

# ST EDMUND'S COLLEGE AND PREP SCHOOL: SAFEGUARDING & CHILD PROTECTION POLICY

Important Contacts Safeguarding & Child Protection			2
<b>SECTION A: TERMS OF REFERENCE</b>			4 - 16
A	1	Terminology	
A	2	Related policies	
A	3	Policy statement	
A	4	Overview of policy	
A	5	Roles and responsibilities	
<b>SECTION B: SAFEGUARDING &amp; PREVENTION</b>			17 - 31
B	1	Good practice guidelines	
B	2	Abuse of trust	
B	3	Training	
B	4	Safer recruitment	
B	5	Recognising abuse	
B	6	Indicators of abuse: when to be concerned	
B	7	Child on child abuse (peer on peer abuse)	
B	8	Impact of abuse	
B	9	Child who is subject to a CP plan	
B	10	Visitors	
B	11	E-safety	
B	12	Extended school and off-site arrangements	
B	13	Boarding: safeguarding statement	
B	14	Independent listeners for boarders	
<b>SECTION C: TAKING ACTION</b>			32 - 45
C	1	Taking action: SE's procedures	
C	2	Dealing with a disclosure	
C	3	Record keeping	
C	4	If you suspect a student is at risk	
C	5	What to do if a student is missing, including EYFS	
C	6	Reporting directly to CP agencies	
C	7	Allegations against students	
C	8	Harm from outside the school	
C	9	Former students	
C	10	Safeguarding concerns & allegations involving SEC & SEP staff, including volunteers, supply staff and contractors	
C	11	Support for staff	
C	12	EYFS: failure to collect, Nutrition Guidance, Toileting and Privacy, Staff Mobile Phones and Photography	
C	13	Complaints procedure	
<b>SECTION D: APPENDICES</b>			47 - 65

**Important Contacts Safeguarding & Child Protection**

Lucy Dunhill	Assistant Head (Safeguarding & Wellbeing) St Edmund's College, DSL <a href="mailto:ldunhill@stedmundscollege.org">ldunhill@stedmundscollege.org</a>	01920 824263 01920 824332
Liam Woodward	Head of Rhetoric St Edmund's College, Deputy DSL <a href="mailto:lwoodward@stedmundscollege.org">lwoodward@stedmundscollege.org</a>	01920 824222
Marie-Christine Simon	Head of Bounds St Edmund's College, Deputy DSL <a href="mailto:msimon@stedmundscollege.org">msimon@stedmundscollege.org</a>	01920 824219
Vicky Penfold	Head of EYFS/Nursery Teacher St Edmund's Prep School, DSL (Prep School & EYFS) <a href="mailto:vpenfold@stedmundscollege.org">vpenfold@stedmundscollege.org</a>	01920 824284
Steven Cartwright	Headmaster, St Edmund's Prep School St Edmund's Prep School, Deputy DSL <a href="mailto:scartwright@stedmundscollege.org">scartwright@stedmundscollege.org</a>	01920 824242
Matthew Mostyn	Headmaster, St Edmund's College Designated Senior Manager (DSM)	01920 824204
Paul Raynes	Chair of Governors <a href="mailto:chair@stedmundscollege.org">chair@stedmundscollege.org</a>	01920 824203
Jane Ranzetta	Governor in charge of Child Protection <a href="mailto:jranzetta@stedmundscollege.org">jranzetta@stedmundscollege.org</a>	01920 824203
Hertfordshire Local Authority Designated Officer (LADO)	<a href="mailto:LADO.Referral@hertfordshire.gov.uk">LADO.Referral@hertfordshire.gov.uk</a> Tony Purvis <a href="mailto:Tony.Purvis@hertfordshire.gov.uk">Tony.Purvis@hertfordshire.gov.uk</a> Marrie Moat <a href="mailto:marrie.moat@hertfordshire.gov.uk">marrie.moat@hertfordshire.gov.uk</a> Andrea Garcia- Sangil <a href="mailto:andrea.garcia-sangil@hertfordshire.gov.uk">andrea.garcia-sangil@hertfordshire.gov.uk</a>	01992 556979 01992 555420 01992 556372
Hertfordshire Senior Child Protection School (Generic & Non Urgent advice)	Kassiane Papageorgiou	01992 588168
Multi Agency Safeguarding Hub (M.A.S.H) (Specific Cases Advice)		0300 123 4043
Essex Children's Services		0345 6037627
Joint Child Protection Investigation Team -		01707 354000
Non-emergency Police Number		101
Buntingford Police Station (Local Police)		01763 274272

**SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

Hertford Police Station		01992 533 330
DfE dedicated telephone helpline and mailbox for non-emergency advice for staff & governors	<a href="mailto:Counter.extremism@education.gov.uk">Counter.extremism@education.gov.uk</a>	0207 340 7264
Hertfordshire Safeguarding Children Partnership Team	<a href="mailto:Admin.hscp@hertfordshire.gov.uk">Admin.hscp@hertfordshire.gov.uk</a>	01992 588757
Childline		0800 1111
NSPCC Helpline		0808 8005000
Disclosure and Barring Service	PO Box 181, Darlington, DL1 9FA	0300200190
The Children's Rights Director for England	Roger Morgan	<a href="tel:02077838330">020 7783 8330</a>
Operation Encompass – advice and helpline service for all staff members in educational settings who may be concerned about children who have experienced domestic abuse		0204 513 9990 (available 8am-1pm, Monday to Friday)

## SECTION A: TERMS OF REFERENCE

### A1 Terminology

Throughout this Policy, the Designated Safeguarding Lead (DSL) for St Edmund's College is the Assistant Head (Safeguarding & Wellbeing) and the Designated Safeguarding Lead (DSL) for St Edmund's Prep School is the Deputy Head of St Edmund's Prep School. There is a designated member of staff who is responsible for Child Protection matters in the EYFS setting.

For both St Edmund's College and St Edmund's Prep School, the **Designated Senior Manager (DSM)** is the Headmaster of St Edmund's. There is a School **Governor** with specific responsibility for Child Protection.

#### Personnel:

##### College:

Designated Safeguarding Lead: Mrs L Dunhill (Overarching responsibility College & Prep)  
Deputy Designated Safeguarding Lead: Mr L Woodward  
Miss M-C Simon

##### Prep School:

Designated Safeguarding Lead (Prep & EYFS): Mrs V Penfold  
Deputy Designated Safeguarding Lead: Mr S Cartwright

##### College & Prep:

Designated Senior Manager: Mr M Mostyn  
School Governor: Mrs J Ranzetta

**Safeguarding** and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online;
- Preventing impairment of children's mental health and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Promoting the upbringing of children with their birth parents, or otherwise their family network through kinship care arrangement, whenever possible and whether this is in the best interest of the children
- Taking action to enable all children to have the best outcomes

*(Working Together to Safeguard Children)*

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

**Staff** refers to all those working for or on behalf of the school, full time or part time, including supply staff, in either a paid or voluntary capacity and contractors.

**Child** refers to any young person who has not yet reached their 18th birthday. However, the policy covers all students, including those who are over the age of 18, in line with the school duty of care to all its students, including those already 18.

## ***SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY***

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**School** refers to St Edmund's College & Prep.

**HSCP** refers to Hertfordshire Safeguarding Children Partnership

**HSM** refers to Housemaster/Housemistress

**HOY** refers to Head of Year

**PSHE** refers to Personal, Social and Health Education

### **A2 Related safeguarding portfolio policies:**

- Behaviour
- Code of Conduct for Staff
- Complaints procedure
- Grievance and Disciplinary
- Prevention of Bullying
- Prevention of Cyberbullying
- Safer Recruitment and Selection
- SEN
- Restraint and Physical Intervention
- Whistle blowing
- IT, Internet and E-Safety Policy

**A3 Policy Statement:**

*To realise – in mind, body and spirit – the full potential of every member of the St Edmund’s Family, through Catholic values, learning, service and leadership.*

*Avita Pro Fide*

*St Edmund’s is committed to ensuring the welfare and protection of children in its care and this commitment is a fundamental part of the role of every person employed by St Edmund’s.*

The Governors and staff believe that the very highest priority must be given at all times to our moral and statutory duty to safeguard and promote the welfare and safety of our students. In line with our Mission Statement we aim to be a community with an ethos in which students feel secure, valued and listened to, and in which their views are taken seriously and responded to appropriately.

Child abuse is an unacceptable aspect of society. St Edmund’s believes that children should be protected from abuse in all its forms. Safeguarding is defined as protecting children from maltreatment, preventing impairment of children’s mental and physical health and/or development, ensuring that children grow up in the provision of safe and effective care and optimising children’s life chances.

Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. 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.

Everyone who comes into contact with children and their families has a role to play in safeguarding children, identifying concerns, sharing information and taking prompt action where necessary. College and Prep staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. We form part of the wider safeguarding system for children. This system is described in statutory guidance *Working Together to Safeguard Children 2018 (updated July 2022)*. It is incumbent upon us to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

This Safeguarding & Child Protection Policy forms part of a portfolio of policies which relate to the safeguarding responsibilities of the school. Our aim, with the help of these policies, is to create and embed a culture of openness, trust and transparency. In particular, this policy should be read in conjunction with the portfolio of safeguarding policies including the Safer Recruitment and Selection Policy, Code of Conduct for Staff, Behavioural Standards Policy, Anti Bullying Policy, Boarding Policy and Whistle Blowing Policy. These policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an interim review.

St Edmund’s College and St Edmund’s Prep School strive to provide the very highest standards of education and pastoral support for the children in its care. They recognise both its legal and its moral responsibilities for the care and protection of all children. We will operate safe recruitment procedures at all times in accordance with Hertfordshire and local inter-agency procedures. If a concern arises over the welfare of a child, we will adhere to the Hertfordshire Safeguarding Children Partnership (HSCP) procedures which can be found at <https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Hertfordshire-Safeguarding-Children-Partnership/hscp.aspx> and <http://hertsscb.proceduresonline.com/>

St Edmund’s College and St Edmund’s Prep School will have regard to and comply with (unless exceptional circumstances arise):

- Section 157 and 175 of Education Act 2002 and the Education (Independent Schools

## ***SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY***

Standards) (England) Regulations 2003 which require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are pupils at the school.

- [Keeping Children Safe in Education Sept 2025](#)
- [Working Together to Safeguard Children](#) (December 2023)
- [Working Together to Improve School Attendance](#) (August 2024)
- Hertfordshire Guidelines for Child Protection
- Archdiocese Guidelines for Child Protection
- Requirements of Independent Schools Inspectorate
  
- [Safeguarding Children and Safer Recruitment in Education](#)
- [“Dealing with allegations of abuse against teachers and other staff”](#)
- [Prevent Duty Guidance, issued under section 29 of the Counter Terrorism Security Advisors](#), updated March 2024
- [Section 36\(7\) and section 38\(6\) of the CTSA 2015 in respect of Channel](#)
- Relationships Education, Relationships and Sex Education (RSE) and Health education
- Other legislation and publications as appropriate.
- [Behaviour in schools](#)

All College and Prep staff (including volunteers) are expected to have read Part 1 and Annex B of the statutory Government Guidance *Keeping Children Safe in Education*. This document is provided to all staff each time it changes, and to new staff as part of their induction.

#### **A4 Overview of Safeguarding & Child Protection Policy**

If a concern arises over the welfare of a child, the School has a legal obligation to follow current child protection procedures. Sometimes this will mean sharing our concerns with Social Services or other agencies before contacting parents if we feel this is in the best interest of the child's safety. Our belief is that it is better to be overcautious than to risk harm being caused to a child.

Where appropriate an appropriate member of staff will try to discuss those concerns openly with the parents/carers and we will work as closely as possible in partnership with them to find a solution.

The Assistant Head (Safeguarding & Wellbeing) (College) and Deputy Head (Prep), as DSLs, have the responsibility for co-ordinating Child Protection procedures within St Edmund's College and St Edmund's Prep School and liaising with other agencies. Where the DSL is not available for any reason, the Designated Deputy Safeguarding Lead (Head of Rhetoric and Head of Bounds) for St Edmund's College or Assistant Head St Edmund's Prep School) will assume the role of DSL. The Deputy DSL for St Edmund's Prep School is the designated person for Child Protection matters in the EYFS setting. The DSLs/DSLs have been trained in Child Protection matters and this training in Child Protection and inter-agency working will be updated every two years.

All teaching and non-teaching staff must be alert to signs of abuse. Training will be provided for the Headmaster (DSM) and for all staff, which will be updated every three years if face to face training or updated every two years if completed online. All part-time and voluntary staff are made aware of Child Protection procedures through induction (refer to B3 Training section) and through the use of the 'Visiting Staff Child Protection Information Leaflet' (see appendix 2) given to all staff containing the basic details of Child Protection procedures in St Edmund's College and St Edmund's Prep School. Our staff are aware of our procedures for handling suspected cases of the abuse of students, including procedures to be followed if a member of staff is the person suspected through the arrangements of this policy.

There are different referral systems:

- disclosure from a student or concern raised by a member of staff about a student (refer to section C2 – Dealing with a Disclosure)
- allegations against staff (refer to section C10 – Safeguarding concerns and allegations involving SEC and SEP staff, including volunteers, supply staff and contractors)

Parents are made aware of the School's arrangements for Child Protection through this policy and of the fact that in the interests of the child this may require cases to be reported to the Education and Social Services Departments without the parents themselves being informed.

HSM/HOY are briefed on action to take should they receive allegations of abuse and they receive a leaflet to remind them.

#### **What College and Prep staff should do if they have a concern about a child**

If staff members have concerns about a child they should raise these with the Designated Safeguarding Lead. The safeguarding lead will usually decide whether to make a referral to children's social care, but it is important to note that any staff member can refer their concerns to children's social care directly. Where a child and family would benefit from coordinated support from more than one agency (for example education, health, housing, police) there should be an inter-agency assessment. These assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

could be a teacher, special educational needs coordinator, General Practitioner (GP), family support worker, and/or health visitor.

**Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. This will involve reporting to children's social care (and if appropriate the police) immediately. Staff should report to the DSL, who can make a referral to Children's Social Care and/or the police if a crime has been committed.**

**Anybody can make a referral, but the DSL should be informed as soon as possible. The referral should be made as soon as possible, immediately or at least within 24 hours or one working day.**

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

The Department for Education has produced advice [What to do if you are worried a child is being abused 2015- Advice for practitioners](#) to help practitioners identify child abuse and neglect and take appropriate action in response.

Where information needs to be shared, the School will have regard to the Data Protection Act 2018. However, this will not act as a barrier to promoting the welfare and protecting the safety of children.

Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. This will lead to inter-agency processes using local processes. Staff should report to the DSL, who will refer to Children's Social Care within 24 hours or within one working day. A child in need is defined under section 17(10) of the Children Act 1989, as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

### **What School staff should do if they have concerns about another staff member**

If staff members have concerns about another staff member then this should be referred to the Headmaster. Where there are concerns about the Headmaster, this should be referred to the Chair of Governors. Where there are concerns about the Chair of Governors, this should be referred to the police or directly to the LADO. Full details can be found in Part 4 of Keeping Children Safe in Education.

