prevent_guide.html which outlines the specific duties in Hertfordshire. This guidance also features advice on making a Prevent referral. (please note: at the time of writing this policy 6.25 of the HSCP CP procedures is under review)

Domestic Abuse

Domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological; physical; sexual; financial; and emotional.

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Bursar will refer any concerns about the financial situation of families to the DSL where appropriate, in order for the DSL to identify any particular vulnerabilities that may lead to a risk of homelessness.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases, staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the Designated Safeguarding Lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

So-called "Honour-based" Violence Including Female Genital Mutilation and Forced Marriage

So-called "honour-based" violence encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community.

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse. Staff must be aware of the mandatory reporting duty to the Police.
- Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of either one or both parties and coercion is used.

Responding to a Disclosure

Children who have been abused attempt to tell an adult on average four times before they are heard. All staff at the Purcell School need to be aware that they could be chosen by a student who wishes to make a disclosure and should know how to respond appropriately. The key points to be remembered are:

- Listen to what is being said without displaying shock or disbelief.
- Accept what is being said.
- Allow the child to talk freely.
- Reassure the child, but not make promises which might not be possible to keep.
- Never promise a child that you will not tell anyone - as this may ultimately not be in the best interests of the child.
- Reassure him or her that what has happened is not his or her fault.
- Stress that it was the right thing to tell.
- Listen, rather than ask leading questions.
- Not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.
- Ensure that the child feels secure once the disclosure is concluded.
- Record on MyConcern (see Record Keeping)
- Pass the information to the DSL without delay (if recording using MyConcern this will be automatically passed to the DSL and their deputies).

If at any point there is risk of immediate serious harm to a child a Child Protection Contact Referral should be made to Children's Services immediately.

Third Party Disclosures

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

Therefore, when safeguarding concerns are shared to the DSL by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter also directly rather than assume the responsibility is that of the school.

Support

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

If the staff member receives a disclosure about potential harm caused by another staff member, they should see section 8 of this policy - *Allegations involving school staff/volunteers/contractors.*

Reporting a Disclosure

A disclosure should be reported to the DSL immediately. If the DSL is not available then contact should be made with one of the Deputy DSLs. If the disclosure is about a member of staff, it should be made to the Principal; if the disclosure relates to the Principal, it should be made to the Chair of Governors. You will be asked to make a formal written record as soon as possible.

Record Keeping

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded on MyConcern. If in doubt about recording requirements staff should discuss with the DSL.

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

- Make brief notes as soon as possible after the conversation and record on MyConcern;
- Not destroy the original notes in case they are needed by a court;
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- Use the body map (a proforma body map is available on HGFL) to indicate the position of any bruising or other injury as well as a clear description of the injury;
- Record statements and observations rather than interpretations or assumptions.

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

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

The member of staff making the disclosure will know that this is seen by the Safeguarding Team who are sent an immediate email notification through MyConcern. Detailed follow-up information will not usually be provided.

If the member of staff is apprehensive as to whether a concern has been dealt with by the DSL, they may approach any member of School SLT.

Action to be Taken by the DSL following a Disclosure

The DSL will decide whether the concerns should be referred to Children's Services and, if so, will contact Hertfordshire Children's Services (or the most relevant local authority), or the Police if a crime has been committed, **within 24 hours** of a disclosure or suspicion of abuse.

If it is decided to make a Child Protection Contact Referral to Children's Services, this will be discussed with the parents, unless to do so would place the child at further risk of harm. No consent from either parents or child is required to make a Child Protection Contact Referral where there are concerns about the child's safety.

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

Where children leave the school, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and obtaining confirmation of receipt. This will be transferred separately from the main student file. If the school receives such information the DSL and SEND lead are made aware. If a child has an allocated social worker, the DSL will inform them of the change of school.

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

As adults who work with children, all staff have a duty to refer safeguarding concerns to the Designated Safeguarding Lead. However, if

- concerns are not taken seriously within an organisation, or
- action to safeguard the child is not taken by professionals and
- the child is considered to be at continuing risk of harm

then staff should speak to the DSL in their school or contact Hertfordshire Children's Services.

If, at any point, there is a risk of immediate serious harm to a child a Child Protection Contact should be made to Children's Services immediately. Anybody can make a Child Protection Contact 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.

