

# St George's Safeguarding Policy

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**KEY SCHOOL CONTACT DETAILS**

<p><b>Governors</b></p>	<p><b>Chair of Governors</b> Alistair Mackintosh 07887 552 675 <a href="mailto:amackintosh@stgeorges-ascot.org.uk">amackintosh@stgeorges-ascot.org.uk</a></p> <p><b>Nominated Safeguarding Governor</b> Antonia Felix 0203 321 7453 <a href="mailto:Antonia.Felix@mishcon.com">Antonia.Felix@mishcon.com</a></p>
<p><b>Designated Safeguarding Lead (DSL) &amp; Mental Health Lead</b></p> <p><b>Deputy Designated Safeguarding Leads (DDSL)</b></p>	<p><b>DSL</b> Helen Simpson 01344 629914 <a href="mailto:hsimpson@stgeorges-ascot.org.uk">hsimpson@stgeorges-ascot.org.uk</a></p> <p><b>Deputy DSL</b> Alex Wright 01344 629915 <a href="mailto:awright@stgeorges-ascot.org.uk">awright@stgeorges-ascot.org.uk</a></p> <p><b>Deputy DSL</b> Mollie Magill 01344 629900 <a href="mailto:mmagill@stgeorges-ascot.org.uk">mmagill@stgeorges-ascot.org.uk</a></p>

	<p><b>Deputy DSL</b> Catherine Jones 01344 629900 <a href="mailto:healthcentre@stgerorges-ascot.org.uk">healthcentre@stgerorges-ascot.org.uk</a></p>
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<p><b>Head</b></p>	<p>Elizabeth Hewer 01344 629904 <a href="mailto:head@stgerorges-ascot.org.uk">head@stgerorges-ascot.org.uk</a></p>

#### KEY EXTERNAL CONTACT DETAILS

<p><b>Local Authority Designated Officer</b></p>	<p>0208 8917370 07774 332675 <a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a></p>
<p><b>Three Statutory Safeguarding Partners in RBWM</b></p>	<p><b>Kevin McDaniel</b> - Director of Children's Services, Royal Borough Windsor and Maidenhead <b>Sarah Bellars</b> - Director of Nursing and Quality, East Berkshire Clinical Commissioning Group <b>Nick John Detective Supt</b> - Head of Protecting Vulnerable people, Thames Valley Police</p> <p><a href="#">RBWM Safeguarding Partners</a> <a href="mailto:Safeguarding.Partnership@rbwm.gov.uk">Safeguarding.Partnership@rbwm.gov.uk</a></p>
<p><b>Local Authority Children's Social Services</b></p>	<p><b>Children's Services</b> <b>Early Help and Safeguarding Referral and Assessment Team</b> Royal Borough of Windsor and Maidenhead 01628 683 150</p> <p><b>Out of hour's team</b> Royal Borough of Windsor and Maidenhead 01344 786 543</p> <p><b>Local Safeguarding Children Board (LSCB)</b> Royal Borough of Windsor and Maidenhead 01628 683 234</p>

	<p><a href="mailto:lscb@rbwm.gov.uk">lscb@rbwm.gov.uk</a> <a href="http://www.wamlscb.org">www.wamlscb.org</a></p>
<b>Multi-Agency Safeguarding Hub</b>	<p>01628 683150 <a href="mailto:MASH@RBWM.gov.uk">MASH@RBWM.gov.uk</a></p>
<b>Support and Advice about Extremism</b>	<p><b>Police</b> Emergency: 999 Non emergency number: 101 or 0845 505 505 Anti terrorist hotline: 0800789321</p> <p><b>Local Authority</b> <b>RBWM Prevent Lead: Community Protection and Enforcement</b> <a href="#">RBWM Prevent Strategy</a></p> <p><b>Department for Education</b> Non emergency number: 020 7340 7264 <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a></p>
<b>NSPCC whistleblowing advice line</b>	<p>Weston House, 42 Curtain Road London EC2A 3NH 0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p> <p>Free advice and support for professional concerned about how child protection issues are being handled in their organisation</p> <p><a href="#">NSPCC Whistleblowing advice line</a></p>
<b>Disclosure and Barring Service</b>	<p>PO Box 181, Darlington, DL1 9FA 01325 953795 <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a></p>
<b>National College for Teaching and Leadership</b>	<p>53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH 0207 593 5393 <a href="https://www.gov.uk/government/collections/teacher-misc-onduct">https://www.gov.uk/government/collections/teacher-misc-onduct</a></p>
<b>OFSTED Safeguarding Children</b>	<p>0300 123 4666 (Monday to Friday from 8am to 6pm) <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a></p>

## POLICY STATEMENT

This policy applies to St George's School. This policy is reviewed and updated annually (as a minimum) and is available on the School website.

This policy has regard to the following guidance and advice.

- Keeping Children Safe In Education (September 2023) (*KCSIE*)
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (July 2018)
  - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (Updated April 2021)
  - The Prevent Duty: Departmental advice for schools and childminders (June 2015)
  - The use of social media for on-line radicalisation (July 2015)
- Due to St George's charitable status we follow Charity Commission guidance on charity and trustee duties to safeguard children [Safeguarding and protecting people for charities and trustees](#) (December 2017)
- Windsor and Maidenhead Safeguarding Children Board guidance (ensuring we work in accordance with locally agreed inter-agency procedures)
- Behaviour in Schools: Advice for Headteachers and School Staff (September 2022)
- National Minimum Standards for Boarding Schools (September 2022)

## INTRODUCTION

Child Protection is always a priority at St George's. The Governing Body takes seriously its responsibility under Section 175 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are at risk of or are suffering harm. We all have a duty both to children in need and to children at risk of harm. We recognise that all staff and Governors have a full and active part to play in protecting our pupils from harm, and that the child's welfare is of paramount concern. The School prohibits the use of corporal punishment.

## AIMS

We will update and remedy any deficiencies or weaknesses in the child protection arrangements without delay. The aims of this policy are as follows:

- To support the child's physical and mental health development in ways that will foster security, confidence and resilience. Always acting in the 'best interests' of the child.

- To provide an environment in which young people feel safe, secure, valued and respected, confident and know how to approach adults if they are in difficulties.
- To raise the awareness of all Governors, teaching staff, support staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

**Safeguarding** (as defined in the Joint Inspector's report) is taken to mean 'All agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children's welfare is minimised' and 'where there are concerns about children and young people's welfare, all agencies take all appropriate actions to address those concerns, working to agree local policies and procedures in full partnership with other agencies.' **Staff** covers all adult staff on site, including temporary, supply and support staff and volunteers working with children.

- To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils.
- To develop a structured procedure within the School which will be followed by all members of the school community in cases of suspected abuse.
- To develop effective working relationships with all other agencies involved in safeguarding children.
- To ensure that all adults within our School who have access to children have been checked as to their suitability.
- To provide a framework to underpin the Governing Body's annual review of child protection policy and procedures and the efficiency with which related duties have been discharged.

We use CPOMS software solution to support the monitoring of Safeguarding, wellbeing and pastoral issues relating to safeguarding.

