



Safeguarding Policy

This policy applies to the Senior School, Prep School, Pre-Prep School and Early Years Foundation Stage.

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Next Review	January 2021	

**Safeguarding Governor on behalf of the Governing Body – Dr Charlotte Duncan
Board of Governors**

NB: This is dynamic document this is constantly being reviewed and shared with all staff & governors.

1. POLICY AND STATEMENT PRINCIPLES

Our core safeguarding principles are:

- The School's responsibility to safeguard and promote the welfare of children is of paramount importance
- Safer children make more successful learners
- Staff must be aware of the signs of abuse and neglect and maintain an attitude of '*it could happen here*'
- We also recognise our Duty of Care and responsibilities towards pupils who are over the age of 18, who may be deemed to be "adults at risk" under the Care Act 2014.

This policy was formally adopted by the Governors in September 2019 and is reviewed annually. It is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

This policy has been created using the following guidance:

- [Keeping Children Safe in Education \(Department for Education September 2020\)](#)
- [Working Together to Safeguard Children \(Department for Education September 2018\)](#)
- [What to do if you're worried a child is being abused \(Department for Education March 2015\)](#)
- [The Prevent Duty \(Department for Education June 2015\)](#)
- [GDPR and Data Protection Act 2018](#)

Along with the Local Safeguarding Children Partnerships – who provide **advice or information**:

- Northamptonshire: 0300 126 1000 or
01604 626938 (if outside normal office hours)
- Bedfordshire: 0300 300 8585
- Buckinghamshire: 0845 4600001
- Leicestershire: 0116 305 5500

Risk of imminent significant harm to a child – call 0300 126 1000 or **999**

Terminology

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

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

Child Protection Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare and wellbeing of all pupils. We endeavour to provide a secure and welcoming environment where children feel safe and are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children are treated fairly, receive effective support and protection.

The procedures contained in this policy apply to all staff, volunteers and Governors and are consistent with national and local procedures.

Policy Principles:

- Welfare of the child is paramount
- All pupils, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff, volunteers and governors have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in safeguarding issues will receive appropriate support
- The School recognises the safeguarding needs of pupils who are over the age of 18 and who may be deemed to be 'adults at risk'

Policy Aims:

- To provide all staff, volunteers and Governors with the necessary information to enable them to meet their safeguarding responsibilities
- To ensure consistent good practice
- To demonstrate the School's commitment with regard to safeguarding to pupils, parents and outside bodies

2. THE EDUCATION ACT 2002

Section 175 of the [Education Act 2002](#) requires Local Education Authorities and the Governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

[Section 157 of the same Act and the Education \(Independent Schools Standards\) \(England\) Regulations 2003](#) 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.

3. ROLES AND RESPONSIBILITIES

Key personnel

The Designated Safeguarding Lead is:

Qin Wiseman (DSL & Online Safety Lead) – Senior School’s Deputy Head (Pastoral)
email: qiw@wellingboroughschool.org

Claire Petrie (Prep DSL & Deputy Online Safety Lead) – Prep School’s Deputy Head
email: cp@wellingboroughschool.org

Rebecca Girling (Lower Prep & EYFS DSL) Head of the Lower Prep
email: rmg@wellingboroughschool.org

Deputy DSLs by School are:

Fiona Burgess (Senior Deputy DSL) Head of PSHCE
email: fjb@wellingboroughschool.org

Sarah Baxby (Senior Deputy DSL) Head of Sixth Form
email: sjb@wellingboroughschool.org

Lee Hilton (Senior Deputy DSL) Director of Sport
email: lmh@wellingboroughschool.org

Jo Rowley Burns (Upper Prep Deputy DSL) – Pastoral Coordinator
email: jb@wellingboroughschool.org

Kate Wood (Lower Prep Deputy DSL) Prep School
email: k1m@wellingboroughschool.org

The nominated Safeguarding member of the School Council is:

Dr Charlotte Duncan email: cdu@wellingboroughschool.org

The Heads are:

Andrew Holman (Senior) email: anh@wellingboroughschool.org

Kath Owen (Prep) email: ko@wellingboroughschool.org

Designated Safeguarding Lead (DSL)

Due to their day-to-day contact with pupils, School staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that school staff are alert to possible signs of abuse or neglect and understand the procedures for reporting their concerns.

All three Schools have senior members of staff, named above, to coordinate child protection arrangements.

The DSL:

- Takes the lead responsibility for safeguarding and child protection (including online safety)
- Undergoes updated Safeguarding training every year
- Understands how to identify possible signs of abuse
- Acts as a source of support and expertise to the School community
- Help to promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school staff
- Has regular contact and has a clear understanding of the [Northamptonshire's Safeguarding Children's Partnership \(NSCP\) procedures](#) and the Four Levels of Need which can be found in the "[Northamptonshire Thresholds and Pathways](#)" guidance
- Keeps written records of all concerns, ensuring that such records are kept, stored and transferred correctly
- Refers cases of suspected abuse or neglect to Children's Social Care or police as appropriate
- Notifies Children's Social Care if a child, with a child protection plan, is absent without explanation
- Ensures that when a pupil with a child protection plan leaves the School, their information is passed to their new school, and the pupil's social worker and key staff, such as the SENCO, are aware of any needs
- Recognises the additional risks that children with SEN and disabilities (SEND) face online and are confident they have the capability to support SEND children to stay safe online
- Attends and/or contributes to child protection conferences, reviews and Core Group meetings
- Coordinates the School's contribution to child protection plans
- Develops effective links with relevant statutory and voluntary agencies such as Children's Social Care, Child and Adolescent Mental Health Services, the Educational Psychology Service, Behaviour Support Services and the Education Welfare Service
- Ensures that all staff sign to indicate that they have read and understood the Safeguarding Policy
- Ensures, in conjunction with other DSLs, that the Safeguarding Policy is updated annually and adopted by the Governing Body
- Liaises with other DSLs, with the nominated Governor and the relevant Head as appropriate
- Ensures all staff and volunteers undertake appropriate training & induction and keeps a central record of attendance
- Will make the Safeguarding Policy available to parent(s) and carer(s), pupils and volunteers
- Will report to the relevant welfare agencies within 24 hours of a disclosure. In a case of serious harm, the police should be informed immediately
- Promote an awareness of the Prevent Strategy and assess the level of risk of pupils' vulnerability to extremism
- In accordance with 'Keeping Children Safe in Education', the DSL is the Single Point of Contact for concerns about possible radicalisation of pupils, parents/carers or staff