### **What School staff should do if they have concerns about safeguarding practices within St Edmund's College & Prep School.**

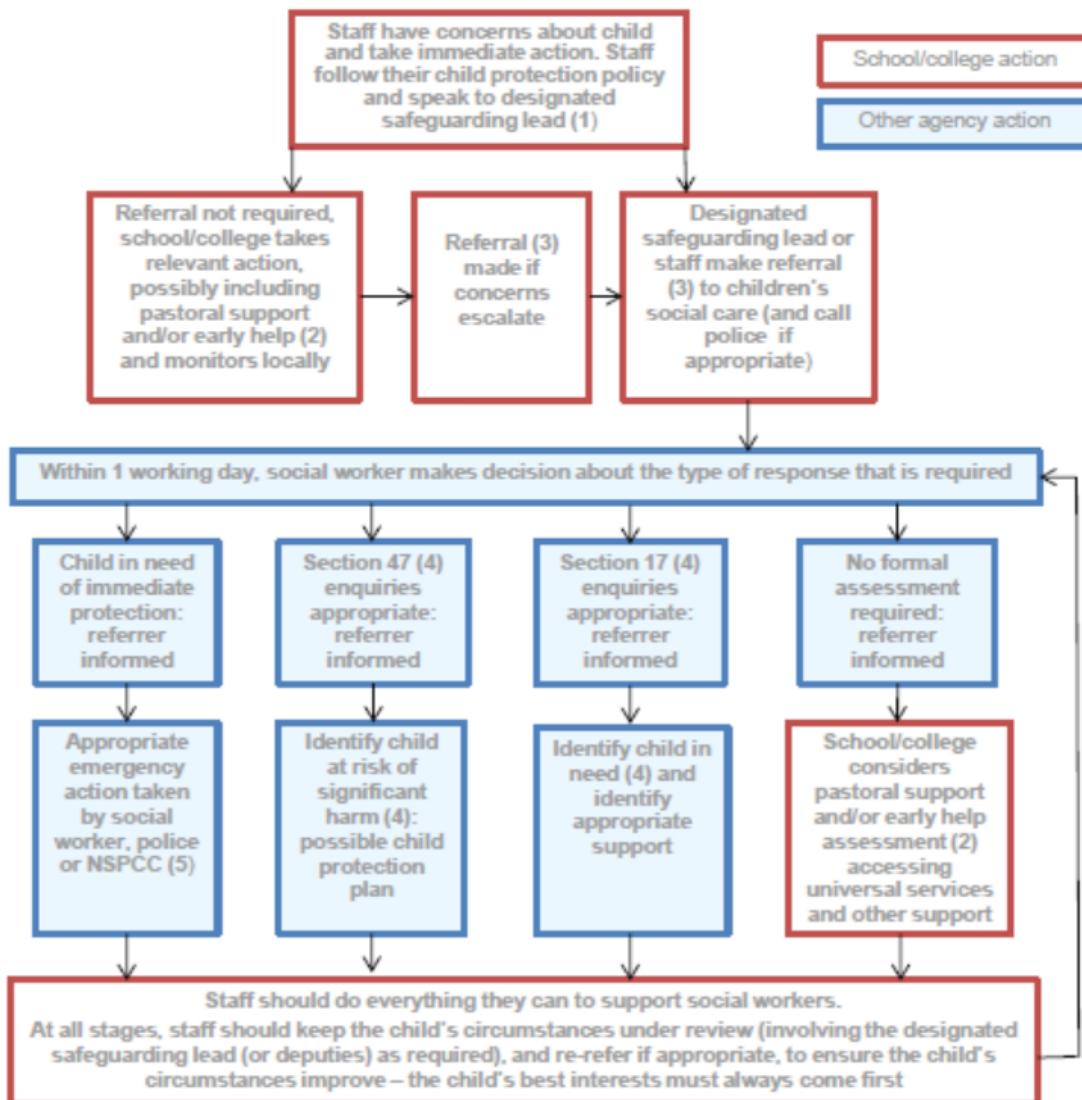
Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in School's safeguarding regime. The School has a whistleblowing policy. This is referred to during staff briefings and as part of new staff induction. Through this, staff can raise concerns and these will be taken seriously by the School.

Where a staff member feels unable to raise the issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. For

*SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY*

example, the NSPCC whistleblowing helpline (0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>)

## Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

## A5 Roles & Responsibilities

### **The Headmaster: the Designated Senior Manager (DSM)**

- ensures that the Safeguarding & Child Protection policy and procedures are implemented and followed by all staff;
- allocates sufficient time and resources to enable the DSLs and DDSLs to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and if necessary in accordance with the whistle blowing procedures;
- Contact the Local Authority Designated Officer (LADO) for concerns about staff members, including volunteers;
- Ensure that contact is made with the Disclosure and Barring Service where a person is dismissed or has left due to risk/harm to a child
- Contact the Police in cases where a crime may have been committed.

### **The Designated Safeguarding Lead (DSL) – Child Protection Officer**

Throughout this note, reference to the DSL refers to the Child Protection Officer who takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place. The DSL must be appropriately trained and have an understanding of HSCP procedures.

The broad areas of responsibility for the designated safeguarding lead are:

#### **Manage referrals**

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required. [NPCC-When to call the police](#) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

## **Work with others**

- Liaise with the Head to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

## **Undertake training**

The designated safeguarding lead and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

The designated safeguarding lead will undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the School’s child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- 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;
- Obtain access to resources and attend any relevant or refresher training courses; and
- 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.

## Raise Awareness

- The designated safeguarding lead should ensure the School's child protection policies are known, understood and used appropriately;
- Ensure the School's child protection policy is reviewed whenever necessary and at least annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- Link with the local HSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

## Child protection file

- Where children leave the School ensure their child protection file is transferred to the new School as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

## Availability

- During term time the designated safeguarding lead (or a deputy) will always be available (during School hours) for staff in the School to discuss any safeguarding concerns.

## Contingency Planning

- To ensure there is effective cover for the DSL/DDSL role, the Headmaster, Deputy Heads, , Head of Boarding and all Housemasters/mistresses are level 3 training. In the event of significant disruption to the DSL/DDSL role, the Headmaster and Deputy Head Pastoral would assign the roles amongst those most experienced and qualified,

## The Deputy Designated Safeguarding Lead (DDSL)

The Deputy Designated Safeguarding Leads are appropriately trained and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, the Deputy DSL will assume all of the functions above.

## The Governing Body

The Governing body must ensure that they comply with their duties under legislation. They must also have regard to the guidance *Keeping children safe in education* to ensure that the policies, procedures and training in their School are effective and comply with the law at all times. There is a Governor responsible for taking leadership responsibility for the School's safeguarding arrangements.

The Governing body ensures that:

- all staff & governors receive appropriate safeguarding training and child protection (including online which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. (See paragraphs 142 and 143 of KCSIE for further information regarding filtering and monitoring standards.
- there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. These include: an effective child

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

protection policy and a staff code of conduct, which are updated whenever necessary and at least annually. Also, that they are also publicly available and provided to all staff, including temporary teachers, supply staff, volunteers and contractors

- a DSL for Child Protection is appointed, who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic Child Protection training, this person will undertake the role of safeguarding lead
- the College and Prep contributes to inter-agency working in line with statutory guidance *Working Together to Safeguard Children December 2023*
- safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures put in place by the Hertfordshire Safeguarding Children Partnership (HSCP)
- safeguarding arrangements are reviewed annually and the policy made available to parents through the website and upon request
- one of its members is nominated to liaise with the local authority and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headmaster, or member of governing body of an independent school
- there is a training strategy that ensures all staff, including the Headmaster, receive Child Protection training, with refresher training at three-yearly intervals and that the DSLs should receive refresher training at two-yearly intervals
- people who pose a risk of harm are prevented from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised
- there are procedures in place to handle concerns/allegations against members of staff, including the Headmaster, and volunteers, supply staff and contractors
- there are procedures in place to handle allegations against other children
- There are safeguarding responses to children who go missing from education, particularly on repeat occasions.
- the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback
- members do not promise confidentiality to the child and always act in the interests of the child
- a teacher is appointed to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training and that staff have the skills, knowledge and understanding necessary to keeping looked after children safe
- appropriate safeguarding responses to children who go missing are put in place, particularly on repeat occasions, to help identify any risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

### **DSL**

Further notes:

A Governor is appointed as Child Protection Governor (CPG) who has specific responsibility for Child Protection. At each meeting of the Academic Sub-Committee of the Governors, there is a standing agenda item on Child Protection. The DSLs and DSM report to Governors under this heading any incidents that have occurred and the effectiveness/outcome of the action taken. A report is compiled annually by the DSL and the CPG and this is then reported to the full Board of Governors for discussion which will be carefully minuted, including any actions which need taking. The Policy itself is reviewed annually by the Academic Sub-Committee of Governors. It is important that any deficiencies or weaknesses found in this policy are remedied without delay and the fact that they have been remedied should be reported at the formal review. The full board approve the findings of the annual review.

The Chair of the Governing body is nominated as the person responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Head.

The DSLs are nominated as the safeguarding leads for the College and Prep and teachers are nominated to promote the educational achievement of children who are looked after.

### **School Staff:**

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

Liaise with the Designated Safeguarding Lead regarding any matter which may be a cause for concern regarding the welfare of a child.

Be prepared to identify children who may benefit from early help; providing support as soon as a problem emerges at any point in the child's life, from the foundation years through to the teenage years. All staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime;
- is frequently missing/goes missing from care or from home;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit. Schools remain responsible for the safeguarding of that pupil & should be satisfied that the placement meets the pupil's needs.
- is at risk of modern slavery, trafficking or sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is privately fostered child; and
- is missing education, or persistently absent from school, or not in receipt of full time education
- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be further compounded where children who are LGBT lack a trusted adult with whom they can be open (the College is following the review and gender questioning guidance consultation. The policy will be updated when the final guidance document is published).

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupils' need. See paragraphs 168 – 171 of KCSIE for further information.

Follow the School procedures and if necessary referral processes set out in paragraphs 59-67 of Keeping Children Safe in Education.

Maintain public trust in the teaching profession as part of their professional duties

Be aware of systems within the School which support safeguarding including:

- The Safeguarding and Child Protection Policy;
- The staff Code of Conduct and Good Practice Guidelines
- The role of the Designated Safeguarding Lead.

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

Ensure that their safeguarding and child protection training is regularly updated.

Be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.

**Know what to do if a child tells them he/she is being abused or neglected.** Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the Designated Safeguarding Lead and children's social care.

Never promise a child that they will not tell anyone about an allegation- as this may ultimately not be in the best interests of the child.

**All** School staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

Maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the designated safeguarding lead.

## **SECTION B – PREVENTION & SAFEGUARDING**

### **B1 Good Practice Guidelines**

To meet and maintain our responsibilities towards students we need to agree standards of good practice. Good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them
- encouraging positive and safe behaviour among students
- being a good listener
- being alert to changes in students' behaviour
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding our Safeguarding & Child Protection policy and guidance documents on wider safeguarding issues, for example bullying, physical contact and information-sharing
- asking the student's permission before doing anything for them of a physical nature, such as assisting with dressing, physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.

### **B2 Abuse of trust**

All our staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

## ***SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY***

The Code of Conduct Policy sets out our expectations of staff, with reference to the 'Guidance for Safer Working Practices' document (see Appendix 1).

### **B3 Training**

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff, including temporary and volunteer staff and Governors will receive training during their induction. During this induction, they will be informed of the identities of the DSLs, and the DSM. The DSL will go through with them the Hertfordshire safeguarding and Child Protection presentation (they also receive a copy of this for future reference). They will also be given SEC quick reference guides, guidance of good practice for staff, a copy of the cause for concern referral form and a copy of part one & Annex B of Keeping Children safe in Education.

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

All staff, including the Head and Governors will receive training that is updated at least every three years and the DSLs and DDSLs will receive training updated at least every two years, including training in inter-agency procedures. Supply staff and other visiting staff will be given St Edmund's 'Visiting Staff Child Protection Information Leaflet' (see: appendix 2).

- The Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working and will attend refresher training at two yearly intervals. The Deputy Designated Safeguarding Leads with responsibilities for child protection issues, as detailed in this policy, also undertake this same training.
- The Headmaster and staff undertake training in child protection and safeguarding and this is updated at least every three years.
- At least once a year, all staff and volunteers who work in the school are reminded of the provisions in this Child Protection and Safeguarding Policy, including Prevent and online safety. Further information regarding Online Safety can be found in paragraphs 1354 - 148 & Annex B of KCSIE).
- Every recruitment panel includes at least one member of staff who has undergone safer recruitment training with refresher training every five years.
- The Governors will receive appropriate and up-to-date child protection and safer recruitment training to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities.
- If they have not attended the training for staff generally, temporary and voluntary staff who work with children are made aware of the School's arrangements for safeguarding and their responsibilities as above.
- The Executive Assistant (Pastoral) will keep a central record of all safeguarding training undertaken by members of staff and others.

### B4 Safer Recruitment

St Edmund's endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education (pages 52-86) together with the local authority guidelines and St Edmund's Safer Recruitment and Selection Policy (See Staff Handbook).

All staff, including volunteers and contractors will undergo necessary checks as required in part 3 of Keeping Children Safe in Education.

Safer recruitment means that all applicants will:

- complete an application form;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of identity and qualifications;
- be checked and their role registered through the Disclosure and Barring Service;
- be interviewed.

All new members of staff will undergo an induction that includes familiarisation with the St Edmund's Safeguarding & Child Protection Policy, which includes online safety. This includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring (see paragraph 141, 142 & 143 of KCSIE for further information). During the induction process and in line with the induction policy, new members of staff are provided with the following:

- Child Protection 'Quick Reference' leaflet
- Child Protection quick reference laminated card
- Copy of the 'Safeguarding Children Induction for Adults Working in Schools' powerpoint presentation
- Good Practice Guidance for Staff sheet
- Keeping Children Safe in Education: Information for all school and college staff
- Student Behaviour Policy
- Permanent Exclusion and Removal: Review Procedure

All staff sign a 'Confirmation of receipt of Safeguarding & Child Protection Policy' form (see: appendix 3).

## B5 Recognising abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Through the PHSE programme, the School teaches children about staying safe. Topics covered include: road safety, travelling on School buses and public transport, protection of mobile phones and property, trespassing, getting lost, foreign travel, bullying, on-line safety, medical conditions, alcohol, smoking, drugs, lifestyle, exercise, healthy eating etc.

Staff and volunteers should understand that they are not making a diagnosis, only receiving concerns. None of the signs listed above may actually prove that a child is being abused and these indications should not be taken as proof. They may be indicators, which when put into context, provide justification for action.

### Types of abuse, neglect and exploitation

**Abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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.

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. See section B7.

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

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

(Taken from Keeping Children Safe in Education)

Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk..

Safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse, causing physical harm, sexual violence, sexual assault and sexual harassment, upskirting, sharing of nudes and semi-nudes images and videos, initiation/hazing type violence and rituals and gender based violence (see sections B7 and C7). As with any form of abuse, this must be reported to the Designated Safeguarding Lead and appropriate action taken to protect.

Protecting children from Radicalisation is part of the school's wider safeguarding duties. Staff should use their professional judgment in identifying children who might be at risk from radicalisation and should discuss any concerns with the DSL. The DSL will act proportionately and this may include making a referral to the Channel programme.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for Schools can be found on the TES, MindEd and the NSPCC websites. School staff can access government guidance as required on the issues listed below via GOV.UK or other government websites or on pages 141-163 of Annex B of KCSIE:

- Bullying including cyberbullying
- Child abduction and community safety incidents
- Children and the courts
- Children missing education - The School must inform the local **authority of any student who fails to attend regularly, or has been absent without permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority. If a student is missing during the school day please refer to section C5.**
- Children who are absent from education – children absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation, particularly county lines (see paragraph 177 of KCSIE)
- Child missing from home or care
- Children with family members in prison
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) – Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
  - Child sexual exploitation (CSE) – is a form of sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. . The victim may have been sexually exploited even if the sexual activity appears consensual. For further information, please see Annex B of KCSIE.