## CONCERNS ABOUT A CHILD

### Supporting children

We recognise the following:

- Children may not feel ready or know how to tell 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 are being threatened.
- That children may be subjected to physical abuse, emotional abuse, sexual abuse or neglect or any combination of these.
- That a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself and find it difficult to develop and maintain a sense of self-worth.
- The need for staff to be able to reassure victims 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 abuse,

sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- Children with special educational needs, disabilities or other vulnerabilities such as sexual orientation or language barriers can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group. For example, communication barriers, being disproportionately impacted by situations without showing any signs, assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- That the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- That children can be particularly vulnerable in a boarding environment. We are alert to pupil relationships and the potential for child on child abuse.
- That in dealing with possible abuse by one or more pupils against another pupil, there is a need to refer such abuse to an external safeguarding agency.
- That research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- That 'it could happen here'.
- Ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Pupils need the ability to confidently report abuse, knowing they can safely express their views and give feedback.

Staff should ask themselves the following:

- Does the child seem 'normal' for her age?
- Does she seem emotionally or socially withdrawn?
- Is she unusually aggressive?
- Has there been a real change in her behaviour?

St George's Ascot will support all pupils by:

- Acting on early signs of abuse, keep clear records and reassess concerns when situations do not improve, sharing information quickly and challenging inaction.
- Providing the contact details for external helplines, the schools Independent Listener and the School Counsellor.
- Encouraging the development of self-esteem and resilience in every aspect of School life including through the curriculum, particularly PSHE.
- Teach pupils about relevant issues through relationships and sex education along with health education.
- Promoting a caring, safe and positive environment within the School.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Children's Services as soon as there is a concern.



- Seek advice from Children's Services.
- Seek advice from the LADO when concerns about staff are raised.
- Providing continuing support to a pupil (about whom there have been concerns) who leaves the School by ensuring that such concerns and School medical records are forwarded under confidential cover to the Head/ DSL at the pupil's new school as a matter of urgency. A photocopy of these records should be kept in a confidential file until the person's 25th birthday

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcome. Safeguarding and promoting the welfare of children is everyone's responsibility.

We differentiate between safeguarding children who have suffered or are likely to suffer significant harm by reporting to Children's Social Care immediately and those who are in need of additional support from one or more agency using local processes including 'Common Assessment Framework' and 'Team Around the Child' (TAC)

The School has arrangements for listening to children and providing early help.

Pupils have a broad range of staff whom they can approach if they want to raise concerns themselves and school staff are also trained to be alert and aware of children who may be in need.

All school staff should be prepared to identify children who may benefit from early help. Providing support as soon as a problem emerges in a child's life. In the first instance discussing early help requirements with the DSL. The DSL will consider the appropriate action to take in accordance with the RBWM Safeguarding Children Board referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an interagency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.

### **Definitions of Safeguarding and Types and Signs of Abuse**

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's physical and mental 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.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation),

domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

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.

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

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

The Department has published advice and guidance on [Preventing and Tackling Bullying, Promoting and supporting mental health and wellbeing in schools and colleges](#)

The [Mental Health and Behaviours in school](#) guidance sets out how we can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing.

Public Health England has produced a range of resources to support schools to promote positive health, wellbeing and resilience among pupils including guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise [Rise Above](#) for links to all materials and lesson plans. The Department has also published, [Every interaction matters](#), a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health.

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

Abuse is a form of maltreatment of a child. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse

- emotional abuse
- sexual abuse; and/or
- Neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

### PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

We will respond immediately and sensitively to the concerns raised.

All staff should

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- Ensure a victim is never made to feel ashamed for making a report. It is important to explain that any relevant law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

### Voice of the child (WTSC July 2018)

Children want and need:

- **Vigilance:** to have adults notice when things are troubling them
- **Understanding and action:** to understand what is happening; to be heard and understood; and to have the understanding acted upon.
- **Stability:** to be able to develop an ongoing stable relationship of trust with those helping
- **Respect:** to be treated with the expectation that they are competent rather than not
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans.
- **Explanations:** to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response.
- **Support:** to be provided with support in their own right as well as a member of their family.
- **Advocacy:** to be provided with advocacy to assist them in putting forward their views.
- **Protection:** to be protected against all forms of abuse and discrimination

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making the record. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead or one of their deputies).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and sexual violence. The School manages this by the DSL clearly outlining the plan of action to the pupil. The pupil has the opportunity to elect another teacher who they may like to support them through the process. The School operates its processes with the best interests of the pupil at the centre of decision making.

Appendix 2 highlights the process of actions where there are concerns about a child.

When specifically responding to reports of sexual violence and sexual harassment any decisions we make are on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. Local authority children's social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. When responding to a report refer to paragraphs 466-469 of KCSIE 2023.

When considering confidentiality and anonymity when staff take a report they should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the designated safeguarding lead (or a deputy), will consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the

starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the DSL (or a deputy) has to balance the victim's wishes against their duty to protect the victim and other children. If the DSL (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

### **Early Help**

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

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Is a young carer;
- Is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement, serious violence and association with organised crime groups;
- Is frequently absent/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child.

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

In the first instance, staff who consider that a pupil may benefit from early help should either complete a 'something's not quite right' form (Appendix 3) and or discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Safeguarding Children Board referral threshold document. The local threshold document includes the process for the local early help assessment and the type and level of early help services to be provided.

### [Multi Agency Threshold Guidance RBWM](#)

As a 'relevant agency', we should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

### **What staff should do if they have concerns about a child**

If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the DSL or complete a 'Something's not quite right' form, a course of action will then be planned. Staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

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

If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

### **Multi Agency Working**

The three safeguarding partners make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children including identifying and responding to their needs.

The School's multi agency safeguarding arrangements are via the Royal Borough Windsor and Maidenhead. A full copy of their local procedures can be found

[RBWM Safeguarding Partnerships](#)

[Royal Borough of Windsor and Maidenhead's Safeguarding Partnership Procedures](#)

The NSPCC has produced guidance to support staff in knowing when it is appropriate to contact the Police.

## [NPCC When to call the police](#)

### **Information Sharing**

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. St Georges have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, it is important that we recognise the importance of information sharing between practitioners and local agencies. We ensure arrangements are in place for sharing information within the school and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

We need to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children.

It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.

The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on St George's and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Governing body ensures relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR.

### **Specific safeguarding arrangements**

#### **Interaction with pupils**

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. They need to treat all pupils with respect and try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint. Staff should avoid taking one pupil on her own in a car where possible. Within the boarding houses, girls should not go into staff flats; each house has an office where girls can be counselled as necessary.

It is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.

### **Communication with pupils**

Staff are advised not to give their personal mobile phone numbers to pupils except in special circumstances, nor should they communicate with them by text message, personal email or social media unless essential. If they need to speak to a pupil by telephone, they should, whenever possible, use one of the School's telephones. The leader on all trips and visits involving an overnight stay should always take a School phone with them, and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit. Boarders are encouraged to give a copy of their personal mobile number to their Housemistress for emergency use. All girls are asked for consent for the School database to hold their mobile number.

Please refer to the Staff Employment Handbook (ICT Acceptable Use Policy for staff) for further details.

### **Supervision of pupils**

Day girls may arrive at School from 7.30 am, and are expected to go home by 7.00 pm. Day pupils are not allowed on site outside these hours without supervision. Arrangements are made to ensure pupils are supervised during after-hours functions, play and concert rehearsals, or other events that bring small groups into School out of hours. Members of the PE Department supervise pupils at both home and away matches. All members of the teaching staff are expected to take their share of break and lunchtime supervisory duties. Staff are on duty in all Boarding houses in the evenings and at weekends. Pupils are able to call on a member of staff at any time if necessary. All boarders are expected to return to their boarding houses by their designated curfew times. Boarders may not go off site without permission from the duty house staff. All pupils are expected to remain on site throughout the School day except when they are on a School trip or have permission to go off site, in which case they must sign out and sign back in on return.