The Governing Body has responsibility to ensure that the School has:

- In each part of the School a DSL for safeguarding, who is a member of the Senior Leadership Team and who has undertaken annual Level 3 Safeguarding and inter-agency training
- A Safeguarding Policy and procedures consistent with national and local guidance which are reviewed annually and are accessible to staff, volunteers & parent(s)/carer(s)
- Procedures for dealing with allegations of abuse made against members of staff including allegations made against the Headmaster
- Safer recruitment procedures that include the requirement for stringent checks and a Single Central Record
- A training strategy that ensures all staff and volunteers, including the Heads, receive safeguarding training/induction with appropriate refresher training on a regular basis. The DSLs undertake refresher training every year and continuously update their knowledge through attendance at relevant courses, conferences, LSCP dissemination events and online programmes
- Arrangements to ensure that all temporary staff, volunteers and Governors are made aware of the School's safeguarding provision

The Governing Body nominates a member (normally the Chair) to be responsible for liaising with the [Local Authority's Designated Officer \(formerly known as the LADO\)](#) and other agencies in the event of an allegation being made against the Headmaster.

An annual report will be submitted to the Governors at the Trinity Term Governors' Meeting about how the Governing Body's duties have been carried out. Any weaknesses will be rectified without delay.

The Heads

- Ensure that the Safeguarding Policy and procedures are implemented and followed by all staff
- Ensures appropriate risk management is undertaken for all school based/led activities
- Allocate sufficient time, funding, training, resources and appropriate supervision to enable the DSLs and deputies to carry out their roles effectively, including the assessment of pupils 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 in accordance with the Whistleblowing procedures available on the School's Resources Area
- Ensures that pupils' safety and welfare is addressed through the curriculum.

4. GUIDANCE FOR PARENT(S) / CARER (S)

The School works hard to build trusting relationships with parents in order to create a safe and happy environment in which children can develop and thrive. It follows the Early Help guidelines and works with parents/carers and outside agencies to help support families. The School will, when appropriate, discuss concerns with the parents/carers to help find solutions. The School takes a neutral, non-judgemental position but always puts the duty of care to the child as its priority.

The School has a duty of care to refer concerns of a child being at harm, or risk of harm, to MASH (Multi-Agency Safeguarding Hub). If a child is considered to be at immediate risk of harm the parents/carers will not always be contacted first. The confidentiality clause holds for all communication with parents/carers. Parents/carers should not discuss safeguarding concerns about their child or another child with other people.

If your child tells you of a safeguarding concern you have three options:

- contact one of the DSLs at Wellingborough School
- report it directly to the Multi-Agency Safeguarding Hub (MASH) 0300 126 100 (option 1)
- contact **Northamptonshire's Designated Officer on 01604 367 268**

Reassure your child that it was the right thing to do. If your child promised to keep it a secret, say that when someone is at risk of harm or being harmed, or that a child is feeling burdened by a secret, it's OK to break promises or secrets.

5. GOOD PRACTICE GUIDELINES FOR ALL STAFF

"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 in an emergency but, where referrals are not made by the Designated Safeguarding Lead, the DSL should be informed as soon as possible. Where a member of staff disagrees with the actions of the DSL, they should follow the challenge procedures described in this Policy."

(Keeping Children Safe in Education – 2020)

To meet and maintain our responsibilities towards pupils we need to agree standards of good practice. Good practice applies to all staff and includes:

- Ensuring children are aware of what unacceptable behaviour is and what constitutes unsafe situations
- Ensuring children are aware of who they can talk to and when and how they can get help
- Ensuring children are aware of how to keep themselves and others safe (also in relation to online safety)
- Treating pupils with respect
- Understanding that poor mental health could be an indicator of abuse, neglect or exploitation
- Setting a good example by conducting ourselves appropriately and in accordance with the School's **Staff Code of Conduct**
- Involving pupils in decisions that affect them
- Encouraging positive and safe behaviour among pupils
- Being a good listener
- Being alert to changes in pupils' behaviour
- Recognising that challenging behaviour may be an indication of abuse or neglect
- Reading and understanding the School's **Safeguarding Policy** and guidance documents on wider safeguarding issues, for example, bullying, physical contact and information sharing
- Staff should have regard to the guidance contained in, '[What to do if you're worried a child is being abused](#)' (DfE 2015)
- Staff are aware that they need to respond appropriately to children with SEND and need to acknowledge their individual needs
- If you are not satisfied with the DSL's decision, you are able to contact the relevant MASH team directly.

All staff and Governors should be aware of the systems within the School which support safeguarding and these are explained, as part of the staff, volunteers and Governor induction process. This should include reading and understanding:

- the School's Safeguarding Policy;
- Part 1 and Annex A of 'Keeping Children Safe in Education' (September 2020);
- the School's Staff Code of Conduct; and
- the role of the School's Designated Safeguarding Lead (DSL).

Up-to-date copies of policies and a copy of Part 1 and Annex A of '[Keeping Children Safe in Education](#)' (2020) are provided at induction and can be found on **Firefly**.

All staff and Governors receive appropriate safeguarding training, which is regularly updated. In addition, all members of staff receive safeguarding and child protection updates by email and through staff meetings, as required, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff are aware of the Early Help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an [Early Help Assessment](#).

All staff should 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.

All staff should 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 DSL and Children's Social Care. Staff should 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.

6. SPECIFIC SAFEGUARDING ISSUES

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 and colleges can be found on the [TES website](#) and the [NSPCC website](#). Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- [children and the court system](#)
- [children with family members in prison](#)
- [child missing from education](#) – and see para 27
- [child missing from home or care](#)
- [child sexual exploitation \(CSE\)](#) – and see para 21
- [contextual safeguarding](#)
- [county lines](#)
- [domestic violence & abuse](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#) – and see para 22
- [forced marriage](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [homelessness](#)
- [mental health](#)
- Peer on peer abuse:
 - [bullying including cyberbullying](#)
 - [sexting](#)
 - [sexual violence and sexual harassment](#)
- [teenage relationship abuse](#)
- [private fostering](#)

- [preventing radicalisation](#)– and see para 11
- [trafficking](#)
- [upskirting](#)

7. EARLY HELP

'Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Providing Early Help is more effective in promoting welfare of children than reacting later.'