- Child criminal exploitation (CCE) – Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, staff should be aware that girls are at risk of criminal exploitation too. It is also important to be aware that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. For further information, please see Annex B of KCSIE.
- County lines – is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money.
- Cybercrime - 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).
- Domestic Abuse – can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse. All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.
- Homelessness
- 'Honour-based' abuse (HBA), which includes female genital mutilation (FGM), forced marriage, and practices such as breast ironing
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM) - . Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. This matter should also be reported to the DSL/DDSL.
- Forced marriage – since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health – all staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professional 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 at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and follow the correct safeguarding procedures.
- Modern Slavery and the National Referral Mechanism - encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

- Missing children and adults strategy
- Private fostering
- Child on Child abuse
- Preventing radicalisation - The School must act according to “The Revised Prevent duty guidance: for England and Wales”
- The Prevent Duty
- Channel
- Relationship abuse
- Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
- Serious violence – all staff should be aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or involved with, individuals associated with criminal networks or gangs. There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experience child maltreatment or been involved in offending, such as theft or robbery.
- Sexual violence and sexual harassment between students. Please refer to staff Child Protection briefing presentation which is available on request. Further information can also be found in Part 5 of KCSIE.
- Trafficking
- Upskirting - which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Anyone of any gender, can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

### Additional Support or Guidance:

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	Centre of Expertise on Child Sexual Abuse: <a href="https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns//">https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns//</a>	CSA Centre
	What to do if you're worried a child is being abused: <a href="https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2">https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2</a>	DfE advice
	Domestic abuse: Various Information/Guidance: <a href="https://www.gov.uk/guidance/domestic-violence-and-abuse">https://www.gov.uk/guidance/domestic-violence-and-abuse</a>	Home Office
	Faith based abuse: National Action Plan <a href="https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief">https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief</a>	DfE advice
	Relationship abuse: disrespect nobody <a href="https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/">https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/</a>	Home Office website
	Tackling Child Sexual Abuse Strategy: <a href="https://www.gov.uk/government/publications/tackling-child-sexual-abuse-strategy">https://www.gov.uk/government/publications/tackling-child-sexual-abuse-strategy</a>	Home Office Policy Paper

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

	Together we can stop child sexual abuse: <a href="https://stopabusetogether.campaign.gov.uk/">https://stopabusetogether.campaign.gov.uk/</a>	HM Government Campaign
Bullying	Preventing bullying including cyberbullying: <a href="https://www.gov.uk/government/publications/preventing-and-tackling-bullying">https://www.gov.uk/government/publications/preventing-and-tackling-bullying</a>	DfE advice
Children missing from education, home or care	Children missing education: <a href="https://www.gov.uk/government/publications/children-missing-education">https://www.gov.uk/government/publications/children-missing-education</a>	DfE statutory guidance
	Child missing from home or care: <a href="https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care">https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care</a>	DfE statutory guidance
	Children and adults missing strategy: <a href="https://www.gov.uk/government/publications/missing-children-and-adults-strategy">https://www.gov.uk/government/publications/missing-children-and-adults-strategy</a>	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders: <a href="https://www.nicco.org.uk/">https://www.nicco.org.uk/</a>	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Children and the court system	5 – 11 year olds: <a href="https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds">https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds</a>  12-17 year olds: <a href="https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds">https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds</a>	DfE advice
Child Exploitation	Trafficking: safeguarding children <a href="https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance">https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance</a>	DfE and HO guidance
	Care of unaccompanied and trafficked children: <a href="https://www.gov.uk/government/publications/care-of-unaccompanied-and-trafficked-children">https://www.gov.uk/government/publications/care-of-unaccompanied-and-trafficked-children</a>	DfE statutory guidance
	Modern slavery: how to identify and support victims: <a href="https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims">https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims</a>	HO statutory guidance
	Child exploitation disruption toolkit: <a href="https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit">https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit</a>	HO Statutory guidance
	County Lines Toolkit for Professionals: <a href="https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit">https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit</a>	The Children's Society in partnership with Victim Support and National Police Chiefs' Council
	Preventing Child Sexual Exploitation: <a href="https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation">https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation</a>	The Children's Society and Home Office
	Multi-agency practice principles for responding to child exploitation and extra-familial harm: <a href="https://tce.researchinpractice.org.uk/">https://tce.researchinpractice.org.uk/</a>	TCE
Confidentiality	Gillick Competency Fraser Guidelines: <a href="https://learning.nspcc.org.uk/child-protection-system/gillick-competence-fraser-guidelines">https://learning.nspcc.org.uk/child-protection-system/gillick-competence-fraser-guidelines</a>	NSPCC
Drugs	Drug strategy 2021: <a href="https://www.gov.uk/government/publications/from-harm-to-hope-a-10-year-drugs-plan-to-cut-crime-and-save-lives/from-harm-to-hope-a-10-year-drugs-plan-to-cut-crime-and-save-lives">https://www.gov.uk/government/publications/from-harm-to-hope-a-10-year-drugs-plan-to-cut-crime-and-save-lives/from-harm-to-hope-a-10-year-drugs-plan-to-cut-crime-and-save-lives</a>	Home Office strategy

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

	Drug and Alcohol education – teacher guidance evidence review: <a href="https://www.pshe-association.org.uk/curriculum-and-resources/resources/drug-and-alcohol-education-%E2%80%94-teacher-guidance">https://www.pshe-association.org.uk/curriculum-and-resources/resources/drug-and-alcohol-education-%E2%80%94-teacher-guidance</a>	PSHE Association website
	Information and advice on drugs: <a href="https://www.talktofrank.com/">https://www.talktofrank.com/</a>	Talk to Frank website
(so called) "Honour Based Abuse" including FGM and Forced Marriage	Female genital mutilation: information and resources: <a href="https://www.gov.uk/government/collections/female-genital-mutilation">https://www.gov.uk/government/collections/female-genital-mutilation</a>	Home Office
	Female genital mutilation: multi agency statutory guidance: <a href="https://www.gov.uk/government/publications/multi-agency-guidance">https://www.gov.uk/government/publications/multi-agency-guidance</a>	DfE, DH, and HO statutory guidance
	Forced Marriage Unit: <a href="mailto:fmu@fcdo.gov.uk">fmu@fcdo.gov.uk</a> / 020 7008 0151  <a href="https://www.gov.uk/guidance/forced-marriage">https://www.gov.uk/guidance/forced-marriage</a>	Statutory guidance
	FGM resource pack: <a href="https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack">https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack</a>	HM Government
Health and Wellbeing	Promoting and supporting mental health and wellbeing in schools and colleges: <a href="https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges">https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges</a>	DfE
	Overview: Fabricated or induced illness:  <a href="https://www.nhs.uk/mental-health/conditions/fabricated-or-induced-illness/overview/">https://www.nhs.uk/mental-health/conditions/fabricated-or-induced-illness/overview/</a>	NHS advice
	Rise Above: Free PSHE resources on health, wellbeing and resilience: <a href="https://www.pshe-association.org.uk/curriculum-and-resources/resources/rise-above-schools-teaching-resources">https://www.pshe-association.org.uk/curriculum-and-resources/resources/rise-above-schools-teaching-resources</a>	Public Health England Resources
	Medical Conditions: supporting students at school: <a href="https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions-3">https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions-3</a>	DfE statutory guidance
	Mental Health and behaviour: <a href="https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2">https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2</a>	DfE advice
Homelessness	Homelessness: how local authorities should exercise their functions: <a href="https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities">https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities</a>	Department for Levelling Up, Housing and Communities guidance
Information Sharing	Government information sharing advice: <a href="https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice">https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice</a>	DfE advice
	Information Commissioner's Office: Data Sharing Information hub: <a href="https://ico.org.uk/for-organisations/data-sharing-information-hub/">https://ico.org.uk/for-organisations/data-sharing-information-hub/</a>	ICO
Online safety-advice(see also paragraphs 135 -	CEOP Education: <a href="https://www.ceopeducation.co.uk/">https://www.ceopeducation.co.uk/</a> CEOP Safety Centre: <a href="https://www.ceop.police.uk/safety-centre/">https://www.ceop.police.uk/safety-centre/</a>	CEOP

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

148 & further links can be found in Annex B of KCSIE)	Childnet - Guidance for schools on cyberbullying: <a href="https://www.childnet.com/resources/cyberbullying-guidance-for-schools/">https://www.childnet.com/resources/cyberbullying-guidance-for-schools/</a>	Childnet
	Teaching online safety in schools: <a href="https://www.gov.uk/government/publications/teaching-online-safety-in-schools">https://www.gov.uk/government/publications/teaching-online-safety-in-schools</a>	DfE advice
	Education for a connected world: <a href="https://www.gov.uk/government/publications/education-for-a-connected-world">https://www.gov.uk/government/publications/education-for-a-connected-world</a>	UKCIS guidance
	Guidance for sharing nudes and semi nudes: <a href="https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people">https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people</a>	UKCIS guidance
	External Visitors guidance: <a href="https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings">https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings</a>	UKCIS guidance
	Harmful online challenges and online hoaxes: <a href="https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes">https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes</a>	UK Government
Private Fostering	Private Fostering: Local Authorities: <a href="https://www.gov.uk/government/publications/children-act-1989-private-fostering">https://www.gov.uk/government/publications/children-act-1989-private-fostering</a>	DfE – statutory guidance
Radicalisation & The Prevent Duty	Prevent Duty Guidance: <a href="https://www.gov.uk/government/publications/prevent-duty-guidance">https://www.gov.uk/government/publications/prevent-duty-guidance</a>	Home Office Guidance
	Prevent Duty advice for schools: <a href="https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty">https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty</a>	DfE advice
	Educate Against Hate Website: <a href="https://educateagainsthate.com/">https://educateagainsthate.com/</a>	DfE and Home Office
	Prevent for FE and Training: <a href="https://preventforfeandtraining.org.uk/">https://preventforfeandtraining.org.uk/</a>	Education and Training Foundation (ETF)
	Extremism and Radicalisation Safeguarding Resources: <a href="https://www.lgfl.net/online-safety/resource-centre?s=13">https://www.lgfl.net/online-safety/resource-centre?s=13</a>	London Grid for Learning
	Managing risk of racialisation in your education setting: <a href="https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting">https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting</a>	DfE Guidance
NSPCC	Safeguarding children with special educational needs and disabilities (SEND): <a href="https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send">https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send</a>  Safeguarding child protection/deaf and disabled children and young people: <a href="https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#risk-and-vulnerability-factors">https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#risk-and-vulnerability-factors</a>	NSPCC

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

<b>Serious Violence / Sexual Violence</b>  <b>Further links can be found in Annex B of KCSIE</b>	Gangs and youth violence: for Schools and Colleges: <a href="https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence">https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence</a>	Home Office Advice
	Ending violence against women and girls: <a href="https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020">https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020</a>	Home Office Strategy
	Violence against women and girls: national statement of expectations for victims: <a href="https://www.gov.uk/government/publications/violence-against-women-and-girls-national-statement-of-expectations">https://www.gov.uk/government/publications/violence-against-women-and-girls-national-statement-of-expectations</a>	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges: <a href="https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges">https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges</a>	DfE advice
	Serious violence strategy: <a href="https://www.gov.uk/government/publications/serious-violence-strategy">https://www.gov.uk/government/publications/serious-violence-strategy</a>	Home Office Strategy
	Confidential chat service supporting young people concerned about their own or someone else's' sexual thoughts and behaviours: <a href="https://shorespace.org.uk/">https://shorespace.org.uk/</a>	

### **Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to 12 child suicides each year.

All incidences of bullying should be reported and will be managed through the anti-bullying procedures. All students and parents receive a copy of the Prevention of Bullying Policy on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Head and the DSL will consider implementing Child Protection procedures.

### **B6 Indicators of abuse: when to be concerned**

Physical signs define some types of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

Remember, it is the responsibility of all members of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

Staff should be concerned about a student if she/he:

- has any injury which is not typical of the bumps and scrapes normally associated with children's activities;
- regularly has unexplained injuries;
- frequently has injuries (even when apparently reasonable explanations are given);
- gives confused or conflicting explanations of how injuries were sustained;
- exhibits significant changes in behaviour, performance or attitude;

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

- indulges in sexual behaviour which is unusually explicit and/or inappropriate to his/her age;
- discloses an experience in which he/she may have been significantly harmed.
- goes missing from school or home, particularly in the case of repeated incidences.

(See appendix 6 for further examples of 'possible indicators of abuse')

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. 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 disability without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

### **B7 Child on Child Abuse (Peer on peer abuse)**

It is a recognised statistic that it is more likely that girls will be victims and boys perpetrators of child on child abuse but children may be harmed by other children or young people of any age and sex. It can happen both inside and outside of College and online. It is important that staff are aware of the potential for inappropriate student relationships and child on child abuse particularly, but not exclusively in the boarding context. All staff should be aware that safeguarding issues can manifest themselves via child on child abuse. It is also important to understand that child on child abuse can happen at any time regardless of the number of previous incidents recorded in a setting. This can include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse within intimate partner relationships;
- 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, physical behaviour, such as deliberately brushing up against someone and online sexual harassment, which may stand alone or be part of a broader pattern of abuse;
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into group and may also include an online element).

Staff duty and supervision rotas are organised to maintain vigilance during the school day and in boarding. Age appropriate RSE and PSHE will address this matter including responsibilities and consequences of being involved in this abuse. Reference to the DSL is the same as for any other form of abuse but there is also the need to look after the welfare of the alleged abuser during the procedures.

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

Child on child abuse is abuse and will never be tolerated by the School, nor passed off as “banter” or “part of growing up”. Staff must remain vigilant with all pupils, as even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported. Such instances will be dealt with under the School pastoral and disciplinary procedures and reported to the police or referred to Children’s Social care, as necessary. Care and support will be provided to both the victims and perpetrators of child on child abuse, as required.

Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, any such abuse will be referred to local agencies.

Staff will be aware of the harm caused by bullying and will use the school’s anti-bullying procedures where necessary. However, there will be occasions when a student’s behaviour warrants a response under Child Protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the Child Protection procedures will be followed for both victim and perpetrator.

### **B8 Impact of abuse**

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

### **B9 Child who is subject to a Child Protection Plan**

Particular attention will be paid by all teachers to the attendance, welfare, progress and development of any child who has been identified as at risk or who has been placed on the “Child who is Subject to a Child Protection Plan” file.

If a student leaves St Edmund’s who is known to be on the Child who is Subject to a Child Protection Plan file, the DSL will inform the social worker responsible for the case and transfer the appropriate records to the receiving school. Records on all matters related to Child Protection are kept by the DSL.

### **B10 School Watch**

Separate arrangements exist where children may be at risk from strangers who have approached other children in the neighbourhood or who have been seen acting suspiciously in other parts of Hertfordshire. Through the School Watch system, run by the Metropolitan Police in conjunction with the Education Welfare Service and institutions themselves, information is passed rapidly from school to school so that warnings can be given to teachers, parents and students as appropriate. The Headmaster is the St Edmund’s contact person for this arrangement.

### **B10 Visitors**

Visitors to St Edmund’s College should report to the Main Reception and visitors to the Prep School should report to the Prep School Main Office. Visitors will be allocated red lanyards and will be accompanied at all times.

Visiting speakers will be checked in line with recommendations in the Prevent strategy. The Prevent Duty Guidance requires the College to have clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised. The content of this section is reiterated in the College’s Safer Recruitment Policy.

The College maintains a monitor of visiting speakers which includes an assessment of the education value,

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

the age appropriateness of what is going to be delivered and whether relevant checks will be required.

As set out in the College's *Personal, Social and Health Education (PSHE) Policy* (see *Pastoral Handbook, Section Three, Document 35*), the Assistant Head (Safeguarding & Wellbeing) has oversight of the College-wide programme, with the Head of PSHE having oversight of visiting speakers for PSHE. In addition, teachers, the Head of Rhetoric and Deputy Head of Rhetoric and the Chaplaincy Co-ordinator may arrange for visiting speakers to attend the College. All College staff are aware to notify HR of any visiting speakers, whether invited by staff or pupils, and that they must be checked for suitability and must be supervised. This requirement falls within the scope of the *Prevent* duty which is further explained within the College's *Safeguarding & Child Protection Policy*.