If an allegation of abuse is made about someone outside the school, the school will initially make a decision about the nature of the abuse. If it is decided that the child has suffered or is likely to suffer significant harm, then the case will be reported immediately to Children's Services. However, if it is decided that the child is in need of additional support from one or more agencies we will ask for an inter-agency assessment using the local processes. In Hertfordshire this is the Families First Assessment process.

Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff, volunteers and contract workers in schools.

- All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police).
- If a child confides in a member of staff / volunteer and requests that the information is kept secret, it is important that the member of staff / volunteer tell the child in a manner appropriate to the child's age / stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

School Procedures

Please see Appendix 4: What to do if you are worried a child is being abused: flowchart.

If any member of staff is concerned about a child he or she must inform the Designated Senior Person. The Designated Senior Person will decide whether the concerns should be raised to Children's Services and if deemed to have met the threshold a Child Protection Contact Referral will be completed. If it is decided to make a Child Protection Contact Referral to Children's Services this will be discussed with the parents, unless to do so would place the child at further risk of harm.

While it is the DSLs role to make Child Protection Contact Referrals, any staff member can make a Child Protection Contact Referral to Children's Services if a child is in immediate danger or is at risk of harm (e.g. concern that a family might have plans to carry out FGM). In these circumstances a Child Protection Contact Referral should be made to Children's Services and/or the Police immediately. Where Child Protection Contact Referrals are made by another member of staff, the DSL should be informed as soon as possible.

If a **teacher** (persons employed or engaged to carry out teaching work at schools and other institutions in England), in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police. **This is a mandatory reporting duty.** See Keeping Children Safe in Education (DfE 2021): pp. 131-132 for further information.

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

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of any verbal disclosures and observations.

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

If a student who is/or has been the subject of a child protection plan changes school, the Designated Safeguarding Lead will inform the social worker responsible for the case and transfer the appropriate records to the Designated Safeguarding Lead at the receiving school, in a secure manner, and separate from the child's academic file.

The Designated Safeguarding Lead is responsible for making the senior leadership team aware of trends in behaviour that may affect student welfare. If necessary, training will be arranged.

Communication with Parents

The Purcell School will ensure the child protection policy is available publicly via the school website, and in hard copy in the School Office.

Parents will be informed prior to a Child Protection Contact Referral, unless it is considered to do so might place the child at increased risk of significant harm by:

- The behavioural response it prompts e.g. a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed;
- Leading to an unreasonable delay;
- Leading to the risk of loss of evidential material;
- Placing a member of staff from any agency at risk.

The school will endeavour to ensure that parents have an understanding of the responsibilities placed on the school and staff for safeguarding children.

Where reasonably possible the school will hold more than one emergency contact number for each student. (KCSiE [DfE 2021] p.26)

Further guidance around information sharing can be located within; **Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers** (DfE, 2018):

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Allegations Involving School Staff/Volunteers/Contractors

An allegation is any information which indicates that a member of staff, a volunteer or a contractor may have:

- 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 which indicates s/he may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicated they may not be suitable to work with children.

This applies to any child with whom the member of staff / volunteer / contract worker has contact in their personal, professional or community life.

This relates to members of staff, supply staff, volunteers and contract workers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police. Staff should be aware of the procedure for reporting any concerns about staff or volunteers, including low-level allegations, detailed in the Policy for Handling Allegations of Abuse Made Against Staff (S12). A copy of this policy can be found at Appendix 11.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, school professional standards and professional responsibilities (code of conduct) and Government document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (May 2019) and is available in the Staff Handbook or via the link in appendix 7 of this document.

What Staff Should Do if They Have Concerns About Safeguarding Practices Within the School

All staff, volunteers and contractors should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding arrangements. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the school's senior leadership team.

If staff members have concerns about another staff member then this should be referred to the Principal. Where there are concerns about the Principal, this should be referred to the Chair of Governors.

The Chair of Governors in this school is Dr Bernard Trafford. He may be contacted through the Clerk to the Governors, Mr Adam Wroblewski: a.wroblewski@purcell-school.org (01923 331127)

In the absence of the Chair of Governors, the Safeguarding Governor, Dr Rebecca Mooney, should be contacted (07866 461482).

If a staff member feels unable to raise an issue with their employer or that their genuine concerns are not being addressed, allegations should be made directly to the LADO.

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Principal.