([Working Together to Safeguard Children - 2018](#))

Wellingborough understands the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records and listening to the views of the child. Central to this is reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. Pupils deemed to require additional support (but not meeting the threshold for referral to Children's Social Care) will be monitored using inter-agency assessments and the Early Help guidance (formerly the Common Assessment Framework - CAF).

The School will monitor such cases using the thresholds for referral in accordance with the Early Help guidance and thresholds document, published by the appropriate Local Safeguarding Children Partnership (LSCP), and in the case of borderline cases contact the relevant Local Referral, Intervention & Assessment Services for advice. The House-based 'Pastoral Report Form' will form the basis of fortnightly meetings between the DSL and the relevant Senior House Staff. The DSL will refer to LSCP's publication '[Early Help: Multi-agency levels of need guidance](#)'.

8. ABUSE OF TRUST

All School staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. All teaching staff are required to **read and understand** Part 1 of the 'Keeping Children Safe in Education (September 2019)' guidance as part of their induction.

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.

9. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, Wellingborough School will give special consideration to those pupils who are:

- Disabled or have special education needs
- Living in a domestic abuse situation
- Affected by parental substance misuse or mental illness
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations

- Vulnerable to discrimination and maltreatment on the grounds of gender, race, ethnicity, religion or sexuality
- Do not have English as a first language
- Young Carers
- Pupils whose harmful behaviours might render them at greater risk – e.g. substance misuse, alcohol abuse, gender-based violence, sexting, 'hazing', etc.

10. DOMESTIC ABUSE (DA)

Domestic abuse comprises a broad range of behaviours, which can often overlap. The current Government definition of DA is:

"Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality."

Children react to DA in different ways depending on the level of their exposure to the abuse, the maturity of the child and the severity of the abuse taking place in the home. Children who live in households where DA occurs are likely to suffer physical, psychological and emotional harm. Women's Aid has highlighted some of the potential effects of children witnessing DA as:

- Anxiety or depression
- Difficulty sleeping
- Nightmares or flashbacks
- Physical symptoms, such as tummy aches
- Bed wetting
- Temper tantrums
- Acting younger than their age
- Internalising distress and becoming withdrawn
- Low self esteem

Older children may:

- Self-harm
- Develop an eating disorder
- Run away
- DA may also affect the way a child or young person forms future friendships and relationships

11. APPROPRIATE TOUCH

Guidance for Safer Working Practice for Adults working with children and Young People (DCSF 2009) acknowledges that 'there are occasions when it is entirely appropriate for adults to have some physical contact with the child or young person with whom they are working.' A 'no-touch' approach is viewed as impractical. This guidance was superseded in 2015 with the guidance produced by CAPE (Child Protection in Education) and endorsed by the DfE.

As stated in the School's **Code of Conduct** for staff and volunteers, we define the appropriate use of touch as:

- Situations in which abstinence would actually be inhumane, unkind and potentially psychologically damaging
- Not invasive, humiliating or could possibly be considered as eroticising / flirtatious
- Appropriate places to touch are shoulders, arms and back

Some physical contact may be necessary to demonstrate techniques during PE and Games lessons, Music lessons and times when a member of staff is administering first aid. Young children and children with special education needs may require staff to provide physical prompts or help. Touching may also be appropriate where a pupil is in distress and needs comforting. The guidance emphasises that 'adults should only touch children with their permission and in ways that are appropriate to their professional or agreed role and responsibilities'. Touching should, where possible, take place within the view of other people.

There may be some children for whom touching is unwelcome, this may be, for example, due to their cultural background, specific learning needs or because they have been abused and adults need to respect this.

Physical contact with pupils becomes increasingly open to question as pupils reach and go through adolescence, and staff should be aware that even innocent and well-intentioned physical contact can be misconstrued. The DSL should be contacted by any adult or pupil who is concerned about any aspect surrounding physical contact of any kind.

Adults should acknowledge, record and report to their line manager any accidental or inadvertent physical contact with a pupil, which might otherwise be misconstrued. This information will be shared with parents/carers as appropriate.

12. PREVENTING RADICALISATION (THE PREVENT DUTY)

The School recognises its duty as a Specified Body under the Counter Terrorism & Security Act 2015, to have regard for the need to prevent people from being drawn into terrorism. In meeting these requirements, we will follow the DfE's advice document, '[Improving the spiritual, moral, social and cultural \(SMSC\) development of pupils: supplementary information](#)' (Nov 2014) and make appropriate use of resources and training programmes referenced in the DfE's 'Educate Against Hate' website; including the College of Policing's, Channel General Awareness Module www.educateagainsthate.com.

We recognise that it is a key role of the School to support children and that School may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the possible signs of vulnerability and/or susceptibilities to any extremist indoctrination.

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

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. The Department for Education has dedicated a telephone helpline (**020 7340 7264**) to enable staff and Governors to raise concerns relating to extremism directly. Concerns can also be raised by email to **counter.extremism@education.gsi.gov.uk**. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

Concerns about the possible radicalisation of pupils, parents/carers or staff should be reported to the Designated Safeguarding Lead, who is the School's Single Point of Contact (SPOC) for 'Prevent'.

13. COMPLAINTS PROCEDURE

The **Complaints Procedure** will be followed where a pupil or parent/carer raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. 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.

14. IF YOU HAVE CONCERNS ABOUT A COLLEAGUE

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The School's **Whistleblowing Policy** enables staff to raise concerns or allegations in confidence and allows a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Head. Complaints about the Head must be reported to the Chairman of Governors, who will liaise with the Local Authority's Designated Officer, as appropriate.

15. ALLEGATIONS OF ABUSE OR MISTREATMENT OF A PUPIL BY A MEMBER OF STAFF OR A VOLUNTEER

Allegations must be brought to the attention of the Headmaster, unless the allegation concerns them, in which case this will be notified to the Chair of Governors, who will liaise with the Designated Officer in accordance with Part 4 of KCSIE and appoint a Case Manager, as appropriate.