All visiting speakers will be subject to the College's usual visitor's protocol. This will include signing in and out at Reception, the wearing of a visitor's badge at all times and being escorted and supervised by a fully vetted member of staff.

The College will obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and / or permit a speaker to attend the College. In doing so the College will always have regard to the Prevent Duty Guidance and the definitions of "extremism", "extrem" and "terrorism" as set out in *Keeping Children Safe in Education (KCSIE) September 2025* which states:

*"Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.*

*Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.*

*Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause."*

In fulfilling its Prevent Duty obligations the College does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientations, marital or civil partner status, disability or age.

The College reserves the right to obtain such information on any other person appointed to work for or at the College.

## **B11 E-Safety**

Most of our students will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

people will use these technologies to harm children. Appropriate filters and monitoring systems are in place to identify, intervene in and escalate any concerns relating to the 4C's (content, contact, conduct and commerce)..

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful online interaction with other users and students are not allowed to access these sites in school. The harm might range from making, sending or receiving explicit images, hurtful or abusive texts and emails or online bullying, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. This also needs to be considered within the context of unrestricted internet access from students' devices (for example via 4G networks) which are not using the College network.

The school's IT, Internet and E-safety policy explains how we try to keep students safe in school and educate them with regards to the safe use of technology. Cyber-bullying by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures, regardless of whether the school network was used.

The range of online risks could be categorised as:

- content: being exposed to illegal, inappropriate or harmful content; for example pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- contact: being subjected to harmful online interaction with other users; for example peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying commerce: risks such as online gambling, inappropriate advertising, phishing and / or financial scams.
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The COVID pandemic has also highlighted the further considerations that are required regarding E-Safety in the context of remote learning. Whereas, in this context, the College has no oversight or internet filtering capacity due to the students using their own private home connections, the need for E-Safety PSHE, the use of our secure systems for communication of work and video lessons (Office 365, Firefly VLE, Zoom) all remain. The College will also continually review procedures for the management of video lessons to ensure that it is as safe an environment as possible. This is particularly in respect to events such as students who are not members of the College joining a Zoom lesson due to a shared link/log in details.

Staff should refer to paragraph 49 of the Code of Conduct for Staff (Procedure) for guidance on usage of electronic devices. The College's approach to the delivery of effective E-Safety will also be in conjunction with the latest information published in paragraphs 135 - 148 & Annex B of KCSIE.

### **B12 Extended school and off-site arrangements**

Where extended school activities are provided by and managed by the school, our own Safeguarding & Child Protection Policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, the trip organiser, in liaison with the Educational Visits Coordinator (EVC) will check that effective Child Protection arrangements are in place.

### **B13 Boarding: safeguarding statement**

All boarding staff are in a privileged position with regards to identifying signs of abuse and/or neglect, promoting the overall well-being of boarders and taking steps to prevent abuse in all its forms. Bullying is one obvious example and any sort of 'initiation rite' is expressly forbidden.

Particular care is taken by St Edmund's in the recruitment of staff to a post in boarding and those who work with boarders in line with our Safer Recruitment and Selection Policy; the importance of our safeguarding

### ***SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY***

procedures in the context of boarding and how this may differ from the 'day' experience is stressed as part of the induction process of boarding staff. Senior boarding students are briefed as to the outlines of the St Edmund's Safeguarding & Child Protection policy and they are given a leaflet with guidelines to follow if they suspect or spot any form of abuse. Protective behaviours training and boarding specific PSHE on this topic are also provided to all. For further guidance and information on boarding, please refer to the boarding handbooks.

### **B14 Independent Listener(s) for Boarders**

A number of agencies are suggested to boarders if they need to talk to someone from outside the School. These are displayed in boarding corridors near communal telephones and include the School Doctor, the Catholic Children's Society, Childline and the Samaritans. The school's appointed Independent Listener can be contacted on 01920 824316.

## SECTION C: TAKING ACTION

### C1 St Edmund's procedures

Key points to remember for taking action are:

- in an emergency take the action necessary to help the child, for example, call 999
- report your concern to the DSL as soon as possible, immediately if necessary and in call cases, by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern
- seek support for yourself if you are distressed.
- Appendix 4 provides a flowchart for reporting a concern.

If any member of staff is concerned about a child, he or she must inform the DSL, using the "Child Protection Initial Concern Form" which must be completed as soon as possible after the event and, in any case, within 24 hours. The term 'member of staff' includes all adults who work in St Edmund's. The form must contain a clear, precise, factual account of the observations. Forms are available in the Common Room.

### C2 Dealing with a disclosure

It takes courage for a child to disclose that they are being abused, exploited or neglected. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a student talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the student may think that you do not want to listen, if you leave it till the very end of the conversation, the student may feel that you have misled them into revealing more than they would have otherwise.

All staff should reassure victims that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the College should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them. This should be explained in such a way that avoids alarming or distressing them.

All staff should be aware that children may not feel ready or know how to someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build a trusted relationship with children and young people which facilitate communication.

If a student discloses that he or she has been abused in some way, the member of staff should:

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child to talk freely;
- reassure the child but do not make promises which it might not be possible to keep;

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

- do not promise confidentiality – it will be necessary to refer the matter to the DSL and then possibly to people outside St Edmund's;
- reassure him/her that what has happened is not his/her fault;
- stress that it was the right thing to talk about it;
- listen, rather than ask direct questions;
- ask open questions not leading questions;
- do not criticise the perpetrator;
- explain what has to be done next and who has to be told.

Where there is a safeguarding concern, ensure the child's wishes and feelings are taken in to account when determining what action to take and what services to provide.

### **C3 Record keeping**

If a student has disclosed some information which gives rise to concern, the member of staff should:

- make some brief notes as soon as possible after the conversation;
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- draw a diagram to indicate the position of any bruising or other injury;
- record statements and observations, rather than interpretations or assumptions;
- complete the 'Child Protection Initial Concern' form;
- do not destroy the original notes in case they are needed by a court.

Child protection records should be kept confidential, stored securely and handled in line with Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) principles. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights

Records should include:

- A clear and comprehensive summary of the concern;
- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached and the outcome.

Whenever any issue arises that might involve abuse, whether generated by a complaint or by observation within the school, a separate paper and electronic file should be opened and maintained in a secure store/computer file with limited, appropriate access. Every step should be recorded in both paper and electronic form, so that there is no possibility of loss. Any meetings should be minuted contemporaneously by a person not otherwise involved in the meeting. The Governor in charge of Child Protection should audit the files at least annually, to ensure that good record-keeping is followed. It should be borne in mind that such files might be required for the purposes of criminal and civil litigation, so their accuracy and integrity as solid paper trails is paramount.

### **Single Record**

A single record will be implemented giving a full history of child protection matters at the School which will be given to successive Headmasters and Governors. This record will help the School in upholding the highest standards of safeguarding.

### **C4 If you suspect a student is at risk of harm**

There will be occasions when you suspect that a student may be at risk, but you have no 'real' evidence. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or you may have noticed physical but inconclusive signs. In these circumstances, you should try to give the student the opportunity to talk. The signs you have noticed may

## **SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**

be due to a variety of factors, for example, a pet has died, a grandparent is very ill, a parent has moved out. It is fine to ask the student if they are OK or if you can help in any way.

There is a 'Cause for Concern' file for staff to note these concerns which do not merit referral but, added up, may give a worrying picture. This file is securely stored by the Headmaster and DSLs (and Deputy DSLs). An oblique mention will be placed on the child's file. Use the 'Child Protection Initial Concern form' (see appendix 5) to record these early concerns. If the student does begin to reveal that they are being harmed you should follow the advice in the section 'If a student discloses to you'.

If, following your conversation, you remain concerned, you should discuss your concerns with the Designated Safeguarding Lead, although any staff member can make a referral to children's social care. If you do make a referral, you should inform the Designated Safeguarding Lead as soon as possible. The local authority will follow its own procedures and should make a decision within one working day and let the referrer know the outcome. Should such information not be forthcoming, you should follow this up, possibly through the Designated Safeguarding Lead.

**If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately.** Anyone can make a referral and parental consent in this instance is not required. Where referrals are not made by the designated safeguarding lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made. The telephone number can be found on page 2 of this Policy.

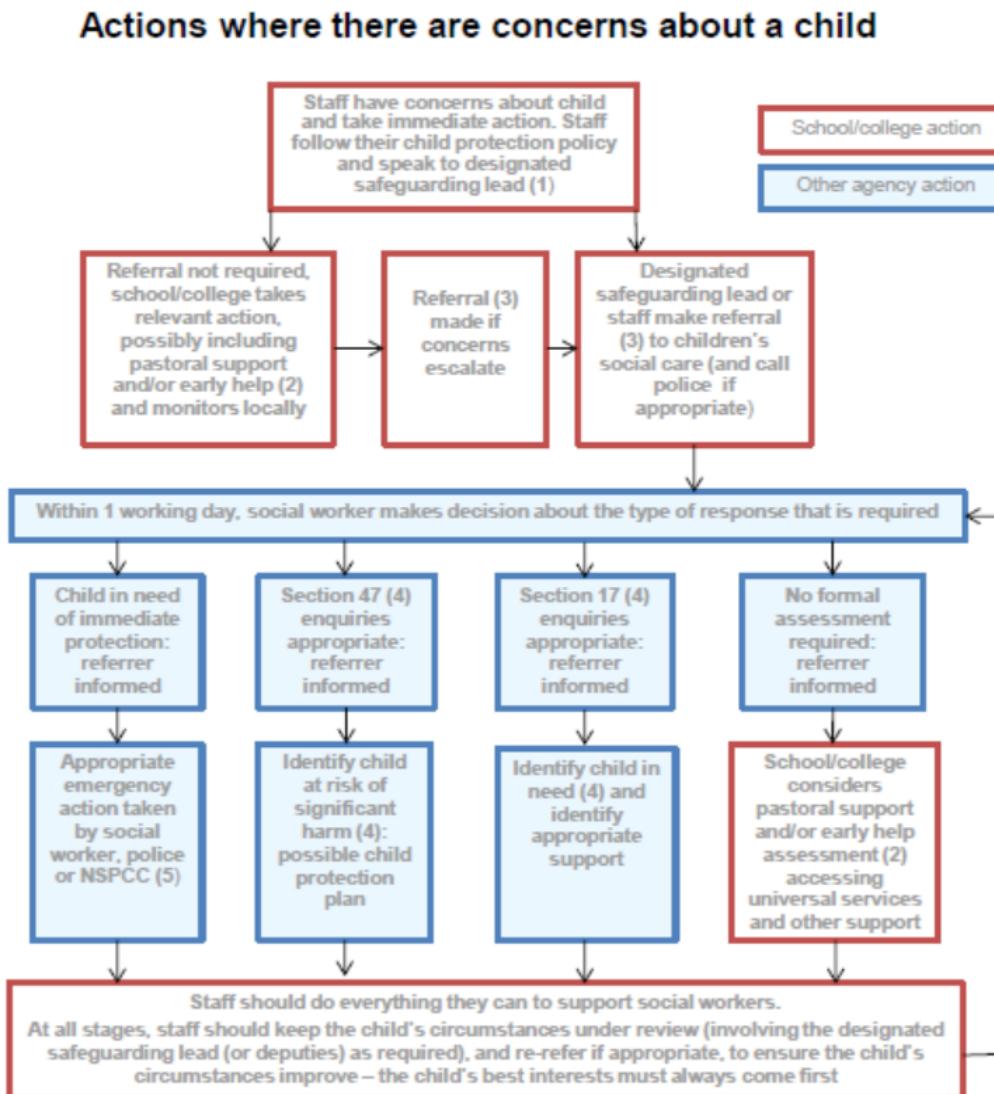
All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the designated safeguarding lead.

If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re- consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

The flow charts that follow illustrate the process for safeguarding and promoting the welfare of children from the point that concerns are raised about a child:

Actions where there are concerns about a child – from Keeping Children Safe in Education



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

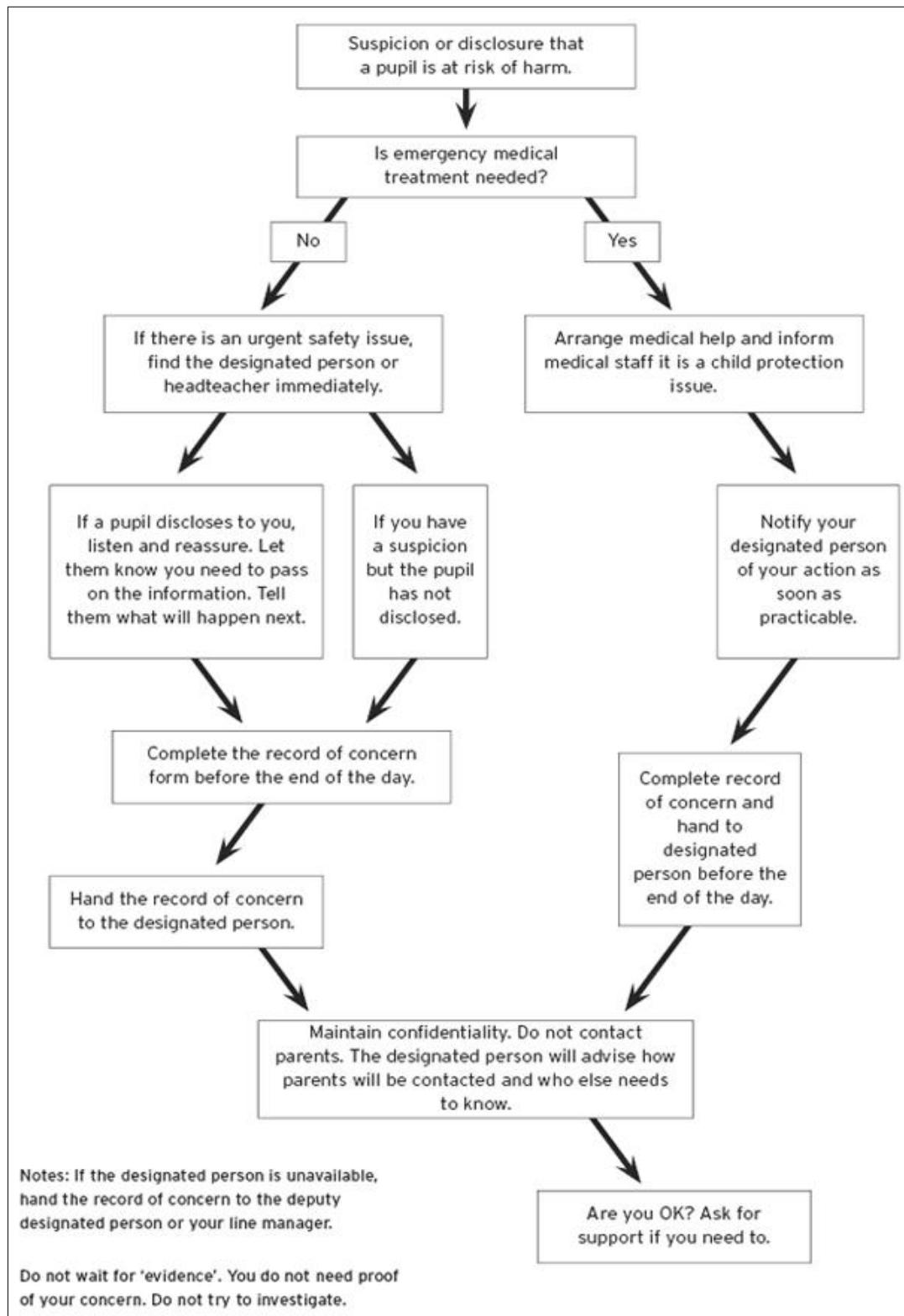
(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

**Reporting a concern flowchart – School internal procedures**



## C5 What to do if a student is missing, including EYFS

If a student has not arrived for AM registration, and the school is not aware of a valid reason for absence, parents will be contacted by the school office.