If the allegations are about the Principal, then they should be reported directly to the Chair of Governors without informing the Principal (see contact details above, or at the end of Appendix 2). The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Principal will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO). LADO Threshold Guidance may be used to inform this decision – found at

https://hertsscb.proceduresonline.com/chapters/p_manage_alleg.html

Children's Services – 0300 123 4043

SOOHS (Out of Hours Service-Children's Services) – 0300 123 4043

If the allegation is about the Principal, the Chair of Governors will follow the same procedure.

If the allegation meets any of the three criteria set out at the start of this section, contact should be made with the LADO without delay.

If it is decided that the allegation requires a child protection strategy meeting or joint evaluation meeting, this will take place in accordance with section 4.1 of the Hertfordshire Safeguarding Children Partnership Procedures Manual.

If it is decided it does not require a child protection strategy meeting or joint evaluation meeting, the LADO will provide the employer with advice and support on how the allegations should be managed.

The Principal should, as soon as possible **following the briefing** from the Local Authority Designated Officer, inform the subject of the allegation.

For further information see:

Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 [Managing Allegations Against Adults who work with Children and Young People](#)

Where a staff member feels unable to raise an issue with their employer/through the Whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- Children's Services **0300 123 4043**
- NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: **0800 028 0285** – 08:00-20:00 Mon- Fri and email: help@nspcc.org.uk

Safer Working Practice

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the Code of Conduct and Safer Recruitment Consortium document *Guidance for safer working practice for those working with children and young people in education settings (May 2019)* and also *Addendum April 2020* available at <https://www.saferrecruitmentconsortium.org/>

This document seeks to ensure that the responsibilities of school leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the Behaviour and Sanctions Policy for more detail.

HSCP escalation and complaints procedure:

https://hertsscb.proceduresonline.com/chapters/p_resolution_disagree.html

Possible Outcomes

If the school dispenses with the services of any person (whether employed, contracted, a volunteer or student) because he or she is considered unsuitable to work with children, the Principal will inform the Disclosure and Barring Service (DBS) within one month of the person leaving the school. The same will apply if the school would have dispensed with their services had the person not resigned, or where they resigned before a proper investigation could be completed.

The school will consider making a referral to the Teaching Regulation Authority (TRA) where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence'.

If a member of the resident Boarding Staff is suspended in circumstances of a child protection nature, alternative accommodation will be provided for that member of staff, as stated in their Licence to Occupy. All residential staff and their families are required to abide by the school's 'Non-Employee Accommodation Policy', which is issued to all adults living on site, and states clearly the school's expectations relating to Child Protection.

Supporting Those Involved

Parents or guardians of a child or children involved will be told as soon as possible. They will be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution. This includes the outcome of any disciplinary process. The School will provide support to the child / children involved.

The School will keep the person who is the subject of allegations informed as the progress of the case and consider what support is appropriate for the individual. If the member of staff is suspended they will be kept informed about developments at the School. Staff are advised to contact their union or professional body as soon as possible.

The Purcell School makes every effort to maintain confidentiality and guard against unwanted publicity. The restrictions apply up to the point where the accused person is charged with an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

Monitoring and Evaluating Child Protection Arrangements

There are a number of measures taken by the School to monitor the effectiveness of policies and procedures and ensure that the School provides a safe and caring environment for all students. These include:

- School risk management register;
- Annual review of safeguarding and associated policies;
- Safer recruitment procedures and policies are regularly reviewed and management checks of recruitment files and the Single Central register are carried out;
- Safeguarding is an agenda item on all Education Committee and Governing Body meeting agendas;
- There is a designated Governor (Dr Rebecca Mooney) with a CP brief who visits the School regularly and reviews school processes;
- Safeguarding is regularly discussed by the SLT;
- The DSL and SLT attend regular training and briefing sessions to ensure they are up to date with legislation and advice in their respective areas;
- The Hertfordshire audit document is used to monitor procedures;
- Compliance with the policy is monitored by the DSL and through staff performance measures.

APPENDIX 1 - Indicators of Abuse and Neglect
The framework for understanding children’s needs:



Working Together to Safeguard Children (DFE, 2018)

Physical Abuse	
Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	
Child	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size Burns and Scalds – shape, definition, size, depth, scars	Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injury	Fabricated or induced illness -
Parent	Family / Environment
Parent with injuries	History of mental health, alcohol or drug misuse or domestic violence.