The First Response

We will respond promptly and sensitively to the legitimate concerns of the victim and his or her family. We undertake to:

- Take any allegation of abuse, involving a member of staff, very seriously
- Establish the facts before jumping to any conclusion
- Involve the Northamptonshire Safeguarding Children Partnership (NSCP) by contacting the relevant Designated Officer within 24 hours of a disclosure or suspicion of abuse
- Following advice from the DO the School may inform the member of staff concerned honestly of the allegation that has been made, and advise him or her to contact their Trade Union or Professional Association for advice and support
- Following advice from the DO the School may inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place, unless the allegation involves the parents/carers, in which case we will contact the Children's Social Care before making contact

The Next Step

The DO will determine if a Strategy Meeting/Discussion is required to determine how the matter will be progressed in respect of both the alleged perpetrator and child/children involved. Although a formal investigation is a matter for specialists, where the facts suggest that there may be reasonable grounds for suspecting actual abuse, or grooming of a child, or other criminal behaviour, we will always:

- Invite the police to conduct the investigation
- Consider suspending the member of staff (or volunteer) concerned

Support for the Pupil

Our priority is to safeguard the young people in our care. We will give all the support that we can to a pupil who has been abused. The Head together with, the School's DSL for the relevant part of the School, will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, guardians, NSCP or other agencies involved to identify the support strategies that will be appropriate.

Suspension

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Even so, it is a serious step, and we will take legal advice beforehand, and will normally only suspend a member of staff where:

- There is a serious risk of harm (or further harm) to the child
- The allegations are so serious as to constitute grounds for dismissal, if proven
- The police are investigating allegations of criminal misconduct

We recognise fully that we have a duty of care towards all of our staff, and we will always:

- Keep an open mind until a conclusion has been reached
- Interview a member of staff before suspending him or her
- Keep him or her informed of progress of the investigation

Any member of staff who is invited to a meeting whose outcome is likely to result in his or her suspension, is entitled to be accompanied by a work colleague or Trade Union representative.

Where it has been agreed to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as possible for the reasons for the suspension.

Alternatives to Suspension

We will always consider whether an alternative to suspension might be appropriate. Possibilities include:

- Sending the member of staff on leave
- Giving him or her non-contact duties
- Ensuring that a second adult is always present in the classroom when he or she teaches
- Moving the child to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted

If the member of staff resigns

The resignation of a member of staff or volunteer mid-way through an investigation would not lead to the investigation being abandoned. Our policy is always to complete every investigation into allegations of child abuse.

If a member of staff fails to cooperate with a management investigation, or resigns ahead of or during a management investigation or disciplinary process, they will automatically be referred to the Disclosure and Barring Service for consideration of discretionary barring.

Settlement (formerly Compromise) Agreements

The policy at Wellingborough School is to follow the DfEs KCSIE guidance on the use of settlement agreements in cases of child abuse which is:

"Settlement agreements, by which a person agrees to resign, and a school agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, must not be used in these cases. In any case, such an agreement will not prevent a thorough police

investigation where that is appropriate. Nor can it override the statutory duty to make a referral to the DBS, where circumstances require it".

Length of Investigatory Process

We recognise that everyone's interests are served by completing any investigatory process as swiftly as possible. The School is a small community and we will aim to spend as little time as is compatible with fair and impartial processes on the investigatory process. We would expect almost every case to be completed within one month. However, this timescale may be dependent on other bodies who may be involved in the investigation.

Referral to the Disclosure & Barring Service

Like all schools, we have a statutory legal duty to refer an individual, where there is the risk that he or she may harm, or has caused harm to children, to the Disclosure & Barring Service (DBS) within one month of the individual's dismissal or resignation because he or she has been considered unsuitable to work with children. Reports concerning members of staff or volunteers are normally made by the DSL. If the DSL is involved, the report is made by the Head. If the Head is involved, the report is made by the Chairman of Governors.

The referral form can be downloaded from the DBS website on (www.gov.uk/government/publications/dbs-referrals-form-and-guidance). The School plays no part in the subsequent process of barring individuals from working with children and/or vulnerable adults. We also have a legal duty to respond to any requests for information that we receive from the DBS at any time.

The School would also consider making a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

Recording Allegations of Abuse

Allegations that are deemed to be malicious must be removed from HR records relating to the member of staff concerned. Other allegations can be recorded, along with outcomes and can be kept in a sealed envelope, to be opened only by the Head in the event of subsequent or historical disclosures. A copy of this record should be given to the member of staff concerned. False, unsubstantiated or malicious allegations cannot be referred to in any employment reference.

Anonymous Allegations

If we are faced with an anonymous allegation of child abuse, which names both a member of staff and a child, we will handle it in exactly the same way as if we knew the identity of the person making the allegation. We will report the matter to the DO and be guided by them in our handling of the allegation. Where the allegation names the member of staff; but not the pupil, we will normally interview the member of staff, and ask for his or her version of events, unless the DO has advised a different course of action. It could be appropriate to establish a mentoring or review programme for that individual, or to provide him or her with further training. A record would normally be kept.

Handling Unfounded or Unsubstantiated Allegations

The Child

A child who has been the centre of unfounded or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. We will liaise closely with the NSCP and DO in order to set up a professional programme that best meets the child's needs, which may involve the Child and Adolescent Mental Health Services and an Educational Psychologist, as well as support from the School Counsellor. We shall be mindful of the possibility that the allegation of abuse was an act of displacement, masking abuse that is actually occurring within the child's own family and/or community.

However much support the child may need in such circumstances, we need to be sensitive to the possibility that the aftermath of an unfounded allegation of abuse may result in the irretrievable breakdown of the relationship with the teacher. In such circumstances, we may conclude that it is in the child's best interests to move to another school. We would do our best to help him/her to achieve as smooth a transition as possible, working closely with the parents or guardians.

The Member of Staff

A member of staff could be left at the end of an unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun him/her on the grounds of "no smoke without fire". If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised; we recognise that he or she is likely to need both professional and emotional help. We will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the School community. A short sabbatical or period of re-training may be appropriate. 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 also be appropriate. Details of allegations that are found to have been malicious should be removed from personnel records and kept in a sealed envelope, only to be opened by the Head in the event of any future allegation concerning that incident/complaint, as a safeguard for the member of staff and the School.