If a student is reported missing, the following procedures will be observed:

- check register;
- if during the school day, alert HSM and/or HOY, DHP and DSL/DDSL
- if out of hours/boarding, alert HSM, HOB and duty SLT member;
- speak to friends, tutor, HSM for any information that might be relevant;
- search school premises (consider other areas of the school that may require students to miss a timetabled lesson e.g. Health Centre or a peripatetic music lesson);
- check CCTV.

If, after following the above procedures, a student cannot be traced within an hour of his or her being reported missing, parents or guardians should be contacted; if they cannot be contacted then it should be referred to the police by the DSL or his/her Deputy and in their absence, by the Headmaster. Even if the parents are contactable, the police should be always be contacted if the child has not returned, or their whereabouts are unknown.

The same procedures should be followed in the case of an EYFS student, but parents should be contacted immediately. The DSL, DDSLs and the Head reserve the right to do so in any case, irrespective of student age, if they feel they have reasonable grounds for immediate concern (this could be based on the school's knowledge of the student in question or perhaps connected to weather conditions etc.). These rules apply, as does the whole policy, to school off-site provision.

Any concerns about estranged parents or parents in dispute over custody where one party is resident abroad should be raised with the DSL; in the case of an abduction or kidnap the School will work with the police and relevant authorities to ensure the safe and prompt return of the child and the protection of all concerned.

If it transpires that the child has decided to "run away", then the matter will be fully investigated and the DSL will assess the situation. It may be necessary to liaise with the CPSLO, and particularly for repeated occasions, as a child going missing can be an indicator of abuse and neglect, including sexual abuse or exploitation. It is important to monitor and help prevent the risk of their going missing again in the future.

## C6 Reporting directly to Child Protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, the police or the NSPCC.

Guidelines for when this may be appropriate are:

- the situation is an emergency and the Designated Safeguarding Lead, their deputy, the Headmaster and the Chair of Governors are all unavailable
- they are convinced that a direct report is the only way to ensure the student's safety.

### **C7 Allegations against students**

Children are capable of abusing their peers. The School procedures regarding referrals will be followed in cases of child on child abuse.

A student against whom an allegation of abuse has been made may be suspended from the School and the School's policy on behaviour, discipline and sanctions will apply. The School will take advice from the Local Authority Designated Officer (LADO) and/or the Child Protection Schools Liaison Officer (CPSLO) on such allegations and will take all appropriate action to ensure the safety and welfare of all students involved, including the student or students accused of abuse. If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LADO/CPSLO, parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult. In the case of students whose parents are abroad, the student's Education Guardian will be requested to provide support to the student and to accommodate him/her if it is necessary to suspend him/her.

### **C8 Harm from outside the School**

Suspected harm from outside the School

A member of staff who suspects that a student is suffering harm from outside the School should seek information from the child with tact and sympathy using "open" and not leading questions. A sufficient record should be made of the conversation and he or she should refer the matter to the Designated Safeguarding Lead.

### **C9 Former Students**

The Governors will ensure that nothing will be allowed to take precedence over concerns for the current physical and emotional health of former students.

## **C10 Safeguarding concerns and allegations involving St Edmund's College and St Edmund's Prep School Staff, including volunteers, supply staff and contractors.**

It is essential in all cases of suspected abuse by a member of staff that action is taken quickly and professionally in the interest and welfare of the child. All allegations will be recorded and dealt with promptly and appropriately. Allegations will be addressed in accordance with part 4 of Keeping Children Safe in Education. This part of the guidance has two sections covering the two levels of allegations/concerns:

1. Allegations that may meet the harms threshold
2. Allegations/concerns that do not meet the harms threshold – referred to as ‘low level concerns’

It relates to members of staff who are currently working in the College or Prep (including volunteers, supply staff and contractors) regardless of whether or not the alleged abuse took place at the College or Prep. If the allegation is regarding supply staff, the School will take the lead but keep the supply agency fully informed and involved. This is also the case for contractors where we will keep their employer informed. This enables any potential patterns of inappropriate behaviour to be identified.

If staff members have concerns about another staff member then this should be referred to the Headmaster. Where there are concerns about the Headmaster, this should be referred to the Chair of Governors. Where an allegation is against the Headmaster, the Headmaster must not be informed of the allegation prior to contact with the Chair or LADO. Where there are concerns about the Chair of Governors, this should be referred to the police or directly to the LADO. If there is a conflict of interest when reporting the matter to the Headmaster, this should be reported directly to the LADO. Full details can be found in Part 4 of Keeping Children Safe in Education.

Allegations against a teacher who is no longer teaching should be referred to the police.

Allegations that may meet the harms threshold:

This procedure will be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers, supply staff and contractors) in the College or Prep that provides education for children under 18 years of age 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 would pose a risk of harm if they work regularly or closely with children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children,

The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk.

Actions to be taken:

1. **The Headmaster will immediately discuss the allegation with the LADO** to consider the nature, content and context of the allegation and agree a course of action. The LADO has overall responsibility for oversight of the procedures for dealing with allegations; for resolving any inter-agency issues; and for liaison with the Hertfordshire Safeguarding Children Partnership (HSCP) on the subject.
2. **A case manager will be appointed**, in agreement with the LADO. If the LADO is unavailable, he will decide whether it is necessary to contact the police immediately. The LADO will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases.

3. **The possible risk of harm to children will be evaluated**, medical attention will be sought where necessary and appropriate support as required.
4. **Decision taken about the seriousness of the allegation.**  
Discussion of possible outcomes:
  - a. No Further Action:
    - i. Decision and justification to be recorded by the case manager and LADO
    - ii. Agreement on what information should be put in writing to the individual concerned and by whom.
    - iii. Decision as to action in respect of whoever made the initial allegation.
  - b. Police Involvement: In cases where a crime may have been committed. The School will co-operate with any police investigation, as necessary. The police will inform The School and LADO immediately when a criminal investigation is complete.
  - c. Children's Social Care Involvement: When a child is in need of protection or services.
  - d. Strategy Discussion in accordance with Working Together to Safeguard Children: This will be necessary in cases where there is cause to suspect that a child is suffering or likely to suffer significant harm.
  - e. Further Enquiries: In this case the LADO will decide with the case manager how and by whom the investigation will take place, either by a senior member of staff or in complex cases by an external investigator.
5. Depending upon the outcomes of investigations and actions above, **the LADO will discuss the next steps with the case manager**. Information will be shared with relevant agencies, as appropriate and in consultation with the LADO.
6. **The Headmaster and case manager will decide whether the individual is to be suspended**, taking into consideration the guidance in paragraphs 359-376 of the Government Guidance *Keeping Children Safe in Education*.
7. **The case manager will inform the individual of concerns or allegations as soon as possible**, taking into account any restrictions imposed, as above. An explanation will be given of the likely course of action. The individual will be advised to contact their trade union and a named representative will be appointed to keep the person who is the subject of the allegation informed of the progress of the case. Consideration will be given as any other appropriate support which may be necessary.
8. **If the individual is suspended**, they will be kept informed of both their case and current work-related issues.
9. **As soon as possible after appropriate agencies have been consulted, the parents or carers of any child involved will be informed about the allegation**. They will be kept informed of the progress of the case and told the outcome, where there is not a criminal prosecution. They will be told, in confidence, the outcome, but not the deliberations, of a disciplinary hearing.
10. **Parents and carers will also be made aware of the prohibition on reporting or publishing allegations** about teachers in section 141F of the Education Act 2002 (see below). If parents or carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.
11. **The School will maintain confidentiality**, with regard to paragraphs 390-399 of the Government Guidance Keeping Children Safe in Education. In particular, the case manager should take advice from the LADO, police and children's social care services to agree the following:
  - a. who needs to know and, importantly, exactly what information can be shared;
  - b. how to manage speculation, leaks and gossip;
  - c. what, if any information can be reasonably given to the wider community to reduce speculation; and
  - d. how to manage press interest if and when it should arise.

12. **Cases will be resolved as quickly as possible and in line with school's disciplinary policy**  
St Edmund's College & Prep disciplinary policy is available upon request from the HR department.
13. **Records will be kept:** A clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on the confidential personnel file of the accused, and a copy provided to the person concerned, where agreed by children's social care or the police and a declaration on whether the information will be referred to in any future reference. In the case of malicious allegations, such records will be removed from personnel records.

## Conclusion

**Every effort will be made to reach a conclusion**, including any in which the person concerned refuses to co-operate.

**Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate that.** Help and support to return to work will be offered, as this will have been a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a student at the College or Prep.

**A referral to the DBS must be made in the case of anyone (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is they have caused harm or posed a risk of harm to a child**

**or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended. Referrals should be made as soon as possible after the resignation, removal or redeployment of the individual.**

The following definitions will be used when determining the outcome 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;
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

## Malicious Allegation

1. **The LADO will refer the matter to Children's social care services** to determine whether the child is in need of any services.
2. **The Headmaster will consider whether any disciplinary action is appropriate** against the student or whether the police should be asked to consider if action might be appropriate against the person responsible.

## Unsubstantiated Allegation

1. **The LADO will refer the matter to Children's social care services** to determine whether the child is in need of any services.

## Substantiated Allegation

1. **If the person is dismissed or the School ceases to use the person's services**, or the person resigns or otherwise ceases to provide his or her services, the LADO will discuss with the Headmaster or case manager and the HR Director whether the School will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and in the case of a member of teaching staff whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching. Where the LADO advises referral to DBS, it constitutes an offence if the School does not do so.
2. **A settlement/compromise agreement will not be used** in cases where the person resigns or services cease to be used and the criteria for referral to DBS are met. Nor will they be used in cases of no co-operation or when the person resigns before their notice period expires.

3. **The LADO will review the circumstances of the case with the case manager** to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

#### Non recent allegations

Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

#### Concerns/allegations that do not meet the harm threshold (Low Level Concerns):

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including appropriate conduct outside of work;
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO
- Examples of such behaviour could include, but are not limited to:
  - Being over friendly with children;
  - Having favourites;
  - Taking photographs of children on their mobile phone;
  - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
  - Using inappropriate sexualized, intimidating or offensive language
  - Humiliating pupils

Upon receiving an allegation that about a member of staff that the Headmaster deems to be low-level, he may delegate the investigation to the DSL or DDSL as appropriate.

If the School is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the School will consult with the LADO.

#### Actions to be taken:

All low level concerns should be recorded in writing. The record should include:

- Details of the concern,
- Context in which the concern arose
- Action taken

Name of individual sharing their concerns, however, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible

These records will be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of behaviour is identified, the school should decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate, policies could be revised or extra training delivered to minimise the risk of it happening again.

If the concern has been raised via a third party, the designated safeguarding lead should collect as much evidence as possible by:

- Speaking directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witness

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. All of this information need to be recorded, along with the rationale for their decisions and action taken.

Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Organisations or Individuals using school premises:

The College may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children. As with any safeguarding allegation, the College will follow appropriate safeguarding policies and procedures, including informing the LADO.

## **C11 Support for staff**

Dealing with a disclosure from a student, and being involved in a Child Protection case in general is likely to be a stressful experience. The member of staff concerned should therefore consider seeking support and possibly discuss this with the Deputy Head (Pastoral).

## **C12 EYFS**

### **Failure to collect a student**

*Failure to collect a student* - the care of your child is paramount. However, if a student is "not collected" the following steps will be taken:

- If a part-time Nursery student is not collected at 11.30 am then the student will be taken for lunch and remain with the other students. The teacher or office staff will phone the parents. If no contact has been made after an hour, then the emergency contact will be used. A member of St Edmund's Prep SMT should also be informed
- If a student is not collected at 3.30 or 4.30 pm then the student will be placed in our Tea Timer Club and these staff will phone parents and then the emergency contact number. A member of St Edmund's Prep SMT should also be informed.

### **EYFS Nutrition Guidance**

EYFS staff work closely with catering staff with regard to the following nutrition guidance:

[https://assets.publishing.service.gov.uk/media/67f8e61c04146682e61bc84c/Nutrition\\_guidance\\_for\\_early\\_years\\_providers.pdf](https://assets.publishing.service.gov.uk/media/67f8e61c04146682e61bc84c/Nutrition_guidance_for_early_years_providers.pdf)

<https://help-for-early-years-providers.education.gov.uk/health-and-wellbeing/food-safety>

Whilst children are eating, there is a member of staff with paediatric first aid training present. We use a lanyard system to identify children with food allergies and intolerances. Children are always within sight and hearing of a member of staff whilst eating. Any incidents of choking are recorded in the EYFS accident book.

### **EYFS Toileting and Privacy**

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

Children's privacy is considered and balanced with safeguarding and support needs when assisting children with intimate care and toileting. There is an adequate supply of spare clothes and other necessary items.

### **Staff Mobile Phones, cameras and any electronic devices with imaging and sharing capabilities.**

Members of staff are not permitted to use their personal mobile phones, cameras or any other electronic devices with imaging and sharing capabilities, to take photographs of students, either in the school or on outings or trips. School mobile phones and EYFS tablets may be used for this purpose. (See Photography section below).

### **Photography**

Photographs taken of students at school are taken for valid reasons: for the recording of curriculum activities in action, recording of the learning and development of students for observation records and profiles. We also use photographs for displays within the setting.

The permission of parents and carers to use images of student in promotional material is sought by the Marketing Manager as specified in point 6.15 of the Parent Contract.

St Edmund's Prep EYFS use the secure, on-line Tapestry software to store observations. Parents are asked to sign a user agreement to agree not to share or upload these images to social media and to give their permission for images of their child to appear in observations of other children.

Parents are reminded that photographing or recording of their own children at special events should not include other children, unless permission is sought from those parents.

Images are stored on-site in the shared drive for staff access only. No external access is available. Staff are discouraged from taking documents including photographs off-site.

On occasion, images of student may appear in promotional material, for example on the school website, in College Life or in the weekly Prep newsletter. If parents do not wish images of their child to appear in promotional material, they must write to the Marketing Manager requesting an acknowledgement of their letter.

### **C13 Complaints Procedure**

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for Child Protection action. Poor practice examples include unfairly singling out a student, using sarcasm or humiliation as a form of control, bullying or belittling a student or discriminating against them in some way. Complaints are managed by senior staff, the Headmaster and Governors. Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

Owner of policy:	Deputy Head Pastoral		
Reviewed by:	Deputy Head Pastoral	Assistant Head Safeguarding & Wellbeing	
Frequency of review:	Annually		
Policy last reviewed:	Michaelmas	2025	
Next review date:	Michaelmas	2026	
Sub-Committee reviewed at:	Academic Sub-Committee		

## **Safeguarding & Child Protection Appendices**

### **Appendix 1: Staff Code of Conduct**

The College Code of Conduct can be found in the staff handbook, located on Teams (SEC\_general\_Files\_Handbooks\_Staff Handbook).

#### **Safeguarding Adults**

Good Practice Guidelines (Please also refer to sections B1 and B2 in the main body of the policy)

All St Edmund's College and Prep, Staff should ensure that:

- They have read and understand the College Child Protection policy and procedures, including restraint.
- They have read and understand the most recent edition of Part One of the Government Guidance Keeping Children Safe in Education.
- Exercise caution in any physical contact with children.
- Behave in a professional manner towards children and staff.
- Be responsible for their behaviour
- Avoid conduct which would raise concern
- Work in an open and transparent way
- Exercise caution in one to one settings
- Discuss concerns / take advice from a senior member of staff
- Apply professional standards in a non-discriminatory manner
- Pupils' privacy is respected, especially for boarders.
- Follow guidance

St Edmund's College and Prep Staff should not:

- Show favouritism to a pupil or group of pupils.
- Use force to deal with challenging behaviour, except in cases where restraint is necessary and then only in accordance with the restraint policy.
- Promise to keep secrets or ask pupils to keep secrets.
- Discuss personal matters with pupils or give out personal details.
- Discuss inappropriate matters with pupils.
- Gossip with or concerning either pupils or staff.
- Participate in or tolerate inappropriate physical activities, including any sexually provocative behaviour
- Make suggestive or discriminatory remarks.
- Convey pupils by car, except in emergency situations, and if possible, with the permission of SLT
- Use social networking sites to contact or be contacted by pupils.
- Store pupils' phone numbers in personal mobile phones.
- Text pupils, other than in necessary circumstances, for example on a school trip.