We take a register of all pupils in tutor groups at 08.15 and 13.55 and at the start of every lesson. Parents are responsible for notifying the School if their daughter is absent for any reason. The School will always contact the parent if a child fails to arrive at School without an explanation.

There is a qualified health care professional or first aider on duty 24 hours a day who is available to administer first aid, to deal with any accidents or emergencies, or to help if someone is taken ill. A number of members of the teaching staff and non-teaching staff, who are trained and qualified as first aiders are able to give emergency first aid. The names of first aiders are displayed around the school. First aid boxes are in all potentially high risk areas, as well as in the School Office. The health care professional regularly checks and replenishes the first aid boxes.

Parents are responsible for ensuring that their children travel safely to and from School. Pupils are not supervised by a member of staff when travelling on the School buses; but are expected to behave responsibly. We would always investigate complaints about poor behaviour.



Girls are not allowed to use sports facilities without a qualified member of staff in charge, including gymnastic, athletic or climbing equipment. Girls are expected to follow reasonable instructions given to them by teachers or by qualified leaders in adventurous activities.

We ensure that girls do not have unsupervised access to potentially dangerous areas, such as the science laboratories, the theatre sound box and workroom. Doors to these areas are kept locked at all times when not in use. All flammables are kept securely locked in appropriate storage facilities. Pupils do not have access to the maintenance, catering and caretaking areas of the school. Clear signs are displayed.

All new members of the teaching and pastoral staff receive a thorough induction into the School's expectations of the appropriate levels of pupil supervision. Guidance is given about duties and on areas that should be regularly checked when on duty.

### **Images of children**

At St George's School, we are an open and inclusive community that is very proud of all the achievements of all of our girls in their academic, artistic and sporting endeavours. We celebrate our diversity and give all of our many visitors a warm welcome. We particularly welcome parents to our concerts, plays and sporting events, as well as to more formal occasions during the School year. The School walls are decorated with examples of girls' work, team photographs and photographs of trips and expeditions in which our girls have participated. We make full use of electronic notice boards inside the school to enhance our displays. All new teaching and office staff are given guidance on the school's policy on taking, using and storing images of children. If photos are taken of pupils on personal phones or cameras, these must be uploaded at the earliest opportunity to a school computer and deleted from the mobile device.

Our website is updated regularly, and all parents are sent our regular news bulletin in order to keep them fully abreast with the news of our active community. The images that we use for public displays and communications purposes never identify an individual pupil. We only use images of School activities, such as plays, concerts, sporting fixtures, prize-giving and trips in their proper context. We never use any image that might embarrass or humiliate a pupil. Pupils are always properly supervised when professional photographers visit the School.

Parents who accept a place for their child at this School are invited to agree to the School using anonymous photographs of their child and information relating to her achievements for Promotional purposes, which may be published in the prospectus or on the website, as well as displayed within the premises, and in bulletins sent to the School community. We will only use images of our pupils for the following purposes:

- Internal displays (including clips of moving images) on digital and conventional notice boards within the school premises.
- Communications with the school community (parents, pupils, staff, Governors and alumni) via password-protected sections of the School website.
- Marketing the School both digitally by website, social media, by prospectus, by displays at educational fairs and other marketing functions both inside the

UK and overseas, and by other means.

All pupils are photographed on entering the School and, thereafter, at three yearly intervals, for the purposes of internal identification. Access to these 'passport style' photographs are restricted to academic, pastoral and School Office staff. These images are securely kept in a password protected section of the school's database.

If the press attends an event, we will make every effort to ensure that children whose parents or guardians have refused permission for images of their children to be used are protected. We will always complain to the Press Complaints Commission (PCC) if the media fail to follow the appropriate code of practice for the protection of young people.

Parents are welcome to take photographs of their own children taking part in sporting and other School events. We ask parents not to take photographs of other pupils on their own, without the prior agreement of that child's parents.

Everyone has a right to feel secure and to be treated with respect, particularly the vulnerable. Harassment and bullying will not be tolerated. The School is strongly committed to promoting equal opportunities for all, regardless of race, gender, gender orientation or physical disability.

All girls are encouraged to look after each other, and to report any concerns about the misuse of technology, or any associated worrying issue to a member of staff. The use of cameras on mobile phones is not allowed in washing and changing areas or in lessons and neither should photography be used in a manner that may offend or cause upset. The misuse of cameras in a way that breaches our anti-bullying policy is always taken seriously and may be the subject of disciplinary procedures.

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

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 and follow RBWM local procedures. Advice and support can also be sought from children's social care.

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

Since the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There

have been several occasions nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation. Our School values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. The school applies a procedure with regard to visiting speakers.

We encourage the use of external agencies or speakers to enrich the experiences of our pupils, however we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our pupils. Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to, the School's values and ethos. St George's will therefore assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to pupils are consistent with the ethos of the School and do not marginalise any communities, groups or individuals.
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies.
- Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication

By delivering a broad and balanced curriculum, augmented by the use of external sources where appropriate, we will strive to ensure our pupils recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help pupils develop the critical thinking skills needed to engage in informed debate.

We are also aware that young people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times pupils may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and, where appropriate, dealt with in line with School policy.

Staff at St George's are alert to the fact that whilst extremism and radicalisation are broadly a safeguarding issue there may be some instances where a child or children may be at direct risk of harm or neglect. For example, this could be due to a child displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or staff may be aware of information about a child's family that may equally place a child at risk of harm (these

examples are for illustration and are not definitive or exhaustive). Therefore all adults working at St Georges (including visiting staff, volunteers, contractors, and students on placement) are required to report instances where they believe a child may be at risk of harm or neglect to the DSL, DDSL or Head. As part of wider safeguarding responsibilities St George's staff are alert to:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of School, such as in their homes or community groups, especially where pupils have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images.
- Pupils accessing extremist material online, including through social media.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Other schools, local authorities services, and police reports of issues affecting pupils in other schools or settings.
- Pupils voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equal opportunities policy, views based on, but not exclusive to gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or anti-British views.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and seeks to protect children against the messages of all violent extremism. When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak to the DSL, DDSL's or Head who will follow safeguarding procedures in the Prevent Policy. If the matter is urgent then Thames Valley Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then contact should be via 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264). Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues. Advice and support can also be sought from children's social care through their 'Channel' procedures.

### **What staff should do if they discover an act of Female Genital Mutilation (FGM)**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **What staff should do if a child is absent from education**

Children who are absent from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. It is important that our response to persistently absent pupils and children missing education supports identifying possible abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

Further information and support can be found in [Government Document: Children Missing education](#)

The School's procedures for unauthorised absence/ whereabouts not known and for dealing with children who are absent from education each day are:

- If the child isn't present at morning registration this is recorded as an N in the register.
- The signing-in book is checked by the receptionist.
- The receptionist then checks with period 1 staff to see if the pupil has arrived but not signed in.
- The receptionist phones home to check on the reason for absence and then makes a record in the register.