Allegations against former staff

Allegations against a former member of staff should be sent directly to the Head, who will inform the MASH team and their DO, or in an emergency, the Police.

Allegation of Abuse of a Child who is not a pupil at the School

If we were given information that suggested that a member of staff was abusing a child who was not a pupil at the School, we would immediately pass such information to the LSCP's MASH team to handle. We would then, subject to guidance from the NSCP, interview the member of staff and formally advise him/her of the allegations, making it clear that the School would not play any part in the investigatory process. He or she would be advised of the possibility of facing suspension, re-assignment to other duties etc., in exactly the same way as if the allegation had involved a School pupil. If the allegation subsequently proved to be unfounded, he or she would be given full support by the school in resuming his/her career.

Allegations involving the Head or Designated Safeguarding Leader

The Chairman of Governors must be told at once by the Deputy Head or DSL of any allegation involving the Head. They will liaise with the Designated Officer in accordance with Part 4 of KCSIE and appoint a Case Manager, as appropriate. The Head will normally be suspended for the duration of the investigatory process and be asked to vacate his school residence, and one of the Deputy Heads will be made acting Head until the conclusion of the investigation and resolution of the issue.

The Head should similarly be told at once of any allegation involving the DSL. The Chairman of Governors should normally be informed on the same day. The DSL will normally be suspended for the duration of the investigatory process. The Deputy DSL for the appropriate part of the School will become the DSL until the conclusion of the investigation and resolution of the issue.

16. SAFER RECRUITMENT

The School aims to create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children. We will adhere to Safer Recruitment principles and best practice, as identified by the Safer Recruitment Consortium.

The Whole School Governing body and proprietors must act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence including: criminal record checks

(DBS checks), barred list checks and prohibition checks, together with references and interview information. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in a school. For most appointments, an enhanced DBS check with barred list information will be appropriate as the majority of staff will be engaging in regulated activity.

The School keeps a Single Central Record. The Single Central Record (SCR) must cover the following people:

- all staff (including supply staff) who work at the School
- all others who work in regular contact with children in the School including volunteers; and
- all members of the proprietor body.

17. EXTRA-CURRICULAR AND EDUCATIONAL VISITS

Where extra-curricular activities are provided by and managed by the School, our own Safeguarding Policy and procedures apply. If other organisations provide services or activities on our site the staff responsible will check that they have appropriate procedures in place, including safe recruitment procedures and risk management strategies, in accordance with [National Guidance](#).

When our pupils attend off-site activities, the staff responsible will check that effective safeguarding arrangements are in place and follow the School's **Educational Visits Policy**.

18. MOBILE PHONES AND DEVICES

Pupil Use

In the Senior School, pupils are permitted to have their mobile phones on them during the school day. Their mobile phones may be used in class for educational purposes, but **express permission must firstly be sought from a teacher**. Misuse of mobile phones on School grounds or in class will result in confiscation and a two-hour SLT Detention.

If there is reason to suspect that a pupil-owned mobile device contains inappropriate, illegal or harmful content, whilst on School grounds, it will be confiscated by staff and may be searched by authorised staff. The Online Safety Incident flowchart and Safeguarding procedures will be followed if such content is discovered.

No pupil, parent or anyone else should be taking or storing pictures or sound recordings on the School premises without good reason and the appropriate prior permissions, both of the School and of anyone appearing in the images/recordings. Similarly, pupils are not allowed to publish web pages, photographs or recordings of pupils, staff or school premises, without permission of the School.

Pupils may bring personal laptop/tablet computers into school and use them to access the School's Wi-Fi network for educational purposes, subject to acceptance of the **Acceptable Use of Technology (AUP)**, and registration through the Cloudpath authentication system. Internet access will remain filtered and all activity logged; any attempt to bypass such monitoring is not permitted. Pupils may also connect personal computers to the managed print system wirelessly, which is again subject to monitoring, and abuse of such facility may lead to it being withdrawn. Pupils may only use devices during timetabled activities including tutor time, detentions and off-games periods with the specific permission of the supervising member of staff. Limited use for specific purposes is expected in view of the dominance of paper and pen methods of assessment in all public examinations.

Staff use

Staff may bring personal mobile phones or devices into School, but they will be used outside lesson time only and in a discreet manner. Staff have a responsibility to report other staff's misuse of mobile

phones and/or devices during the school day.

Under no circumstances will staff use their personal mobile phone or device to communicate with current or former pupils or their parents/carers. School telephone numbers or mobile phones must be used for this purpose, including educational visits. **All images or video recordings of children and young people will be taken using School equipment & memory cards, never stored on personal camera phones or other such devices.** It is the responsibility of staff to ensure that no inappropriate or illegal content is stored on their device when bringing it onto School grounds.

Visitors' Use

Visitors are asked to use their mobile phones with discretion and to always put their phones to silent, whilst on the grounds.

19. VIDEO AND PHOTOGRAPHS

While it is recognised that the use of photography is as an important opportunity to add colour, life and interest within the School, all imagery must always be used in a responsible way. As photographs are considered to be personal data, both the 'Keeping Children Safe in Education' guidelines and the Data Protection Act 1988 regulations must be observed. Therefore, the need to respect both pupils' and parents'/carers' rights of privacy and be aware of potential safeguarding issues must always be taken into account when taking photographs. To meet these responsibilities, the School has the following measures in place:

- Images or videos featuring pupils will only feature on the School website or in press coverage if permission has been granted by parents/carers in advance
- Images should only be used for the purposes agreed at the time of consent
- For 'Looked-After children', consent is needed from their allocated social worker
- Digital images of pupils must be stored in a way that they can be deleted in entirety and they should not be kept for longer than is necessary for their original purpose
- If a recording device is lost it must be reported to the relevant DSL immediately the loss has been identified
- The School must keep control of all digital images taken by staff or pupils. Therefore, only School equipment should be used and USB sticks, camera storage cards, etc. must be kept onsite and securely stored, wherever possible
- Staff should, as much as possible, ensure that images of pupils cannot be viewed by unauthorised individuals and prevent their loss or theft; therefore, images should be removed from cameras, iPads, etc. and utilised appropriately as soon as practically possible
- Wherever possible group shots of pupils will be taken, as opposed to images of an individual and only first names can be displayed
- Photographs should not show pupils in compromising positions or in inappropriate clothing and settings. (e.g. toilets, changing rooms, swimming pool, etc.)
- Where agency photographers are being used, they should be DBS checked and accompanied

20. ONLINE SAFETY

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm and there are additional risks to children with SEND. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

Mobile phones and computers are a source of fun, entertainment, communication and education, and we embrace new technologies at Wellingborough School. However, we know that some adults and young people will use these technologies to harm children. Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and the School's **Anti-Bullying and Acceptable Use of Technology (AUP)** Policies explain how we try to keep pupils safe in school and online at home. Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedure.