**Safeguarding & Child Protection Appendices**

**Appendix 2: Visiting Staff Child Protection Information Leaflet**

WELCOME to St Edmund's College and St Edmund's Prep School.

*Rooted in Christ and Catholic tradition and under the guidance of its patron, St Edmund's aims to realise the God-given potential, in body, mind and spirit, of all members of its community through service and leadership.*

*Avita Pro Fide!*

*St Edmund's is committed to ensuring the welfare and protection of children in their care and this commitment is a fundamental part of the role of every employee.*

The Governors and staff believe that the very highest priority must be given at all times to our moral and statutory duty to safeguard and promote the welfare and safety of our students. In line with our mission statement we aim to be a community with an ethos in which students feel secure, valued and listened to, and in which their views are taken seriously and responded to appropriately. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. While working in our school we expect you to take care of our students and follow our procedures.

**Key facts about child abuse**

Abuse and neglect can happen to any child, boy or girl, of any race, culture, ethnicity or sexuality. Disabled children and children with SEN are particularly vulnerable. Many children are unable to disclose what is happening to them and rely on us to interpret their behaviour and spot signs of abuse.

A student may:

- have a bruise, burn or injury that seems suspicious show signs of pain or discomfort
- be unnaturally passive or withdrawn
- be unpredictable and challenging
- seem anxious, fearful or distressed

- provide an unlikely explanation for their injury or their behaviour.

If you are concerned for a child's health, welfare or safety in any way you must speak to the Designated Safeguarding Lead (DSL) Mrs Lucy Dunhill (or in her absence the Deputy DSLs, Mr Liam Woodward or Miss Marie-Christine Simon) or a senior member of staff before you leave the school site. At St Edmund's Prep School, the DSL for the Prep School & EYFS is Mrs Vicky Penfold and the Deputy DSL is Mr Steven Cartwright.

Do not question the student or try to secure evidence. Your responsibility is to report your concern, not to investigate.

If a student tells you something that suggests they are at risk of harm, allow them to tell you as much as they wish and let them know that you must pass the information on to the DSL.

If you become concerned about a student's immediate safety, notify the nearest member of staff and tell them why you are concerned.

You should complete a welfare concern form and hand it to the DSL or a senior member of staff before you leave the school site. Ask a senior member of staff if you would like help to complete the form. If you have any questions or wish to see our Safeguarding & Child Protection Policy contact the DSL.



**Safeguarding & Child Protection Appendices**  
**Appendix 3**

**CONFIRMATION OF RECEIPT OF SAFEGUARDING &  
CHILD PROTECTION POLICY**

Name: \_\_\_\_\_

Date of joining school: \_\_\_\_\_

Post: \_\_\_\_\_

Date of induction: \_\_\_\_\_

Name and post holder of staff member  
responsible for induction: \_\_\_\_\_

I confirm that I have received and read the St Edmund's Safeguarding & Child Protection Policy and in particular I have read and understood the Staff Code of Conduct at Appendix 1 of this Policy.

I have been made aware of my duty to safeguard and promote children's welfare.

The procedure for reporting concerns about a pupil has been explained to me.

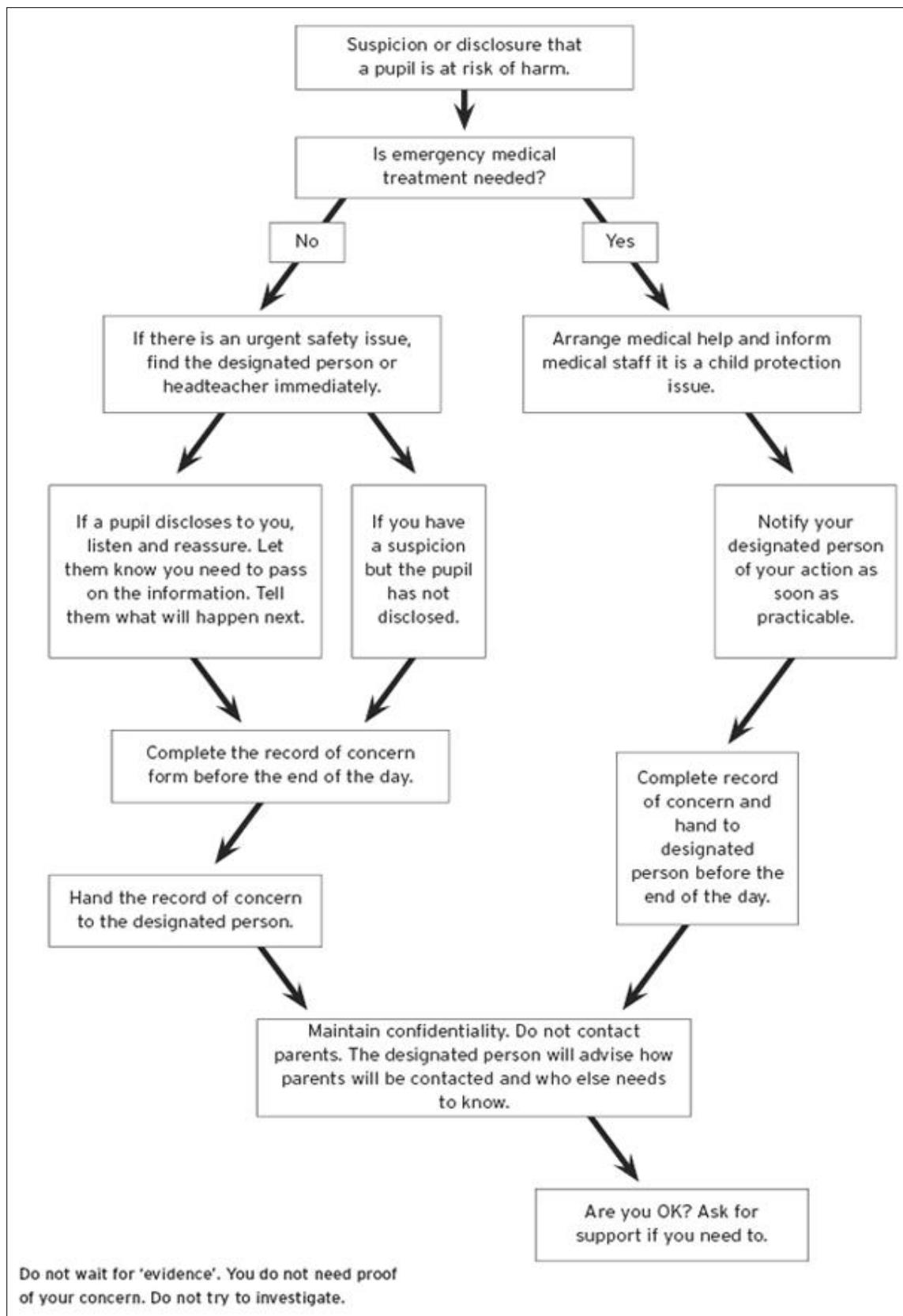
Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Please sign and return this form  
to the Designated Safeguarding Lead: \_\_\_\_\_

**Safeguarding & Child Protection Appendices**  
**Appendix 4 Reporting a Concern Flowchart**





**Safeguarding & Child Protection Appendices**  
**Appendix 5**

**Child Protection Initial Concern Form**

If you are approached by a child or a parent and are concerned that it may be a Child Protection issue, please fill in this form as soon as possible and pass it immediately to the DSL or DDSL. Record statements and observations rather than interpretations or assumptions. This form can also be used for staff to report their own concerns about a child. If you have made notes beforehand or separately please attach these also.

See overleaf for "Reporting a concern flowchart".

The form should then be passed to the Designated Safeguarding Lead for Child Protection:-  
Mrs L Dunhill (St Edmund's College) or Mrs V Penfold (St Edmund's Prep School)

Member of Staff:	Date:
Student name & Form:	Place:
Source: Parent / 'phone call / student report / staff report	
Statements & Observations:	
Non-verbal behaviour during initial conversation noted, if appropriate:	
Any other concerns? <i>(Known background information that might help)</i>	
Date Form Received by Child Protection Officer: Action Taken by Child Protection Officer:	

*Safeguarding & Child Protection Appendices*

**Appendix 6: Possible Indicators of Abuse**

**Possible Signs of Physical Abuse**

Unexplained injuries or burns, particularly if they are recurrent  
Injuries not typical of accidental injury  
Frequent injuries even with apparently reasonable explanations  
Improbable or conflicting explanations for injuries  
Refusal to discuss injuries  
Admission of punishment which appears excessive  
Fear of parents being contacted  
Bald patches  
Withdrawal from physical contact  
Arms and legs kept covered in hot weather  
Fear of returning home  
Fear of medical help / parents not seeking medical help  
Self-destructive tendencies  
Aggression towards others  
Chronic running away  
Frequently absent from school

**Possible Signs of Emotional Abuse**

Probably the most difficult type of abuse to recognise. An emotionally abused child is often withdrawn, introverted and depressed  
Admission of punishment which appears excessive  
Over-reaction to mistakes  
Sudden speech disorders  
Fear of new situations  
Inappropriate emotional responses to painful situations  
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)  
Self-mutilation  
Fear of parents being contacted  
Extremes of passivity or aggression  
Drug/solvent abuse  
Chronic running away  
Compulsive stealing  
Scavenging for food or clothes  
Continual self-depreciation  
Air of detachment – ‘don’t care’ attitude  
Social isolation – does not join in and has few friends  
Desperate attention-seeking behaviour  
Eating problems, including over-eating or lack of appetite  
Depression, withdrawal

### **Possible Signs of Sexual Abuse**

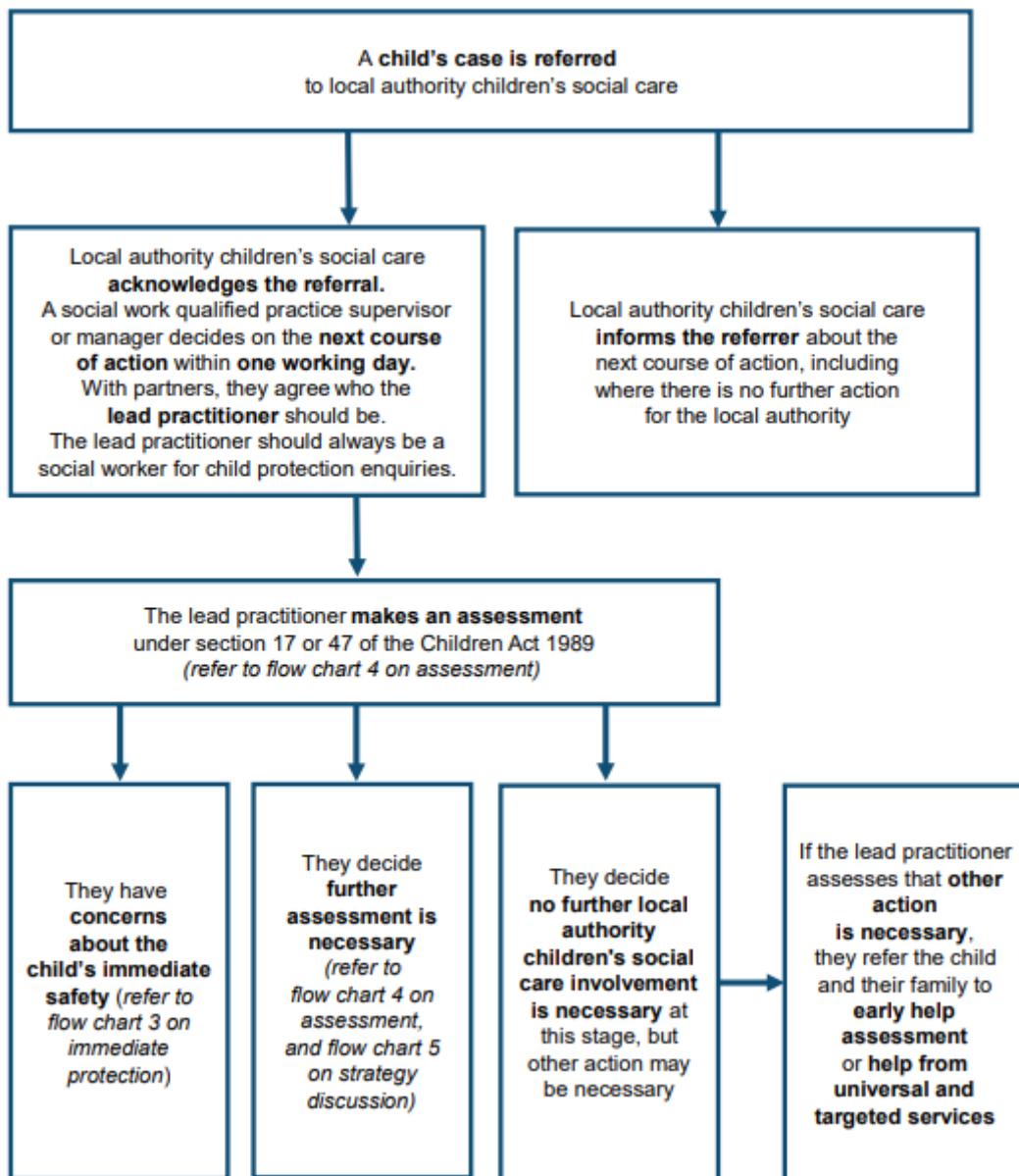
Demonstrate sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit  
Wetting or other regressive behaviours e.g. thumb sucking  
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn  
Stop enjoying previously liked activities  
Be reluctant to undress for PE  
Become fearful of, or refuse to see, certain adults for no apparent reason; show dislike of a particular baby-sitter, relative or other adult  
Draw sexually explicit pictures  
Urinary infections, bleeding or soreness in the genital or anal areas  
Soreness or bleeding in the throat  
Chronic ailments, such as stomach pains or headaches  
Take over the parental role at home; seem old beyond their years  
Develop eating disorders, such as anorexia or bulimia  
Depression, suicidal thoughts  
Poor self-image, self-harm, self-hatred  
Physical discomfort  
Use drugs or drink to excess  
Unexplained pregnancy  
Memory loss  
Frequent running away  
Restricted social activities  
Find excuses not to go home or to a particular place  
Have recurring nightmares/be afraid of the dark  
Be unable to concentrate; seem to be in a world of their own  
Have a 'friend who has a problem' and then tell about the abuse of the friend  
Sudden changes in school work habits, become truant  
Withdrawal, isolation or excessive worrying  
Outbursts of anger or irritability  
Unexplained sums of money  
Act in a sexually inappropriate/harmful or seductive way towards others

### **Possible Signs of Neglect**

Constant hunger  
Poor personal hygiene  
Inappropriate clothing, clothing in a poor state of repair  
Frequent lateness or non-attendance at school  
Untreated medical problems  
Low self-esteem  
Poor social relationships  
Compulsive stealing  
Constant tiredness  
Emaciation  
Destructive tendencies  
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)  
Chronic running away  
Scavenging for food or clothes