Evasive or aggressive towards child or others	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Explanation inconsistent with injury	Marginalised or isolated by the community.
Fear of medical help / parents not seeking medical help	Physical or sexual assault or a culture of physical chastisement.
Over chastisement of child	
Emotional Abuse	
Emotional abuse is 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 from 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.	
Child	
Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug / solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner' Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour
Parent	
Family / Environment	
Observed to be aggressive towards child or others	Marginalised or isolated by the community.
Intensely involved with their children, never allowing anyone else to undertake their child's care.	History of mental health, alcohol or drug misuse or domestic violence.
Previous domestic violence	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
History of abuse or mental health problems	Past history in the care of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Mental health, drug or alcohol difficulties	Wider parenting difficulties
Cold and unresponsive to the child's emotional needs	Physical or sexual assault or a culture of physical chastisement.
Overly critical of the child	Lack of support from family or social network.

Neglect

Neglect is 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child

Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships

Parent

Family / Environment

Failure to meet the child's basic essential needs including health needs	Marginalised or isolated by the community.
Leaving a child alone	History of mental health, alcohol or drug misuse or domestic violence.
Failure to provide adequate caretakers	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
Keeping an unhygienic dangerous or hazardous home environment	Past history in the family of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Unkempt presentation	Lack of opportunities for child to play and learn
Unable to meet child's emotional needs	Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
Mental health, alcohol or drug difficulties	

Sexual Abuse

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

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

APPENDIX 2 – Contact Checklist

DSL & Prevent Lead, **Mr Jan Zbigniew Szafranski** (Head of Sixth Form)

01923 331113, 07388 631432

z.szafranski@purcell-school.org

Deputy DSL, **Ms Deborah Shah**, (Music Department)

01923 331108, 07855 838603

d.shah@purcell-school.org

Deputy DSL, **Sally-Ann Whitty** (Learning Support)

01923 331150, 07967 044336

s.whitty@purcell-school.org

Deputy DSL, **Paul Hoskins** (Director of Music)

01923 331134

p.hoskins@purcell-school.org

Deputy DSL, **Mr Paul Bambrough** (Principal)

01923 331105

head@purcell-school.org

Deputy DSL, **Mr Thomas Burns** (Deputy Principal)

01923 331100

t.burns@purcell-school.org

Deputy DSL, **Lady Kate Cayley** (Director of Boarding)

01923 331116

k.cayley@purcell-school.org

Chair of Governors, **Dr Bernard Trafford**

Via the Clerk to the Governors, Mr Adam Wroblewski: 01923 331127

a.wroblewski@purcell-school.org

Governor with lead responsibility for Safeguarding

Dr Rebecca Mooney

07866 461482

r.mooney@purcell-school.org

The Police – 101

Children's Services (including out of hours) - 0300 123 4043

The Child Abuse Investigation Unit can be contacted on 101.

This is a specialist team that is a department within the police with countywide responsibility for undertaking child protection investigations.

Hertfordshire Safeguarding Children Partnership Team:

Room 147, Postal Point CHO143
County Hall
Hertford
Hertfordshire
SG13 8DF
Telephone: 01992 588757
Fax: 01992 588201
Email: admin.hscb@hertfordshire.gov.uk

Local Authority Designated Officer(s) for Hertfordshire

Tony Purvis	Yvette Morello
01992 556979	01992 556463
tony.purvis@hertfordshire.gov.uk	yvette.morello@herfordshire.gov.uk

Local Authority Designated Officer.
Child Protection Statutory Review and Performance Team.
County Hall, Peggs Lane, Hertford, SG13 8DF.

Independent Schools Inspectorate

Concerns about a school or in relation to child protection – 0207 6000 100
concerns@isi.net

Hertfordshire Constabulary Prevent Counter Terrorism Channel

For concerns about a person becoming radicalised dial 101 and ask for the PREVENT team.
For urgent police assistance dial 999.