The production and distribution of sexting or online images, involving anyone under the age of 18, is illegal and needs very careful management for all those involved. If a device is involved, staff should confiscate it and set it to flight mode or, if not possible, switch it off. They should then seek advice and report the incident to the DSL. The DSL will record the sexting or online incident, including both the actions taken and the actions that weren't taken. In applying judgement to each incident, the following will be considered:

- Is there a significant age difference between the sender/receiver involved?
- Is there any external coercion involved or encouragement beyond the sender/receiver?
- Do you recognise the child as more vulnerable than usual i.e. at risk?
- Is the image of a severe or extreme nature?
- Is the situation isolated or has the image been more widely distributed?
- Are there other circumstances relating to either sender or recipient that may add cause for concern i.e. difficult home circumstances?

If any of these circumstances are present, then this incident needs to be escalated, this could include reporting it to the Designated Officer or the police. If none of these circumstances are present, then the School needs to manage the situation, without escalating to external services. A record of the details of the incident, action and resolution will be kept by the DSL and logged onto CPOMS.

Training sessions will be considered each year taking parents and staff through the risks and advantages of new technologies. The School utilises training from CEOP's 'ThinkUKnow' programmes and materials.

21. CHILD SEXUAL EXPLOITATION (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

22. FORCED MARRIAGE (FM)

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party. Always call either the Contact Centre or the **Forced Marriage Unit 020 7008 0151**. The first point of contact for staff in relation to this matter should be the DSL.

23. FEMALE GENITAL MUTILATION (FGM)

From October 2015, all teachers (along with social workers and healthcare professionals) will have a [statutory duty](#) to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It is recommended that the member of staff concerned should consult with the DSL in the first instance unless there is immediate threat of harm or removal of the child. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols. Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate.

24. RECOGNISING ABUSE

All staff should be aware that abuse, neglect 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 and neglect are forms of maltreatment. The following definitions are taken from Chapter 1 of Working Together to Safeguard Children (2018):

Physical Abuse

Somebody may abuse or neglect a child by inflicting harm, for example by 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

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent and adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age – or developmentally – inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or

abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Bullying (*linked to **Anti-Bullying Policy** on the School website*)

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. Bullying is addressed at regular intervals in Personal, Social, Health, Citizenship Economic Well-being Education (PHSCE) and the School's **Anti-Bullying Policy** sets out the procedures and reporting mechanisms. In some circumstances safeguarding procedures will be considered.

Education Law makes it clear that bullying is unacceptable and that it is the duty of the school community to protect its members. The Education and Inspection Act gives Head Teachers the power "to such an extent as it is reasonable" to regulate the behaviour of pupils when they are off site which can allow incidents of cyberbullying to be dealt with.

Indicators of abuse – what you might see

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 DSL.

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

A child who is being abused or neglected may:

- Have poor mental health
- Have bruises, bleeding, burns, fractures or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather
- Be concerned about changing for PE or swimming
- Look unkempt and uncared for
- Display difficult behaviour
- Change their eating habits
- Have difficulty in making or sustaining friendships
- Appear fearful
- Be reckless with regard to their own or other's safety
- Self-harm
- Frequently miss school or arrive late
- Show signs of not wanting to go home
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- Challenge authority
- Become disinterested in their school work
- Be constantly tired or preoccupied
- Be wary of physical contact
- Be involved in, or particularly knowledgeable about drugs or alcohol
- Display sexual knowledge or behaviour beyond that normally expected for their age

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as **part of a jigsaw** and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.

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 behaviour and long-term medical or psychiatric difficulties.

The School will do everything in its power to reduce the impact of abuse as far as is possible during the time that the child is in our care. The action points for this will vary from child to child depending on the type of abuse, their age, circumstances and personal development.

25. PEER ON PEER/CHILD ON CHILD ABUSE

Children can abuse other children. This is generally referred to as **peer on peer/child on child abuse** and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment

Sexual violence

It is important that all staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003, as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

26. TAKING ACTION

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in KCSIE 2019 from paragraph 23 in Part 1. As is always the case, if staff are in any doubt as to what to do they should speak to the Designated Safeguarding Lead immediately.

Key points for staff 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 immediately
- Do not start your own investigation

- Share information appropriately but do not discuss the issue with colleagues, friends or family
- Record concerns as soon as is practically possible using **CPOMS**, the School's online record keeping system
- Continue to support the child
- Seek support for yourself if you are distressed

If you suspect a pupil is at risk from harm

Nothing is too trivial to check out! There will be occasions when staff may suspect that a pupil may be at risk, but have no 'concrete' evidence. The pupil's behaviour may have changed, their artwork could be bizarre and they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill.

It is fine for staff to ask the pupil if they are 'OK' or if they can help in any way.

Staff should discuss their concerns with the DSL and document their concerns on **CPOMS** and flag it as a Child Protection concern.

Child on child sexual violence and sexual harassment

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the School's **Anti-Bullying** and/or the **Online Safety** procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection procedures.

The care 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.