The School will report to Royal Borough Windsor and Maidenhead a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

**If a pupil goes missing during the school day** the following actions will be taken.

There are various checkpoints throughout the day that would alert staff if a girl was missing. In practice we operate a system of trust and rely on the girls not to abuse our free atmosphere and very open grounds. In nearly every case, the girl is not intentionally missing and is found safe and well on School premises. The School however cannot take this for granted and needs to act quickly and decisively in the case of an absent pupil. All girls have to register twice a day, at 08.15 and at 13.55. In addition boarders are registered at breakfast and supper. All girls must be registered at the start of prep at 17.25 and all boarders, including Sixth Form, must be registered by the duty staff at bed time. Any girl who leaves School during the day signs out on her departure and back in on her return.

If a girl is unaccounted for, the following steps must be taken:

- It should be ascertained, as soon as possible, when the girl was last seen by an adult or by a girl if the latter is more recent. Accuracy is vital at this stage.
- The girl's timetable must be scrutinised to see if she might be having an extra lesson or practise such as Learning Support, Music, Drama, Sport or a house

event.

- A thorough search of the School must be undertaken, starting with contacting health centre and the Housemistress if she is a boarder. If it is believed that the girl has left the premises, if a boarder, the Housemistress should check if the girl's belongings / money are also missing and in day girl cases, the tutor should check if her bag / blazer are missing. Girls' mobile phone numbers are stored on Schoolbase and this number must be rung.
- The Head and the Deputy Head (Pastoral) must be informed and this information is then cascaded down to the Head of Year (daytime) and/or Housemistress, whose combined duty it is to ensure correct procedures are followed. In the absence of the Head / Deputy Head (Pastoral) the duty member of SLT must lead the proceedings. In the evenings, resident members of staff must be informed to ensure that the school telephone is answered promptly in the out of office hours.
- The fire alarm will be rung to encourage the missing pupil to come out of the buildings/ space around school should they be the school site.
- The girl's parents and / or guardian must be contacted. In many instances the girl will have been collected by them but failed to sign out and / or ask the School for permission for an early departure. Care must be taken not to alarm parents before carrying out the preliminary checks.
- Staff handling the situation must meet at quarter-hourly intervals to pool their information. Procedures for locating a missing child should take no longer than one hour, within which time the police must have been informed. They may suggest contacting local hospitals for information.
- A written record of the situation and steps taken must be completed as soon as possible.

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

We promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

We encourage a culture in which **all** concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. This encourages an open and transparent culture; enabling the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

If staff have concerns about another staff member, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made about a member of staff, staff are referred to the procedures regarding managing allegations of abuse against staff (including volunteers, temporary and supply staff) in KCSIE Part 4 - 'Section one: Allegations that may meet the harms threshold' for guidance and full details of the procedures (Paragraph 355-422).

When managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college this is considered an allegation that meets the harms threshold.

This guidance from KCSIE should be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, known as transferable risk.

A “case manager” will lead any investigation. This will be either the Head, or, where the Head is the subject of an allegation, the chair of governors.

‘Low level’ concerns and allegations that do not meet the threshold need to be addressed.

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

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

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

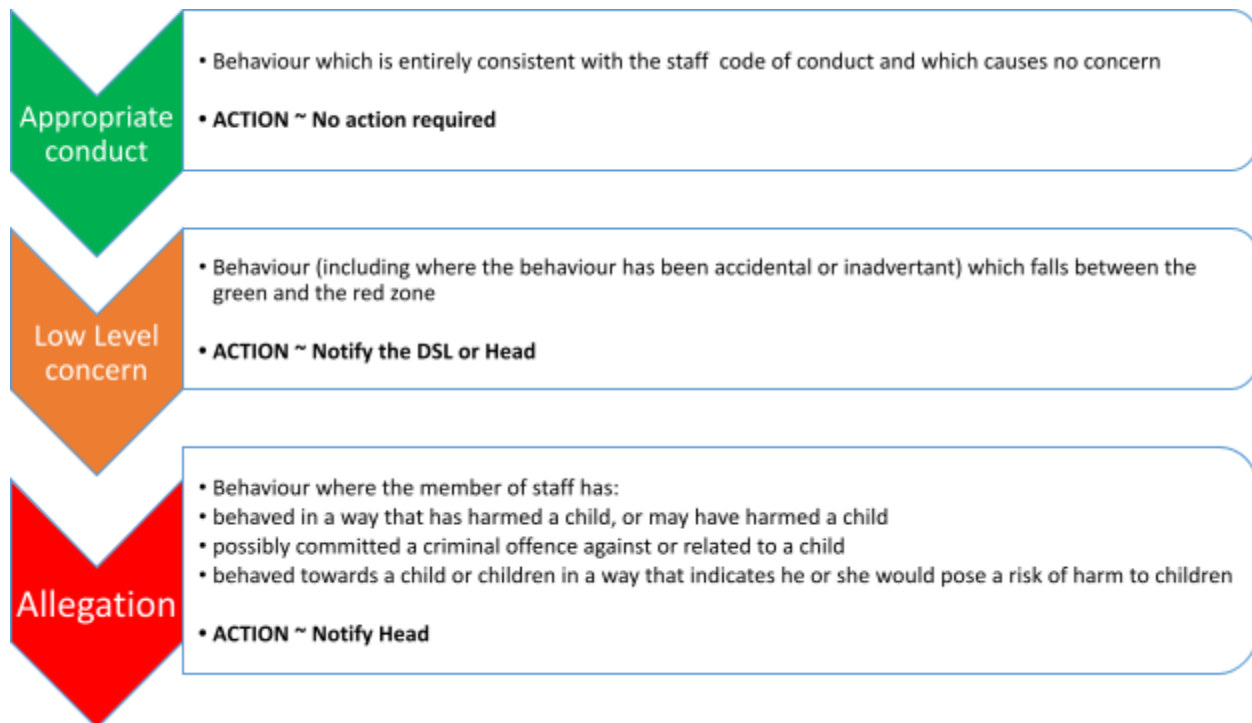
- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Any such concerns, including those which do not meet the harms threshold need to be shared responsibly and with the right person, and recorded and dealt with appropriately.

Full details of the procedure to follow with low level concern can be found in KCSIE Part 4 - ‘Section two: ‘Concerns that do not meet the harm threshold’ (Paragraph 423-445)

All low-level concerns are shared initially with either the DSL or the Head. The DSL will inform the Head of all the low-level concerns, reported to them in a timely fashion according to the nature of each particular low-level concern. The Head is the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the Head may wish to consult with the DSL and take a more collaborative decision making approach.

The flowchart below is a helpful representation of actions to take in relation to safeguarding concerns over another member of staff.



In some circumstances we may have to consider an allegation against an individual not directly employed by St Georges, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. Whilst we are not the employer of supply teachers, we need to ensure allegations are dealt with properly. In no circumstances should we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The Governing body should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out an investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children’s social services. We will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an



allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the governing body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation. When using an agency, schools should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on [Teacher misconduct: referring a case](#)

### **What staff should do if they have concerns about safeguarding practices in the school**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures.

### **Whistleblowing procedures**

A whistleblower is used to describe someone who becomes aware of a serious problem within an organisation and raises that matter so that it can be investigated and corrected. The sorts of problem covered might include:

- Financial fraud, malpractice or other types of corruption
- Attempts to cover up earlier problems
- Abuse or neglect of vulnerable people
- Failure to deliver proper standards of teaching or service
- Damaging conflicts at a senior level
- Bullying, harassment or victimisation in the School and workplace

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice.