DfE Prevent dedicated telephone helpline

020 7340 7264

NSPCC

0800 800 5000

www.nspcc.org.uk

NSPCC Whistleblowing helpline - for staff who do not feel able to raise concerns regarding child protection failures internally:

help@nspcc.org.uk

0800 029 0285

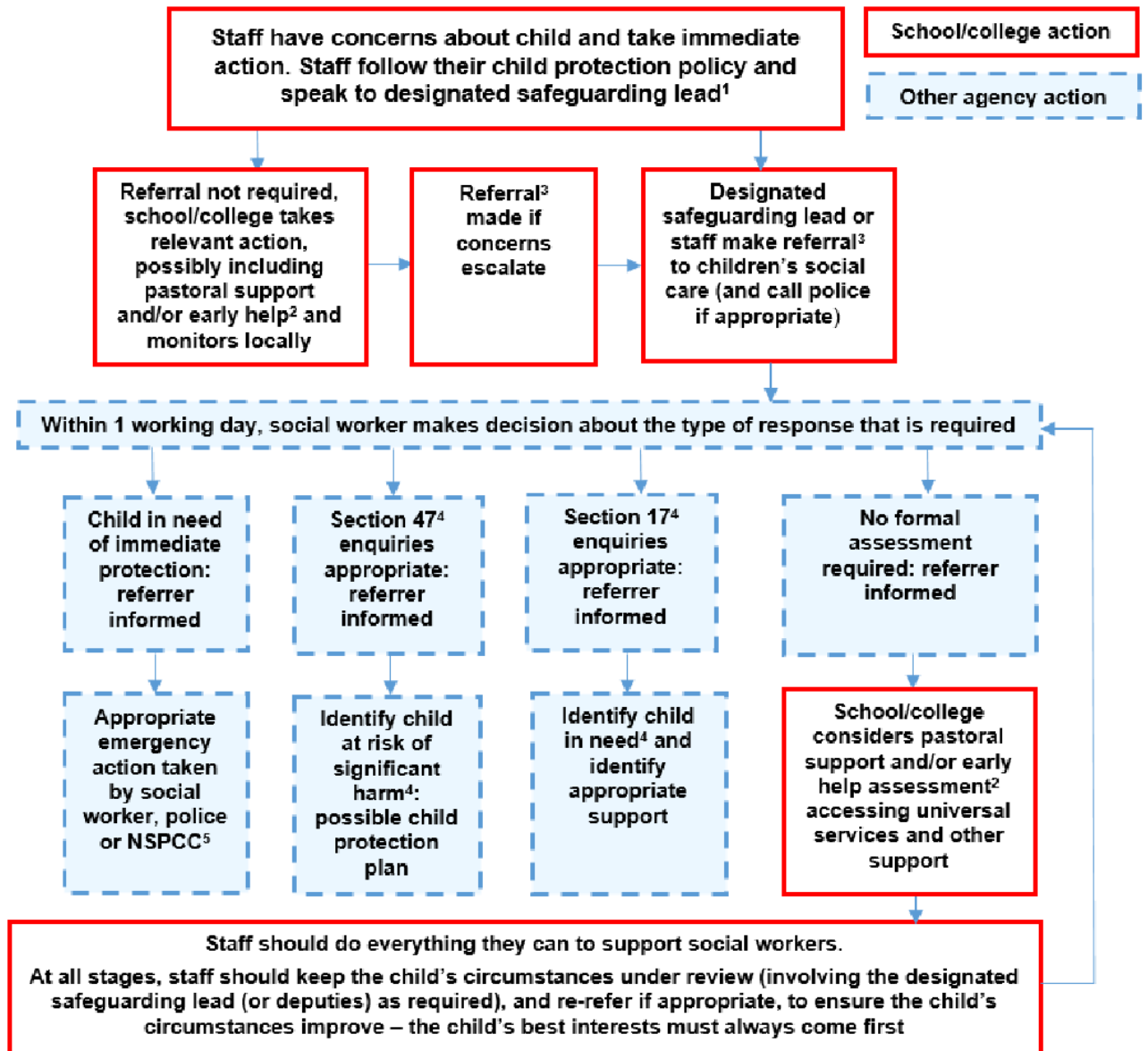
APPENDIX 3 – Safeguarding Policies

The Child Protection policy is one of a number of policies in place at the Purcell School to help protect our students. All policies are available in the Staff Handbook.