If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. 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 pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the pupil is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen, if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the pupils, staff will:

- Allow them to speak freely
- Remain calm and collected – the pupil may stop talking if they feel they are upsetting their listener
- Give reassuring nods or words of comfort – 'I am sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- Not be afraid of silences – staff must remember how hard this must be for the pupil
- **Under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about all this

- **Tell the pupil that in order to help them, information must be passed on to the DSL.**
The young person may agree to see the DSL with the staff member or alone. The staff member must inform the DSL either way
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing', may be interpreted by the child to mean that they have done something wrong
- Report verbally to the DSL even if the child has promised to do it themselves.
- It is his/her responsibility to write up their conversation as soon as possible and upload it onto **CPOMS** as a 'child protection' and 'safeguarding' concern (Child Protection Online Management System), this will automatically flag the concern to the DSL.
- Continue to support the child
- **Seek support from the DSLs if they feel distressed**

The safety of children is paramount in all decisions relating to their welfare. Any action taken by staff should ensure that no child is left in immediate danger.

Notifying parents

The School will normally seek to discuss any concerns about a pupil with parents/carers. If the concern is of a sensitive safeguarding/child protection nature the DSL will make a decision about how the concern should be handled and about making contact with the parents/carers. However, **if the DSL believes that notifying the parents could increase the risk to the child or exacerbate the problem**, advice will first be sought from the appropriate Multi-Agency Safeguarding Hub (MASH).

Referral to children's social care

The DSL will make a referral to the Multi-Agency Safeguarding Hub (MASH) for the area in which the pupil lives within 24 hours if it is believed that a pupil is suffering or is at risk of suffering significant harm or if advice/guidance is required.

The pupil (subject to their age and understanding) and the parents/carers will be told that a referral is being made – **unless to do so would increase the risk to the child.**

Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with the Northamptonshire Safeguarding Children Partnership (NSCP), police or the NSPCC if the situation is an emergency and the DSL, the Head and the Chair of Governors are all unavailable or they are convinced that a direct report is the only way to ensure the pupil's safety.

Some of our related guidance documents:

- Staff Handbook
- Staff Code of Conduct
- Acceptable Use (AUP) of Technologies Policy
- Complaints Procedure
- Whistleblowing
- Attendance Policy
- Children Missing Education Policy
- Guidance for Safer Working Practice
- Medical and First Aid Policy
- Anti-Bullying Policy
- Behaviour Policy
- Special Educational Needs
- Drugs Policy

- Admissions/accurate information/emergency contact details/arrangements for collection of child
- Disabled
- Safer recruitment/Induction/Training
- Curriculum (including sex education)
- Disciplinary and Exclusions Policy
- Educational Visits Policy
- Disability Discrimination

27. CHILDREN MISSING EDUCATION

We recognise that a pupil missing from an education setting, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School has a responsibility for knowing the whereabouts of pupils while they are in its care. In most circumstances, there will be a satisfactory explanation for a pupil's absence from a particular activity. It is, however, possible that a pupil will be absent without permission and it is hence imperative that any absence is followed up.

In the first instance the member of staff responsible for the activity should check with the relevant Reception (and their signing out sheet), the daily absence list, trip lists in and check with the School Nurse. If the pupil's name does not appear on any of the lists, their pastoral leads (i.e. Housemaster or Housemistress in the Senior School, Club Presidents in the Prep and SLT members in the Pre- Prep) should be informed. In the event that no satisfactory explanation is found for a pupil's absence, the missing person procedures should be followed. At this stage their pastoral lead should assume responsibility for following up the absence.

The School shall inform NSCP (Northamptonshire Safeguarding Children's Partnership) of any pupil who is going to be added or deleted from the School's Admissions Register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006. This will be done within 5 days of adding a pupil's name to the Admissions Register and either before or on the day of taking any pupil off roll as directed by NSCP and as described in Children Missing Education, 2016.

This will assist the NSCP to:

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

The School shall inform the applicable local authority of any pupil who:

- fails to attend school regularly; or
- has been absent without the school's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the Local Authority (or in default of such agreement, at intervals determined by the Secretary of State).

School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the school gives rise to a concern about their welfare.

28. LOOKED AFTER CHILDREN

The School acknowledges the vulnerability and additional needs of 'looked after children' (LAC) and will work with allocated social workers, carers, virtual Headteachers and relevant Local Authority services

to promote their inclusion, attendance, attainment and wellbeing of LAC and contribute towards their Personal Education Plans.

29. PUPILS OVER THE AGE OF 18

The School has a duty of care towards pupils over the age of 18. Pupils over 18 might be deemed to be at risk by virtue of a significant impairment of the mind or brain, which might affect their mental capacity and thereby places them at risk of abuse or exploitation.

Home-school pupil agreements highlight that information concerning the safety, welfare or wellbeing of over 18s will be shared with parents or carers, unless the pupil has specifically forbidden this.

Referrals will always be made to the appropriate Adults Social Cares service, where an individual is felt to be at risk of significant harm; a Mental Capacity Assessment may be necessary to safeguard that pupil.

30. RISK OF ANIMALS

As part of the Early Years Foundation Stage and across the year groups in the School, children may come into contact with animals, or other living creatures. This may be in the setting or as part of a visit. All animals have potential health and safety risks, we aim to ensure that children's contact with animals is in accordance with sensible hygiene and safety controls. Any relevant information regarding children's allergies or conditions is recorded on medical forms and appropriate measures are taken to ensure the children and animals are safe at all times.

Children wash their hands after handling the animal or creature and do not have any contact with animal faeces. Children are taught correct handling and care and are supervised at all times. Permission will be sought from parents/carers to allow children to touch the animals.

Any animals or creatures brought into School are the responsibility of the owner. Before any Educational visit is made to a place where there are animals, a risk assessment is carried out.

31. FIRST AID

Please refer to the School's **Medical and First Aid Policy** on the School's website.

Other than in an emergency, First Aid will only be administered by those qualified to do so and that all First Aid interventions will be recorded and reported to the parents or carers of the pupil.

32. CONFIDENTIALITY AND SHARING INFORMATION

All staff must understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved, but also to ensure that being released into the public domain does not compromise evidence.

Staff must only discuss concerns with the DSLs, Head or Chair of Governors (depending on who is the subject of concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need to know' basis.

Safeguarding information will be stored and handled in line with the Data Protection Act 1998 principles and in accordance with the Government's [Information Sharing Protocols](#).

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
- Secure

Safeguarding files will be kept safely and confidentially by the DSL. Every effort will be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. Safeguarding information will be stored separately from the pupil's School file and the School file will be 'tagged' to indicate that separate information is held.