As a School we positively encourage staff and members of the School community to raise worries and concerns within the organisation. With this in mind it is important for there to be a clear understanding that at St George's:

- All instances of malpractice (moral, ethical and financial) are taken seriously.
- That confidentiality is to be respected for those staff who raise concerns and that it is possible to raise these concerns outside the line management structure.
- That any concerns about malpractice should normally be raised to the person's line manager or to a member of the Senior Leadership Team.

An effective whistle blowing policy will ensure that concerns are properly raised and expressed in the school. Such a policy will:

- Encourage a culture of openness and accountability.
- Reassure staff that they will not be victimised for expressing their concerns.
- Deter fraud and malpractice.
- Help staff to play their part in the school and feel valued.
- Identify and help to resolve damaging personal conflicts.
- Avoid public criticism and the need to manage a crisis.

### **NSPCC dedicated Whistleblowing helpline**

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Free advice and support for professional concerned about how child protection issues are being handled in their organisation 0800028 0285

Contact details for the NSPCC helpline can also be found on the Key Contacts page at the start of this policy.

### **Confidentiality**

In the past many organisations have strongly discouraged whistle blowing and have felt that the practice was disloyal and underhand. Whistleblowers have suffered for doing what they felt to be the right thing. We believe firmly that all in the School should be able to follow their sense of right and wrong. We believe that through consultation we will continue to develop our procedures and practices to do with confidential reporting.

Staff should discuss with their line manager anything which seems to be unclear. If staff are not sure what to do in any given situation they should ask before taking any action. If a problem is notified, it will always be dealt with seriously. The School is aware that it is never easy to report a concern but hopes that these will be raised at an early stage before it has a chance to become more serious. If it is preferred, reports can be made by an employee who is accompanied by a colleague or friend. The School will support concerned employees and will protect them from reprisals or victimisation. Such reporting will not affect their career or the enjoyment of their job. The School will do anything it can to respect confidentiality if this has been requested. If

attempts are made to discourage, victimise or criticise concerned employees from raising concerns, the School will treat this as a disciplinary offence.

In the vast majority of cases the correct procedure for raising concerns is through the line manager. However in particular circumstances employees should speak to either the Head or Bursar asking them for a confidential meeting.

In any case involving issues concerned with safeguarding and child protection it is vital that the procedure laid down in the Safeguarding Policy is followed. There may be exceptional cases where it might be best to contact either the Chair of Governors or a member of the Governing Body. These instances might include: (1) if the problem involves a very senior member of staff; (2) if a criminal offence has occurred involving the Police. Employees raising concerns need to be aware that such issues will need to be fully investigated. The School needs to treat with absolute fairness both the person raising the concern and also any others who might be involved. Employees raising issues will be informed of, if they request it, the results of any investigation which has taken place and of any proposed action which might result.

However in doing this the School will have to respect the confidentiality of other employees as well. Abuse of the confidential reporting system by maliciously raising unfounded allegations will result in disciplinary action being taken.

There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

## **ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS**

Staff should recognise that children are capable of abusing their peers. Child on child abuse is abuse by one or more pupils against another pupil. This can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports. Staff have an important role to play in preventing child on child abuse and responding to situations where they believe a child may be at risk.

Even if there are no reports in our schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to the DSL.

We must recognise, acknowledge and understand the scale of harassment and abuse in society and avoid downplaying some behaviours related to abuse as this can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. We have a zero-tolerance approach to abuse, and it should never be downplayed or passed off as “banter”, “just having a laugh”, “part of growing up” or “children being children”.

Inappropriate behaviours between peers that are abusive in nature need to be challenged.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, we will ask the victim if they would find it helpful to have a designated trusted adult (for example, their tutor or DSL) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). We will respect and support this choice.

The School recognises that children with special educational needs and disabilities can be more prone to child on child group isolation than other children and will consider extra pastoral support for those children. The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child on child abuse.

Child on Child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; 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 a group and may also include an online element).

Our anti-bullying policy (found in the Behaviour policy) covers procedures to follow in instances of child on child abuse. Most cases of child on child abuse including youth involved sexual imagery will be referred to local agencies. It is an expectation that in the event of a disclosure of child on child abuse that all children involved whether perpetrator or victim, are treated as being 'at risk' and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the relevant pastoral staff to include the DSL, Head of Year, tutor, Housemistress, Special needs coordinator and health centre staff and support from external agencies will be sought, as appropriate.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

The School takes the following steps to minimise the risk of child on child abuse.

- We are a Listening School where pupils are encouraged to express concerns, pertaining to their own safeguarding or that of other students, to any member of staff.
- The PSHE Programme covers aspects of e-safety, anti-bullying, age appropriate safeguarding, and appropriate and respectful relationships and relationships and sex education.
- Staff receive training on e-safety and anti bullying
- We address inappropriate behaviour (even if it appears to be relatively innocuous) to ensure intervention that can help prevent problematic, abusive and/or violent behaviour in the future

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Royal Borough Windsor and Maidenhead on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LCSB, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LCSB and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual

assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered.

As a boarding school there are additional factors to consider with regards to safeguarding set out in the National Minimum Standards. For example, the School should be alert to inappropriate student relationships, initiation/hazing type behaviours and the potential for child on child abuse. The Boarding House staff have also undertaken training on e-safety in order to provide support to the students using the internet outside of school hours and the residential Deputy Head Pastoral has undertaken training to deal with Safeguarding matters which may arise outside of school hours.

Farrer and Co. have created a resource to support schools with addressing child on child abuse.

[Farrer and Co. Addressing Child on Child Abuse](#)

The School's approach to sharing nudes and semi nudes (sexting) is to follow the guidance provided by Gov.UK

[Sharing nudes and semi-nudes: how to respond to an incident \(overview\)](#)

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

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the School.
- time and location of the incident
- any action required to make the area safer

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim 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. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. We should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships

Keeping Children Safe in Education: Part 5 provides further detail in relation to:

- what sexual violence and sexual harassment constitutes,
- important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves, (resources to support staff understanding of HSB can be found at [Harmful sexual behaviour framework](#), [Harmful sexual behaviours toolkit](#))
- related legal responsibilities for schools,
- advice on a whole school approach to preventing child on child sexual violence and sexual harassment, and
- more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

#### **ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS AND VOLUNTEERS)**

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and Windsor and Maidenhead Local Child Safeguarding board arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil;
- Possibly committed a criminal offence against or related to a pupil; or
- Behaved towards a pupil in a way that indicated that they may/ will pose a risk of harm if they were to work regularly or closely with children.

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All concerns about staff are investigated and follow the guidance from Part 4 of KCSIE 'Allegations of abuse made against teachers, and other staff, including supply teachers and volunteers'

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and Local Authority designated officer (LADO).
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of



the LADO and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.

5. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.
6. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
7. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or National Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.
8. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the National College for Teaching and Leadership and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
9. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

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

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the

Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

## **STAFF BEHAVIOUR POLICY / CODE OF CONDUCT**

The School's staff behaviour policy/ code of conduct can be found in the Employment Policies Handbook found in the Staff Resources drive and on Dragonfly. The aim of the staff behaviour policy/ code of conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

## **NEUTRAL NOTIFICATION**

Neutral notification forms are provided for staff who feel their actions or situations they are in require recording for future reference in case of misinterpretation of an incident in the future.

Staff complete the form, pass it to the DSL. The DSL reviews the form, reviews practice in line with the issues raised and the safeguarding policy and then provides feedback to the staff member.