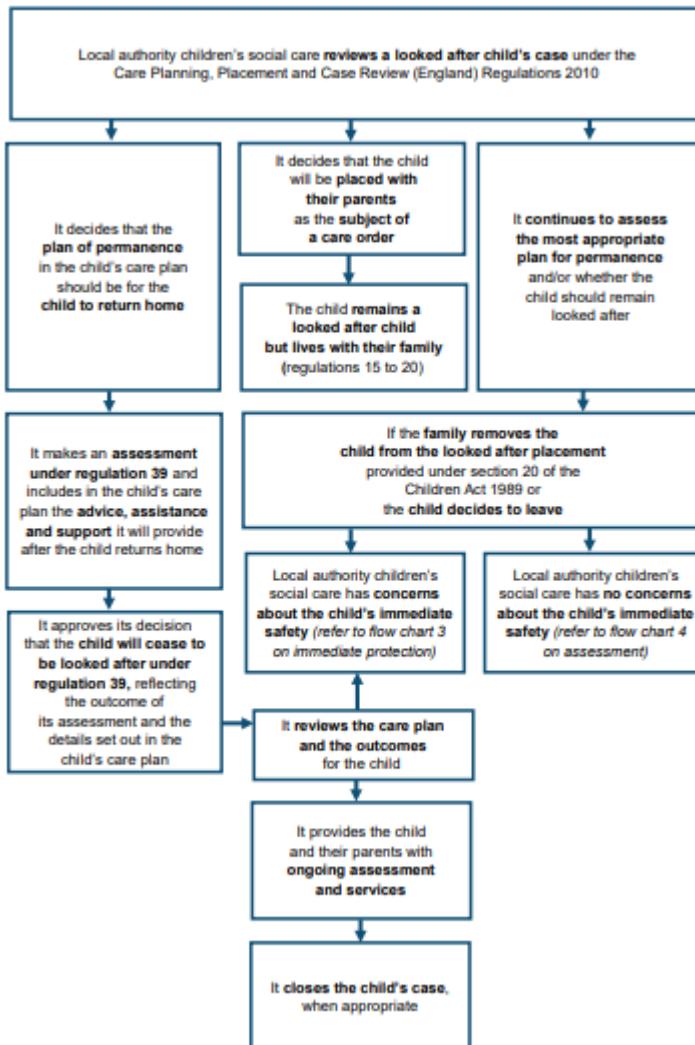
**Safeguarding & Child Protection Appendices**

**Appendix 7: Flow Chart 1: Action taken when a child is referred to local authority children's social care services (Working Together to Safeguard Children, December 2023)**



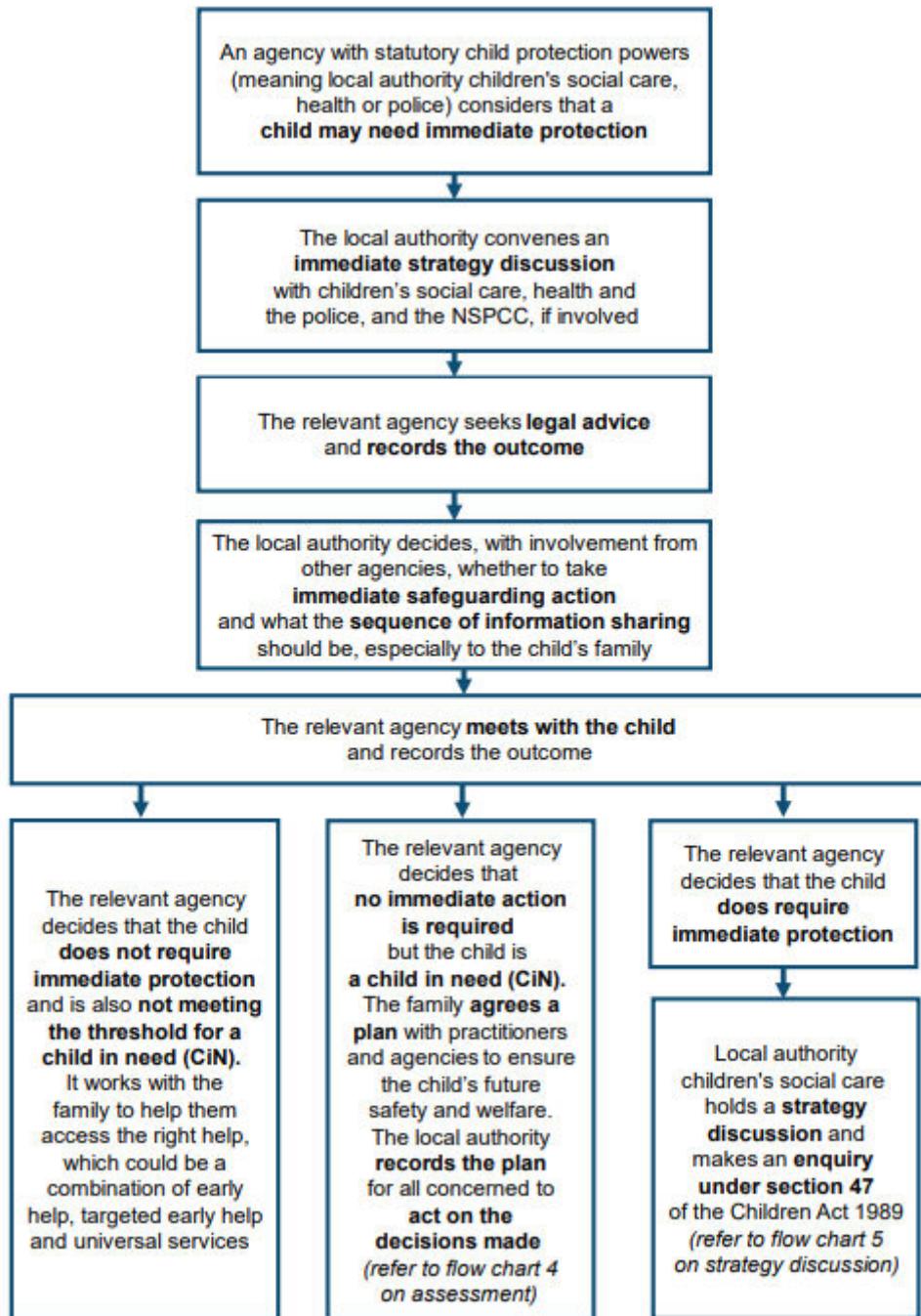
**Safeguarding & Child Protection Appendices**

**Appendix 8: Flow Chart 2: Looked after children returning home to their families (Working Together to Safeguard Children, December 2023)**



**Safeguarding & Child Protection Appendices**

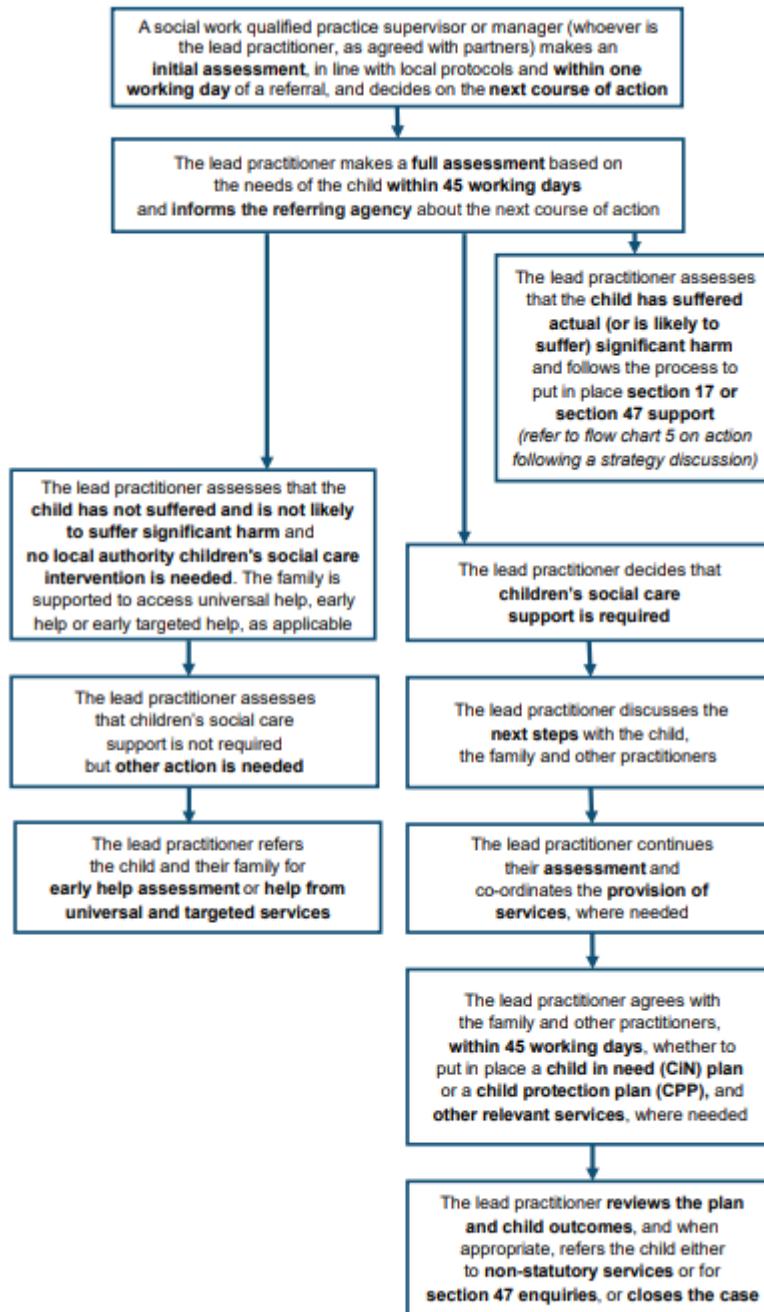
**Appendix 9: Flow Chart 3:Immediate Protection (Working Together to Safeguard Children, December 2023)**



**Safeguarding & Child Protection Appendices**

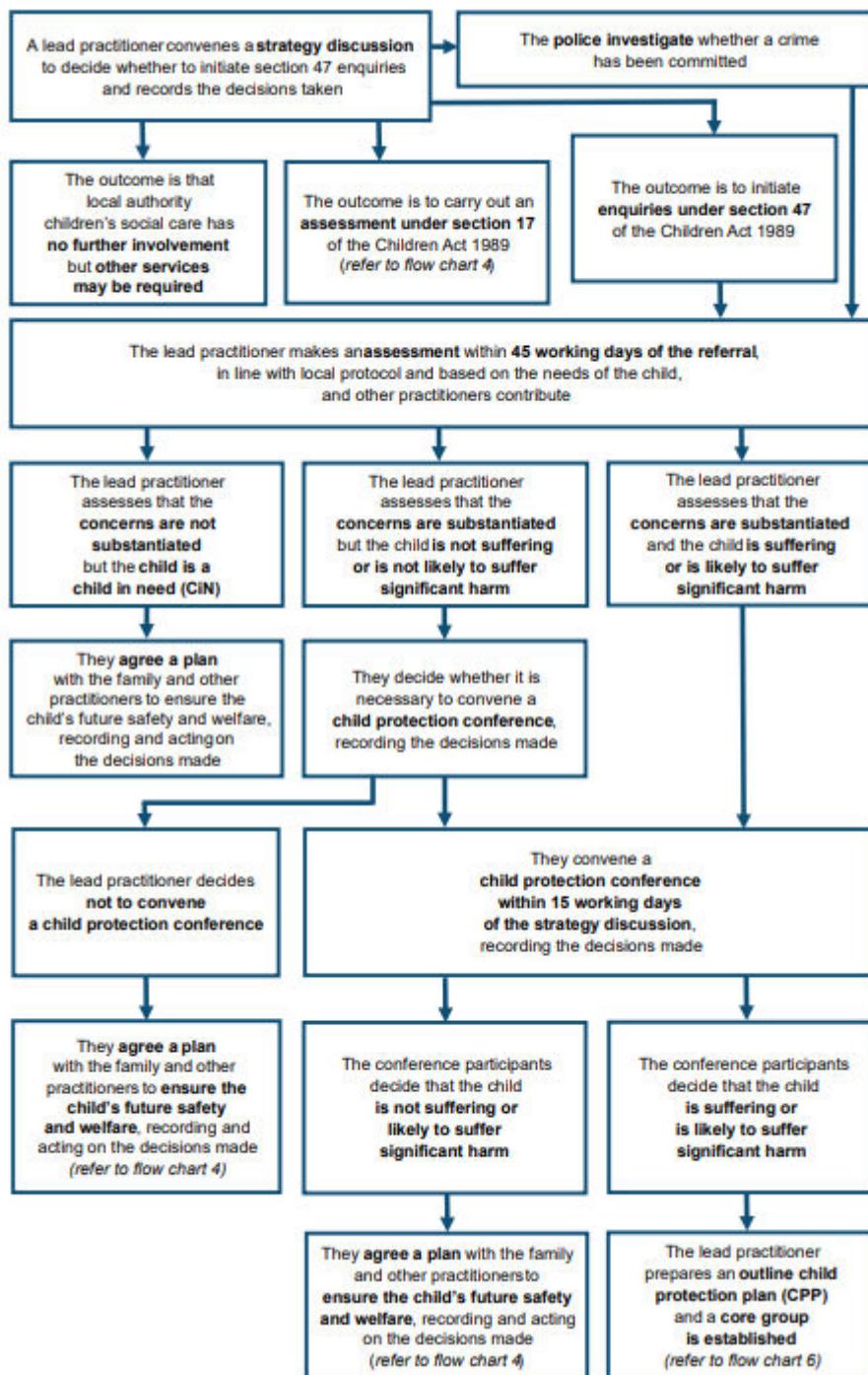
**Appendix 10: Flow Chart 4: Action taken for an assessment of a child under the Children Act 1989**

*(Working Together to Safeguard Children, December 2023)*



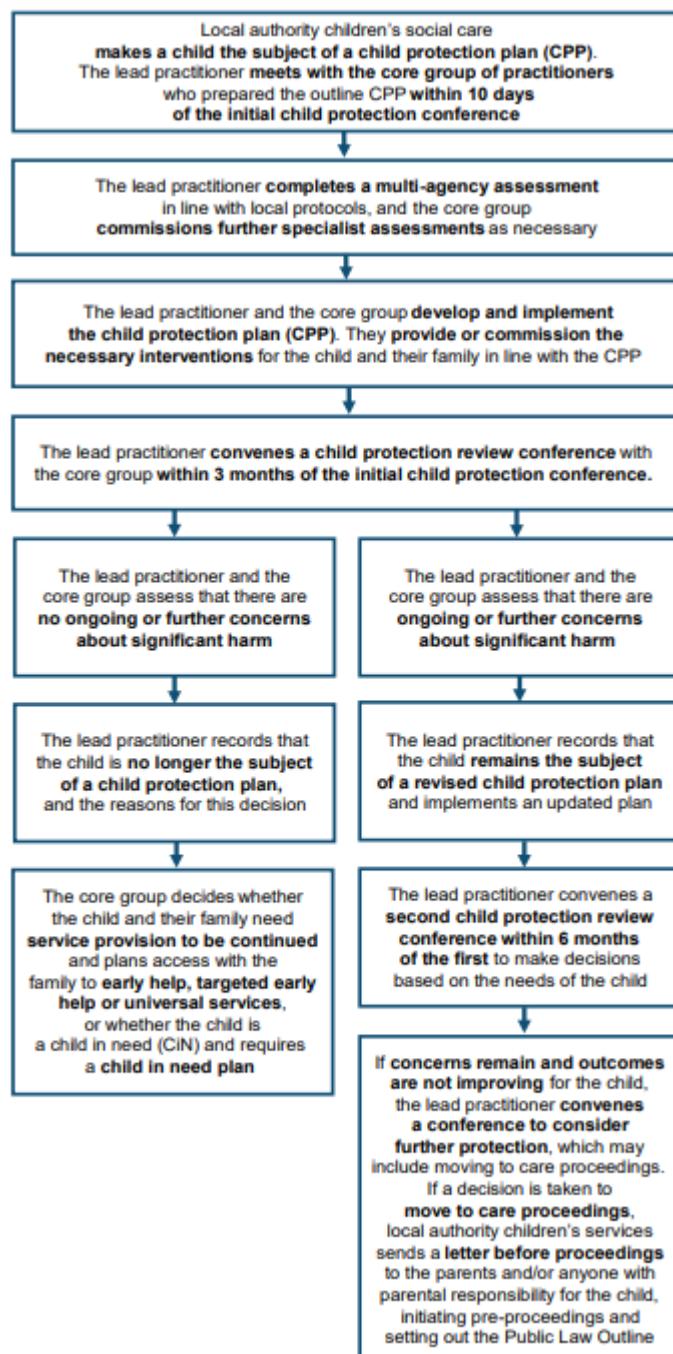
**Safeguarding & Child Protection Appendices**