Safeguarding records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent/carer to see child protection records, they will refer the request to the Head/DSL.

The Data Protection Act does not prevent School staff from sharing information with relevant agencies, where that information may help to protect a child.

The School's policy on confidentiality and information-sharing is available to parents/carers and pupils on request.

33. RETENTION OF CHILD PROTECTION RECORDS

When a safeguarding concern arises, the School maintains and retains child protection records for as long as the child continues to attend the School; original safeguarding records are transferred with the child, copies of the records are made and then retained until a child's 25th birthday. Records will then be securely disposed of and a record of disposal kept. Paper records will be shredded and electronic records deleted.

34. TRANSFER OF CHILD PROTECTION RECORDS

When children transfer to a new educational establishment, either at normal transfer stage (e.g. from School to Further Education) or as the result of a move (e.g. to another setting) and records of safeguarding /welfare concerns exist, these will be sent to the DSL at any receiving school, separately from academic records and under a confidential heading. This is done as soon as possible, **preferably within 5 days**. A note of the records transferred and written evidence of their receipt will be obtained. This transfer is arranged separately from the main pupil file in line with DoFE Guidance in 'Keeping Children Safe in Education' (2019).

Where children are dual registered any existing safeguarding records and any current concerns will be shared with the new establishment prior to the child starting, to enable the new establishment to risk assess appropriately. This communication is via a telephone conversation between the DSL in Wellingborough School and the DSL or Head in the new establishment prior to the transfer of records.

Where records of safeguarding concerns have been kept and details of a child's next place of education is not known, the DSL will inform the Multi-Agency Safeguarding Hub, MASH and follow their advice.

Child Protection records must always be passed directly and securely to the DSL in the receiving establishment.

All safeguarding records are transferred at each stage of a child's education, up until the age of 18, or in some cases, beyond. The responsibility for transfer of records lies with the originating setting, as the

receiving setting might not otherwise know that child protection concerns exist. The onus is therefore on the originating setting to facilitate the secure transfer of records, not on the receiving setting to make contact and collect the records. To ensure we have all necessary safeguarding records a letter asking if there are any such records is sent to every child's previous school within 4 weeks of them starting at Wellingborough School.

Paper or electronic records containing safeguarding information must be transferred in the most secure method available to the establishment:

- By hand if possible;
- If paper records are posted this should be by 'signed-for' delivery;
- Electronic records must only be transferred by a **secure** electronic transfer mechanism or after the information has been encrypted.

Written evidence of this transfer appropriately signed and dated, is retained by both the originating and receiving setting.

Children subject to a Child Protection Plan

If a child is the subject of a Child Protection Plan at the time of transfer the DSL must speak to the DSL of the receiving establishment giving details of the child's key Social Worker from Safeguarding and Children's Services and ensuring the establishment is made aware of the requirements of the Child Protection Plan.

If a child who is the subject of a Child Protection Plan leaves an establishment and the name of the child's new education placement is unknown, the DSL should contact the child's Social Worker to discuss how and when records should be transferred.

Storage

All safeguarding records are sensitive and confidential so should be kept in a secure (locked at all times) filing cabinet, separate from other education records and accessible to safeguarding leads and senior staff only.

The child's education file is marked with a small dot to indicate a child protection file exists. All staff that may need to consult a child's file should be made aware what the symbol means and to speak to the DSL if they have concerns.

Electronic Child Protection Records are password protected with access strictly controlled in the same way as paper records.

35. MONITORING AND REVIEW

Any safeguarding incident at the School will be followed by a review of the safeguarding procedures within the School and a prompt report to the Governors. In addition, the DSLs will monitor the operation of this policy and its procedures and will produce a termly report to the Governors. Any updates to the policy will be done immediately to produce a dynamic review process; all changes will be highlighted and emailed out to staff on a termly basis. The changes will only be made permanent when the Governors have signed-off the policy. The policy will be updated as necessary to reflect any changes in local or national guidance and legislation and such changes will be notified to staff as appropriate'.

The Governors will undertake an annual review of this policy and how their duties under it have been discharged. The Governors will ensure that any deficiencies or weaknesses in regard to safeguarding arrangements at any time are remedied without delay. Safeguarding will be a standing item for all regular Governing body meetings. Governors will ensure that any complaints, deficiencies or weaknesses relating to safeguarding arrangements are fully considered and remedied in an appropriate and timely manner'.

Useful Links

Local

Northamptonshire Safeguarding Children Partnership (NSCP)

Ground Floor
John Dryden House
8-10 The Lakes
Northampton
NN4 7YD

01604 364036

http://www.lscbnorthamptonshire.org.uk/reporting_concerns_home.html

“Making Children Safer” – A Pocket Guide download at:

<http://www.northamptonshire.gov.uk/mcs>

Thresholds and Pathways document:

<http://www.northamptonshire.gov.uk/en/councilservices/children/protecting-children/Pages/northamptonshire-thresholds-and-pathways.aspx>

Early Help – Request for Services

Contact an Early Help Co-ordinator

www.northamptonshire.gov.uk/mcs

Multi-agency referral form download at:

<http://www.northamptonshire.gov.uk/en/councilservices/children/protecting-children/Pages/northamptonshire-thresholds-and-pathways.aspx>

e-mail multi-agency form to:

MASH@northamptonshire.gcsx.gov.uk

Directory of services for Early Help

<http://families.northamptonshire.gov.uk/directory-search>

Directory of services for children with disabilities

<http://www.northamptonshire.gov.uk/en/councilservices/children/disabled-children/pages/default.aspx>

Education Entitlement Service

Online referral form available at:

<http://www.northamptonshire.gov.uk/en/councilservices/EducationandLearning/Parents/Pages/Education-Entitlement-Service.aspx>

National

National Society for Prevention of Cruelty to Children (NSPCC):

<http://www.nspcc.org.uk/> 0808 800 5000

Childline:

<http://www.childline.org.uk/Pages/Home.aspx> 0800 1111

Child Exploitation and Online Protection (CEOP):<http://ceop.police.uk/>

0870 000 3344

NB: This is dynamic document this is constantly being reviewed and shared with all staff & governors.