Staff overseeing the 'neutral notification' spreadsheet (Head and DSL) need to look at patterns of staff reports and consider any follow up actions.

## **SAFER RECRUITMENT**

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

In addition, as part of the shortlisting process we carry out an online search as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant

at interview. We inform shortlisted candidates that online searches may be done as part of due diligence checks.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people can be found in St George's Employment Policy Handbook.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the visiting speakers protocol, see Appendix 5.

## **MANAGEMENT OF SAFEGUARDING**

The School's DSL is Helen Simpson who is a member of the senior leadership team.

Alex Wright, Mollie Magill and Catherine Jones are the DDSL's and the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The contact details for the DSL and DDSLs can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy. When a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible but not before the child has been taken off the St George's school roll. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL must ensure safeguarding records are accurately kept. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing and transferred onto CPOMS. Information should be kept confidential and stored securely. Concerns and referrals are kept in separate child protection files for each child. 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.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report

welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL or a Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL's will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements are that the office staff are available to take a message and the DSL is available via her work mobile device to respond to any issues.

Full details of the DSL's role can be found at Annex C of KCSIE. See Appendix 4.

The DSL also oversees the school's arrangements to fulfil other safeguarding responsibilities including teaching children how to stay safe generally and online.

As a school we increasingly work online, it is essential that the children are safeguarded from potentially harmful and inappropriate online material. As such, the governing body ensures appropriate filters and appropriate monitoring systems are in place.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 [found here](#), the Equality Act 2010 [found here](#), and their local multi-agency safeguarding arrangements (see paragraph 82-90 of KCSIE 2023 for further details re. These acts)

## TRAINING

Induction and training are in line with advice from the RBWM LSCB and in accordance with the requirements of statutory guidance.

### Governing body

Governing body ensures that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole

### All Staff

All new staff will be provided with induction training that includes:

- the child protection policy;
- The role and identity of the DSL and DDSL
- the behaviour policy

- the staff behaviour policy or code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who are absent from education;
- a copy of Part one of *KCSIE*
- School leaders and staff who work directly with children will also be required to read *Part one and five of KCSIE*. Staff who do not work directly with children can read either Part one or Annex A (a condensed version of Part one) of this guidance.

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

All staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so. Each time *KCSIE* is updated by the Department for Education, staff will be updated on the changes via inset training. A copy of the link to Part One (or Annex A) will be emailed to all staff.
- Understand key information contained in Part one. The School will ensure staff understanding by requiring staff to complete a test of understanding.
- Receive training in safeguarding and child protection regularly, in line with advice from the LSCB. Training will include online safety and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails and staff meetings.

## DSL

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children and training in the LSCB's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*. See Appendix 5.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL's are trained to the same level as the DSL.

## OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Antonia Felix is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. They are a member of the governing body.

A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The DSL meets termly with the Safeguarding Governor to review ongoing safeguarding cases and practices.

The DSL reports to the board of Governors annually, where the Safeguarding policy is reviewed. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

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

## **THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **Teaching children how to keep safe**

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The School uses 'Lightspeed' filtering system to filter inappropriate material. We also have an internal filtering system whereby different year groups have different access to the internet at different times of the day. All pupils in Year 7 to 11 have a school owned Chromebook computer which has apps which are controlled by the school. Sixth form girls have wider internet access but are still bound by the Lightspeed filtering system. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's E-Safety Policy (within the Behaviour policy) which also includes detail on the use of mobile technology in school (and accessing 4G and 5G technology on school premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

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

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our approach aims to empower us to protect and educate pupils and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Internet safety is an integral part of the School's ICT curriculum and also embedded in PSHE and Relationships and Sex education. Our online safety curriculum is taught inline with Government guidance linked below. Our online safety policy extends to the boarding environment as well as the day school.

### [Teaching online safety in school](#)

The Governing body does all it can to ensure the school limits children's exposure to risks from the school's IT system. The Governing body ensures online safety is a running and interrelated theme whilst devising and implementing our whole school approach to safeguarding and related policies and procedures. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL (and deputies) and any parental engagement.

We do what we can to reasonably limit pupil's exposure to risks from the school's IT system. We have appropriate filtering and monitoring systems in place and regularly review their effectiveness. The SLT and specifically the DSL and other relevant staff have awareness and understanding of the provisions in place for filtering and monitoring online content. We manage them effectively with the support of the It department and know how to escalate concerns when they are identified. The Governing body considers the IT system along with the proportionality of costs versus safeguarding risks.

The Department for Education has published filtering and monitoring standards which set out regulations to meet:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

The Governing body reviews the standards and discusses with the DSL, IT staff and service providers about what needs to be done to support schools to meet this standard.

Additional guidance on filtering and monitoring can be found at: UK Safer Internet Centre: [Filtering and Monitoring Guidance](#)

We have used a tool from South West Grid for Learning to check whether the schools filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content)

The IT and Bursary department take responsibility for ensuring that we have the appropriate level of security protection procedures in place in order to safeguard our systems, staff and learners and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Technology, and risks and harms related to it, evolve, and change rapidly. We carry out an annual review of our approach to online safety, supported by a risk assessment that considers and reflects the risks children face. We have used an online safety self-review tool for schools ~ [Online safety audit and risk assessment](#).

We are aware that the constant improvement in both quantity and quality of new technological devices and platforms increase the need to safeguard children. The School recognises the need to heed advice from the Child Exploitation and Online Protection Agency regarding Internet safety. Every pupil will receive guidance through Computing lessons in conjunction with the PSHE programme and advice for staff and parents will be cascaded in the form of advice letters or sessions organised by the Deputy Head (Pastoral or Academic). The aim with parents is to reinforce the importance of children being safe online and to help them understand what systems we use to filter and monitor online use.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: child to child pressure, commercial advertising and 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 (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Page 158 of KCSIE provides links to online safety resources to support the teaching of online safety and general online education.

We expect all staff and pupils to adhere to our policy for the safe use of the internet. Further details regarding e-safety can be found in our Behaviour Policy section 4. We recognise that as a School we have a duty of care, and understand that we are empowered by law to police e-safety issues 24 hours a day, 7-days a week, and that we may, to such extent as is reasonable, include measures to be taken with a view to regulating the conduct of pupils at a time when they are



not on the premises of the School.

Opportunities are utilised to teach safeguarding, covering relevant issues for schools through Relationships and Sex Education. The PSHE programme follows the Statutory guidance: relationships education relationships and sex education (RSE) and health education.

### [Relationships and sex education \(RSE\) and health education](#)

A list of training resources can be found below.

### [Teaching about relationships, sex and health](#)

St George's ensures online safety is a running and interrelated theme through policies and procedures. This includes online safety being reflected as required in relevant policies and whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL and any parental engagement.

### **Children potentially at greater risk of harm**

#### **Looked after children**

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

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

#### **Children who need a social worker**

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

The DSL holds and uses this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

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

#### **Children requiring mental health support**

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. We have systems in place to identify and support

pupils with mental health problems working with external agencies where appropriate. The document linked below can support this process.

### [Mental Health and Behaviour in School](#)

Public Health England has produced a range of resources to support schools to promote positive health, wellbeing and resilience among young people. See links below.

### [Better Health: Every Mind Matters](#)

## **Elective Home Education**

We will inform the local authority where the pupil resides when they are deleted from our admission register when a child is taken off roll.