**Appendix 11: Flow Chart 5: Action following a strategy discussion (Working Together to Safeguard Children, December 2023)**



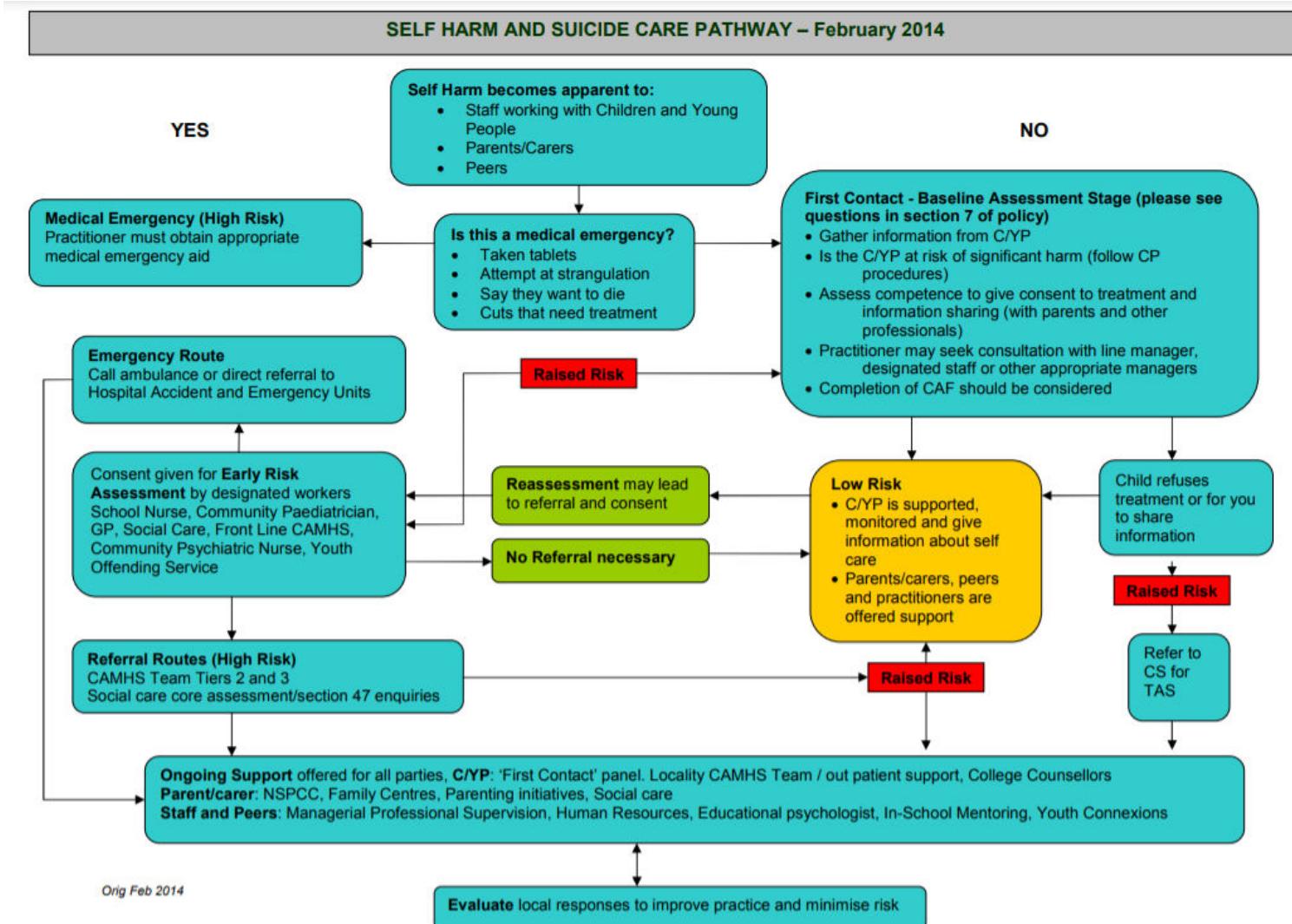
**Safeguarding & Child Protection Appendices**

**Appendix 12: Flow Chart 6: What happens after the child protection conference, including the review? (Working Together to Safeguard Children, December 2023)**



*Safeguarding & Child Protection Appendices*

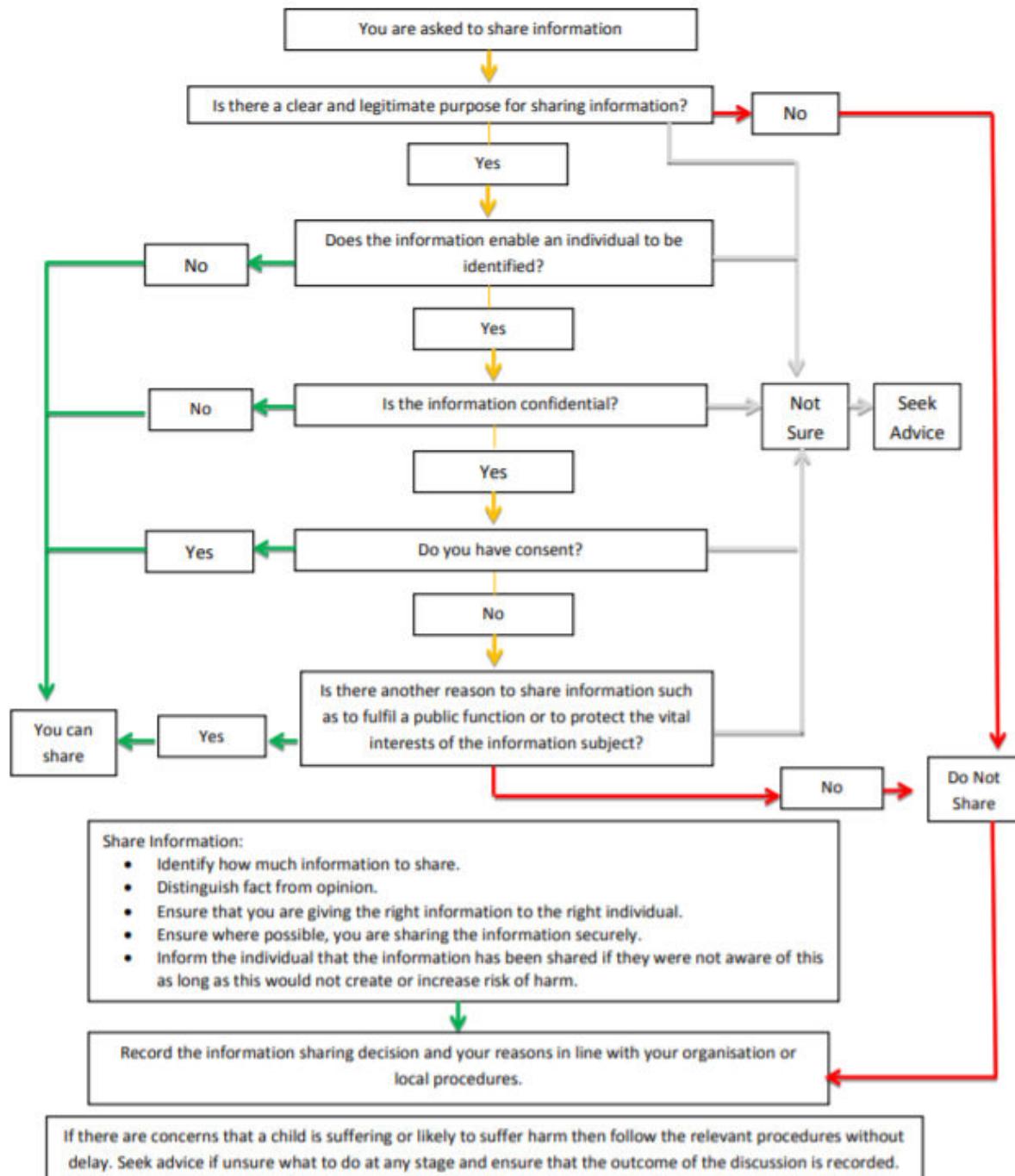
Appendix 13-Self Harm CarePathway Feb 2014 (*Self Harm and Suicidal Behaviour: A Guide for Staff working with Children and Young People in Hertfordshire*



**Safeguarding & Child Protection Appendices**

**Appendix 14 – Flowchart for key principles for information sharing (Hertfordshire Safeguarding Children Board)**

**Section 5: Flowchart – When and How to Share Information**



## Appendix 15 – M.A.S.H (Multi Agency Safeguarding Hub) Leaflet

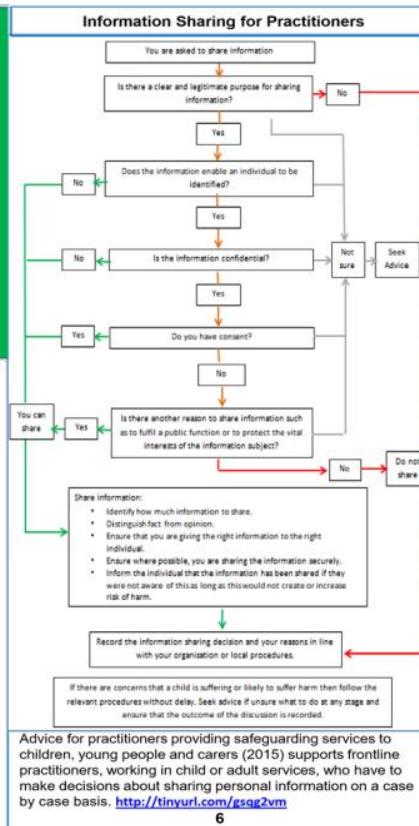
Red	Amber	Green
Urgent child Protection cases where the child appears to be at risk of imminent danger requiring urgent action – MASH must make a decision within four hours	Cases where the child/family requires targeted Support. MASH Must make a decision within 24 hours	Children/family that require Support that can Be offered via Universal Services or Some Targeted Support. Referred to alternative services and recommended for appropriate support services within 72 hours

### THE POLICE AND MASH

#### How does the MASH deal with Police Contacts?

Police contacts are created when a child or young person comes to the notice of the police with concerns about the child or young person's welfare.

The Joint Child Protection Investigation Team (JCPI) is based at HQ in Welwyn Garden City and will respond to the following: Contacts which involve reports of Physical Abuse in Children under 16 or sexual assault where the offender is a family member, a professional who works in a position of trust, Confirmed Cases of Fabricated Induced Illness, Female Genital Mutilation, Child on Child Sexual offences where the victim is under 13 years old are also referred to the JCPI. All Children and Young People police referrals which fall outside of the above are referred to Children's Services for further consideration and information sharing which may include MASH.



## MASH IN HERTFORDSHIRE Safeguarding Children

### Multi-Agency Safeguarding Hub

In Hertfordshire's MASH, Children's Services and partner agencies work side by side to safeguard children, prevent delay for families and ensure they receive the right response and service at the right time.

Professionals making a referral please use the details below:

#### Complete a Contact-

<https://eservices.hertfordshire.gov.uk/services/child-protection-referral> or if Urgent Phone- 0300 123 4043. NB- If child is felt to be at risk of immediate danger or a crime is committed is call



## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

Referrers will continue to follow existing processes for making a professional contact to Children's Services.

The Customer Service Centre will filter all contacts and forward appropriate cases to the MASH or directly to the relevant teams e.g. Early Help/Targeted Teams, Joint Child Protection Investigation Team etc.

The Hertfordshire MASH went live in July 2015 and is now well embedded. The team is based at Farnham House in Stevenage.

Agencies included in the MASH are Health, Police, National Probation Service, BeNCH (Bedfordshire, Norfolk, Cambridge and Hertfordshire Probation Service dealing with medium to low risk cases) and Children's Services. MASH team members also work closely with partners who are not based in the MASH such as Housing/Schools/Education Providers/GPs etc.

### About the MASH

The MASH brings together key agencies to work together as a team, to share information, assess risk and make decisions jointly about the best way to safeguard and meet the needs of vulnerable children ensuring that they: *'receive the right response at the right time with the right service'*

The Hertfordshire MASH will deal with contacts and referrals sent by members of the public and professionals to Children's Services for a safeguarding response. Where the MASH team consider that the child's welfare will be better met by Early Help services, they will ensure referrals get to the most appropriate teams and will inform referrers of the outcome of their request for a safeguarding assessment.

2

### Before you make a referral please consider the points below:

- Have you shared your concerns with the family (if appropriate)? If not, why?
- Consider whether the family would benefit from a FFA (Families First Assessment) or Graded Care Profile. Do your concerns meet safeguarding threshold (refer to Continuum of Needs document) <https://www.hertfordshire.gov.uk/media-library/documents/childrens-services/hscb/professionals/continuum-of-needs-hscb-march-2017-final.pdf>
- If your concerns meet safeguarding thresholds and you are making a referral, check the quality of your referral and ensure it has as much detail as possible about the concerns you have, what actions (if any) have previously been taken.
- Have you got consent from the family/those with parental responsibility? Having consent makes it much easier for partners in the MASH to gather and share information and prevents delay. **However, lack of consent should not be a barrier to referring if you have concerns about a child's welfare**

### What happens to my referral?

The Children's Services Managers who are Qualified Social Workers within the team will rate the contacts as High (RED), Medium (AMBER) or Low (GREEN) to signify the level of risk.

If the Rag rating is Green the family will receive advice and guidance within MASH or get their contact passed to Early Help Services to consider a Families First Assessment.

For contacts Rag Rated AMBER or RED the multi-agency team will undertake checks within their own agency and share relevant and proportionate information to inform their risk assessment and decision making.

## SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY

Once the information is received a final risk rating will be given; this may increase or lower the risk according to the information shared.

A multi-agency decision will then be made about what service will best meet the child's needs.

The professional referrer will be informed of the outcome.

3

### What the MASH needs from you.

#### Information Sharing

Information sharing is vital to safeguarding and promoting the welfare of children and young people. Consent to share must ideally be gained. Where this is not possible, consent is refused or where seeking it may undermine the prevention, detection, or prosecution of a crime, the practitioner must judge from the facts whether there is enough public interest for a justification to share; this must be decided on a case by case basis. It is important to note that a lack of information sharing is a consistent theme within Serious Case Reviews.

**All partner agencies in the MASH have signed an information sharing agreement in line with Section 10 and 11 of the Children Act 2004.**

You may be contacted by a Children's Information and Advice Officer (CIAO) or your agency representative in the MASH. Depending on the rating of the case, information will have to be returned within a specified time frame and you will be told the rating of the referral when you are contacted.

**Keep a record** of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. If you decide not to share, then record why. If you are unsure about what to share speak with your agency representative in the MASH.

**Timescales** the MASH uses a **RAG** rating system to signify the level of risk. The level of risk denotes the time that the MASH has to process the case.

**SEC & SEP SAFEGUARDING & CHILD PROTECTION POLICY**  
**APPENDIX 16**

### **Admission Register**

The School has an admissions register and an attendance register. All students are placed on both of these registers.

**It is a legal requirement that the School must inform their local authority of any student who is going to be removed from the admission register, including where the student:**

- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The local authority must be notified when the School is to remove a student from its register for any of the five grounds above. This should be done as soon as these grounds for removal from the register are met, and in any event no later than removing the student's name from the register.

**The School must inform the local authority of any student who fails to attend regularly, or has been absent without permission for a continuous period of 10 School days or more, at such intervals as are agreed between the School and the local authority.**