- P2 Anti-Bullying including Anti-Cyberbullying policy
- H2 Educational Visits policy
- G8 Minibus policy
- P6 School Rules policy
- P9 Supervision of Students policy
- H1 Health and Safety policy
- H6 Missing Student policy
- S1 Staff Recruitment policy
- M5 External Music Lessons policy
- H3 Security and Visitor Policy
- H7 Taking, storing and using images of young people
- M1a ICT Acceptable Use policy (Staff)
- M1b ICT Acceptable Use policy (Students)
- M3 Whistleblowing policy
- Staff code of conduct
- P14 Medical and First Aid policy
- P4 Behaviour and Sanctions policy
- P5 Boarding policy and Boarding Statement
- Students in Staff Accommodation policy
- P8 Drugs and Alcohol policy
- P7 Student car policy
- A5 Sex and Relationships Education policy
- A8 Personal, Social, Health and Economic Education (PSHEE) Policy
- A4 Learning Support and Special Educational Needs and Disability (SEND) policy
- H4 Emotional Health and Wellbeing policy
- H5 Playing Related Musculoskeletal Injury Prevention policy
- S12 Allegations of Abuse Against Staff policy
- S11 Staff Induction policy
- P18 Student Access to Pastoral Support policy
- P19 Provision for Students with Particular Religious, Dietary, Language or Cultural Needs policy
- P17 Preventing Radicalisation and Extremism policy
- P16 Peer-on-peer Abuse policy
- P13 Attendance policy
- P9 Supervision of Students policy
- M5 External Music Lessons policy
- H12 Restraint policy
- H10 Online Safety policy
- H3 Security and Visitors policy
- G1 Equal Opportunities policy
- G2 Data Protection policy
- P22 Contextual Safeguarding at The Purcell School

APPENDIX 4 – Actions Where There Are Concerns About a Child

Flowchart (also found on page 23 of KCSiE [DfE 2021])



The National Police Chiefs' Council- *When to call the police* guidance

This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment

- Sexual offences
- Theft
- Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police. Further guidance can be found at:

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

APPENDIX 5: KCSIE (DfE 2021)

On publication of this Child Protection Policy, September 2021, the DSL has decided to provide the hyperlink only to KCSiE rather than the document in its entirety, due to the potential for updates to the content.

All staff that have direct working with children should have access and have read Part One (or Annex A should this be deemed appropriate to their role within the school) and Annex B (which provides further information specific forms of abuse and safeguarding issues) of this statutory guidance. Those staff who do not work directly with children should read **either Part One or Annex A** (a condensed version of Part One) of this guidance. This is entirely a matter for the school and will be based on their assessment of which guidance will be most effective for staff to safeguard and promote the welfare of children. **Any decision on which guidance should be read will be made by the DSL and the Principal.** All Staff should also have the opportunity to seek clarity from designated staff for any content.

This is to assist staff to understand their role and discharge their responsibilities as set out in this guidance.

A copy of the relevant sections of KCSiE will be uploaded to MyConcern, where staff will need to verify that they have read and understood on the system. Staff will subsequently be re-directed to these documents again should any changes occur.

Link to KCSiE (DfE, 2021):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999348/Keeping_children_safe_in_education_2021.pdf

APPENDIX 6 – Safer Working Practice

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, the Purcell School Staff Code of Conduct and Safer Recruitment Consortium document *Guidance for safer working practice for those working with children and young people in education settings (May 2019)* available at

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

The document seeks to ensure that the responsibilities of school leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998). Please see the school's behaviour management policy for more information.

APPENDIX 7 - Operation Encompass

Information Sharing from Police regarding Domestic Abuse notification (2nd December 2019)

Operation Encompass Safeguarding Statement:

- Our school is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse.
- Operation Encompass means that the police will share information about Domestic Abuse incidents with our school PRIOR to the start of the next school day when they have been called to a domestic incident.
- Our parents are fully aware that we are an Operation Encompass school.
- The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.
- The Key Adult has also led training for all school staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed how we can support our children following the Operation Encompass notification.
- We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.
- The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.
- The Key Adult has used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by the school.

Our Key Adults Are: Mr Jan Zbigniew Szafranski (DSL) / Mr Tom Burns (Deputy Principal)

Children Missing From Education in Accordance with Setting Attendance Policy

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children missing from education are children of compulsory school age who are not registered students at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, child sexual exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Department for Education guidance makes it clear that in carrying out this duty, local authorities must have in place arrangements for joint working and information sharing with other local authorities and partner agencies. It also states that all agencies which come into contact with children must cooperate with the local authority's arrangements for identifying children thought to be missing from education.

Separate guidance is available for schools on Herts Grid for Learning about the legitimate removal of students from a school roll. A child legitimately removed from roll is not in most cases missing from education and all schools, including academies and independent schools are legally required to notify the local authority when they remove/plan to remove a child from their roll.