When a parent expresses their intention to remove a child from school with a view to educating at home, we inform parents that we will notify the local authority, schools, and work together to coordinate a meeting with parents where possible. Ideally, this is before a final decision has been made, to ensure the parents have considered what is in the best interests of each child.

## **Arrangements for Visiting Speakers**

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

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

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

Visiting Speakers, whilst on the School site, will be supervised by a school employee. They must report to the school reception and will be required to show original current identification documents including a photograph such as a passport or photo card driving licence to the organising member of staff. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

## **Appointing a Guardian**

Every pupil living overseas must have a guardian living in the UK, appointed by the parents to make emergency decisions if the parent cannot be reached and to be responsible for the pupil's arrangements at exeat, half terms and the school holidays, when the school closes. St George's cannot take responsibility for choosing guardians but can send lists of recommended guardianship agencies to the parents.

It is the responsibility of parents living overseas to appoint a Guardian for their child for the entirety of her time at St George's, Ascot, regardless of the girl's age. Parents may decide to operate through a guardianship agency or they might prefer to appoint a guardian independently. We suggest that parents agree the following conditions with the guardian and that both parties sign a guardianship agreement, a copy of which should be given to the School.

The guardian should:

- provide a home at exeat and half term holidays
- care for the child and involve her in family activities
- oversee the child's welfare and progress at School
- be responsible for the child's uniform / clothing
- maintain regular contact with parents
- attend School functions relating to the child
- oversee, in conjunction with the school, any necessary medical treatment
- provide or arrange transport to and from the guardian's home
- liaise with the School to arrange transport to and from airport
- be available to take responsibility for the child in the event of illness, suspension from School, or circumstances that may cause delayed departure from school

### **Use of school premises for non-school activities**

When we hire or rent out the school facilities/premises to organisations or individuals we ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body, under the direct supervision or management of the school, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body therefore seeks assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing body ensures safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Organisations or Individuals using the school premises 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 (for example community groups, sports

associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we follow our safeguarding policies and procedures, including informing the LADO.

### **Safeguarding arrangements ~ School Swimming Pool**

- St George's Staff who work within the swimming pool environment will adhere to the 'Wavepower' safeguarding document provided by 'Swim England'. Wavepower 2020-23: Child safeguarding policy and procedures for clubs.
- St Georges Staff will adhere to the 'Swim England Photography Guidance' found in '**Wavepower 2020-23: Child safeguarding policy and procedures for clubs**'

#### [Wave Power Safeguarding](#)

### **Data Protection**

We have due regard to the relevant data protection principles, which allow us to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Data protection tool kit for guidance is linked below.

#### [Data Protection Tool Kit](#)

## APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All school 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:** 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. 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. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences

Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberating brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Centre of Expertise on Child Sexual Abuse has resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse. [Supporting practice in tackling child sexual abuse](#)

KCSIE (paragraph 466) has a wide range of resources to support schools with managing and teaching about child abuse.

**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.

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

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

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

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

Some additional specific indicators that may be present in CSE are children who:

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

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: A guide for practitioners](#)

### **Child Sexual Exploitation**

CSE is a form of child 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 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. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

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

- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant.

### **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

This link provides detailed guidance to support schools deal with County Lines [County Lines Toolkit](#)



## **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

## **Cybercrime**

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

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

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

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

## **Domestic abuse**

The Domestic Abuse Act 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of

different abusive behaviours, and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, emotional or controlling behaviour. 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, well-being, development, and ability to learn.

Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected”.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. It is important to understand intra familial harms and any necessary support for siblings following any incidents.

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

### **Operation Encompass**

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children’s social care if they are

concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday (term time) on 0204 513 9990 (charged at local rate).

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

**Upskirting: is a form of sexual harassment** Upskirting is a criminal offence.

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

### **Serious Violence**

Staff need to be aware of indicators which may signal that children are at risk from, or are involved in serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self harm or a significant change in well being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

The 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 experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Preventing Youth Violence and gang Involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

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

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be

about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM

[Multi-agency statutory guidance on FGM](#)

To give an example of indications that a girl has already been subjected to FGM:

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

**If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.**

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

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (section 8 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at

[The Right to Choose: Government Guidance on Forced Marriage](#)

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)

Since February 2023 it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- 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. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

**Special Educational Needs and/or Disabilities:** Pupils with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

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

**Lesbian, Gay, Bi or Trans (LGBT):** Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education that we teach at St George's.

### **Children who are absent from education**

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are

aware of their school's unauthorised absence procedures and children missing education procedures. The School's procedure for dealing with children who go missing can be found in this policy section '*What staff should do if a child is absent from education*'. All unexplained absences will be followed up in accordance with this.

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

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

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

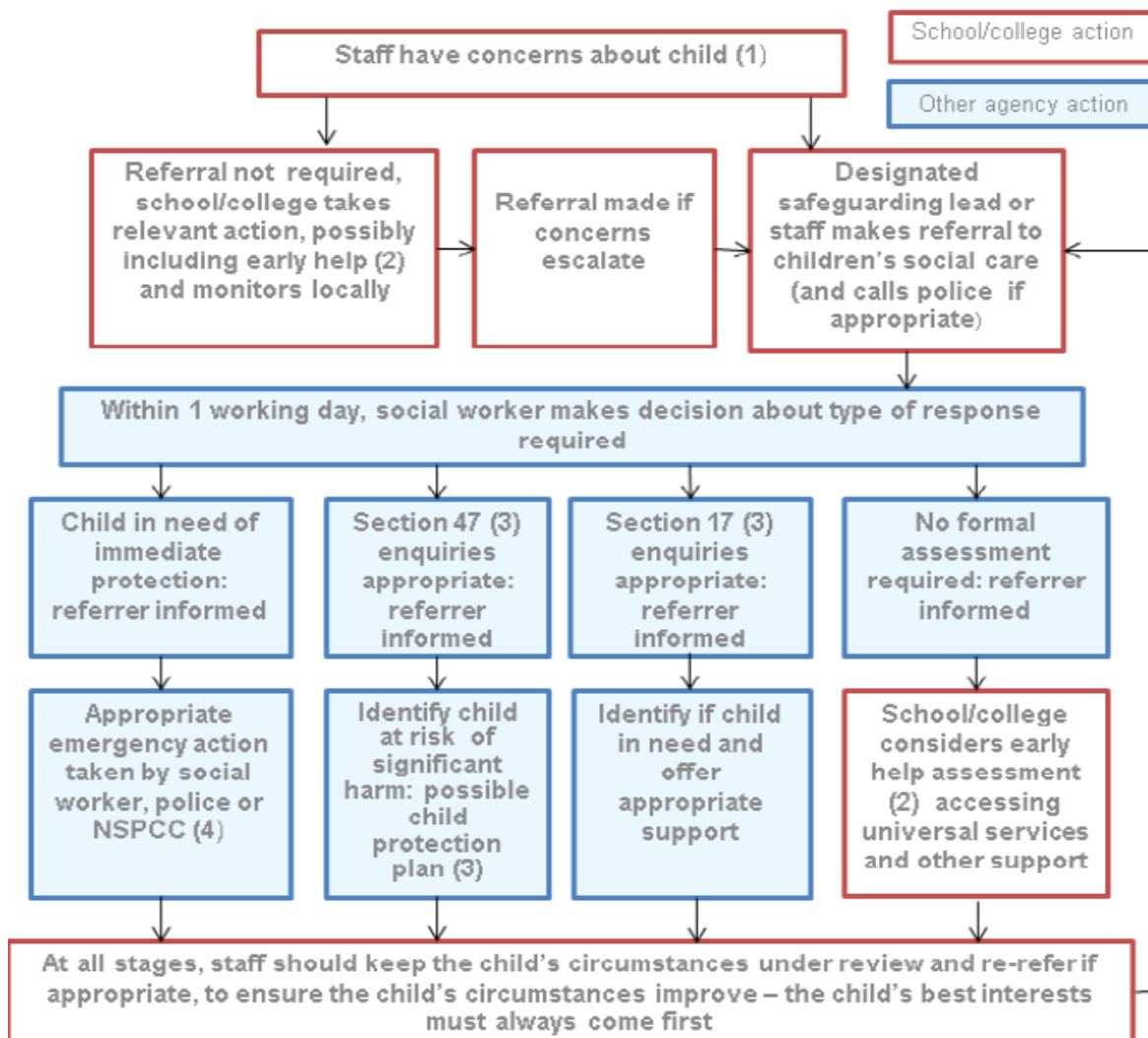
Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