APPENDIX 8 - Sexual Violence and Sexual Harassment Between Children In Schools And Colleges Guidance (2021)

This is advice provided by the Department for Education (the department). Its focus is child on child sexual violence and sexual harassment at schools and colleges. The advice covers children of all ages, from primary through to secondary stage and into colleges and online. For the purposes of this advice, a child is anyone under the age of 18. Whilst the focus of the advice is on protecting and supporting children, schools and colleges should of course protect any adult students and engage with adult social care, support services and the police as required.

The advice sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred. The advice highlights best practice and cross-references other advice, statutory guidance and the legal framework. This guidance should be read alongside this Child Protection and Safeguarding Policy.

On publication of this Child Protection and Safeguarding Policy, September 2021, the DSL has decided to signpost to the document rather than provide the document in its entirety, due to the potential for updates to the content.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf

APPENDIX 9 – Online Safety Guidance

On publication of this Child Protection Policy, September 2021, the DSL has decided to signpost to the document rather than provide the document in its entirety, due to the potential for updates to the content. An overview of the Hertfordshire Guidance is given below, and can be accessed through the provided URL.

The school has a separate Online Safety Policy which can be found on the school website.

Annex D: KCSiE (DfE,2021) for national guidance

Hertfordshire Guidance: <https://thegrid.org.uk/safeguarding-and-child-protection/online-safety/online-safety-national-guidance>

- **Harmful online challenges and online hoaxes**
This non-statutory advice aims to support designated safeguarding leads (DSL) or equivalents, and senior leadership teams to respond effectively to incidents involving harmful online challenges and online hoaxes.
- **Preventing bullying**
Guidance for schools on preventing and responding to bullying, including cyber-bullying
- **Teaching online safety in schools**
Guidance supporting schools to teach students how to stay safe online when studying new and existing subjects.
- **Safeguarding and remote education during coronavirus (COVID-19)**
Understand how to follow safeguarding procedures when planning remote education strategies and teaching remotely during the Covid-19 outbreak
- **Safeguarding children and protecting professionals in early years settings: online safety considerations**
Guidance to help those who work in early years settings consider their practice and to take steps to safeguard both children and adults online.

APPENDIX 10 - COVID Guidance into the New Academic Year 2021-2022

On publication of this Child Protection Policy, September 2021, the DSL has decided to provide the hyperlink to the document rather than the document in its entirety, due to the potential for updates to the content.

<https://www.gov.uk/government/collections/guidance-for-schools-coronavirus-covid-19>

APPENDIX 11 - GDPR, Data Protection and Freedom of Information

There may be additional guidance regarding information held for Child Protection and Safeguarding purposes in line with the Freedom of Information Act (2000) and guidance from the Information Commissioner's Office. The school may also seek advice from its legal providers as needed.

Further information can be accessed at; <https://ico.org.uk/for-organisations/>

APPENDIX 12 – S12 Policy for Handling Allegations of Abuse Made Against Staff

The following policy is copied here for ease of reference and is also available for viewing as a stand-alone policy.

S12 Policy for Handling Allegations of Abuse Made Against Staff

Section 1: Allegations That May Meet the Harms Threshold

This section is based on 'Section 1: Allegations That May Meet the Harms Threshold' in part 4 of Keeping Children Safe in Education. This policy should be read in conjunction with the School's Code of Conduct Policy and Child Protection Policy.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, 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 indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be Principal, or the Chair of Governors where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the Accused until the Case is Resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for Dealing with Allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional Considerations for Supply Teachers and all Contracted Staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome
- The governing board/Principal will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Specific actions

Action Following a Criminal Investigation or Prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a Case Where the Allegation is Substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals Returning to Work after Suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, Unfounded, False or Malicious Reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the Principal/DSL (or other senior person appointed by the Principal) will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, Unfounded, False or Malicious Allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and Information Sharing

The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation

- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the School will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning Lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent Allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns That Do Not Meet the Harm Threshold

The section is based on 'Section 2: Concerns That Do Not Meet the Harm Threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-level Concerns

The term 'low-level' concern is any concern – no matter how small – 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 at the local authority

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

- Being overly 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

Sharing Low-level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to Low-level Concerns

If the concern is raised via a third party, the Principal (or a senior person appointed by the Principal) will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct.

Record Keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this policy, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

<i>Policy author / reviewer:</i>	<i>Policy date / review date:</i>	<i>Next review due:</i>
Paul Bambrough	September 2021	September 2022