### **Child on child abuse**

Children can abuse other children and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. This can include (but is not 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 and sexual harassment; 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 in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

**APPENDIX 2 - ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD**

**Actions where there are concerns about a child**





**APPENDIX 3 - SOMETHING IS NOT QUITE RIGHT FORM**

**Something Is Not Quite Right Form**

**PLEASE USE THIS FORM WHEN YOU HAVE CONCERNS ABOUT A YOUNG PERSON.  
CONFIDENTIALLY HAND IT COMPLETED TO THE DESIGNATED  
SAFEGUARDING LEAD (HLS)**

This form can also be found via Dragonfly and completed online.

[Online version 'Something's not quite right' form](#)

<b>Name of pupil:</b>
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<b>Age if known:</b>	<b>Year if known:</b>
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<b>Concerns:</b>
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**(Continue on the other side if necessary)**

<b>Your name (Please print this):</b>	<b>Date:</b>
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## **APPENDIX 4 - Annex C Keeping Children Safe in Education September 2023**

### **Role of the designated safeguarding lead**

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead (DSL). The DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The DSL should have the appropriate status and authority within the school to carry out the duties of the post. The role of the DSL carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

### **Deputy designated safeguarding leads**

It is a matter for individual schools as to whether they choose to have one or more deputy designated safeguarding leads (DDSL). Any deputies should be trained to the same standard as the DSL and the role should be explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, this lead responsibility should not be delegated.

### **Availability**

During term time the DSL (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or a deputy) would be expected to be available in person, it is a matter for individual schools, working with the DSL, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and the DSL's to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### **Manage referrals**

The DSL is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

### **Working with others**

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the Head to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO's), and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
  - \* ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
  - \* supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### **Information sharing and managing the child protection file**

The DSL is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

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.

They should ensure the file is only accessed by those who need to see it and where the file or

content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as DSL's and special educational needs co-ordinators are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Raising Awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- ensure the school's child protection policy is reviewed annually (as a minimum) 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 know that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership

### **Training, knowledge and skills**

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL (and any deputies) should also undertake Prevent awareness training. Training should provide DSL's with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- 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

- understand the importance of the role the DSL has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- 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. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSL's, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.

This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support

### **Understanding the views of children**

It is important that all children feel heard and understood. Therefore, DSL's (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to

- protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE 2023, and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

## **APPENDIX 5 - Visiting Speaker protocol**

### **Visiting Speaker Protocol**

Visiting speakers are engaged in a variety of areas to benefit the wider education of all at St George's. Examples include PSHE and the Assembly programmes, Higher Education talks or department based enrichment. It is important that the speakers are engaged with a particular theme in mind, that there is clear communication between St George's and the visiting speaker, and that St George's carries out its duties to safeguard all pupils from radicalisation and violent extremism (under the Prevent Duty 2015).

All staff proposing to bring a speaker to St George's will complete the attached pro forma and submit to SLT for approval. No final booking should be made until approval is gained. Submissions should clearly state the proposed audience of the speaker and the measures in place that ensure pupils safeguarding needs are met (for example, where appropriate, background checks, references taken and approval of content of speeches). SLT will record the visits and monitor the provision.

After approval consider the speaker's travel arrangements, parking and possible publicity and marketing for the event. Ensure you ask the speaker if they are comfortable with any publicity especially if you are considering recording the event.

On arrival visiting Speakers, whilst on the School site, will be supervised by a school employee. They must report to the school reception and attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

The member of staff responsible for the speaker will take appropriate action, including stopping the talk if necessary, should they feel the speaker is promoting extremist views or inequality in any form.

**Visiting Speaker Protocol ~ Completed via Dragonfly**

Request for a guest speaker to be in school

<b>Name of speaker</b>	
<b>Organisation</b>	
<b>Date</b>	
<b>Overview of topic / content</b>	
<b>Audience</b>	

**I understand that the guest speaker needs to follow the St George's Visitors' Policy and remain under staff supervision even in the lecture/workshop**

<b>What control measures have been put in place?</b>  Please state: e.g. Google search of background, previously been in to school, testimonials received, photo ID	
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<b>Name of staff requesting speaker</b>	
<b>Head of Department</b>	
<b>SLT approved</b>	

## **Appendix 6 - Police and Criminal Evidence Act (1984) – Code C**

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding Lead (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If, having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned before questioned about an offence, or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

### **The appropriate adult' means, in the case of a child:**

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
  - a) a police officer;
  - b) employed by the police;
  - c) under the direction or control of the chief officer of a police force; or
  - d) a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the Statutory guidance [PACE code C 2019](#)



## **APPENDIX 7 - National Minimum Standards ~ safeguarding within the boarding environment**

We acknowledge that as a boarding school, there are additional factors that may affect safeguarding, in particular opportunities and vulnerabilities for child on child abuse and inappropriate staff/pupil relationships.

The School has due regard to the safeguarding requirements of the revised National Minimum Standards for Boarding (September 2022) and to the recommendations of the Independent Inquiry into Child Sex Abuse (IICSA) (March 2022).

IICSA noted that sexual abuse can and does occur

- in all types of schools;
- to all ages of children.

And so it recommends that schools must go beyond the acceptance that 'it could happen here' to the belief that 'it probably is happening here'.

The boarding environment is regarded by IICSA as a high risk for grooming and abuse by adults working at the school as well as providing opportunities for child-on-child sex abuse. Day pupils at boarding schools are also judged to be vulnerable to these risks. Overseas boarders may be especially vulnerable not just at school but when staying with their educational guardians.

Specific actions we shall undertake.

- report any allegation of child sexual abuse to the inspectorate as well as to the DBS and TRA;
- ensure that the Head, DSL, and DDSL's are trained to the highest level;
- ensure that RSE for all pupils including those with SEND is as effective as possible; and
- ensure that pre-appointment checks and supervision of volunteers are as effective as possible.

With the changes made to the National Minimum Standards for boarding we will ensure that our policies reflect the interests and needs of boarders;

The following guidelines in relation to boarding, amongst others will be followed:

- The wellbeing of boarders will be a primary concern.
- The risks associated with the potential impact of sexual violence and sexual harassment in the boarding environment will be considered
- Any incidents of sexual harassment and sexual violence within the boarding environment will be recorded as boarding incidents.
- Staff and all boarders should know what to do in an emergency including at night.
- We shall ensure that there are clear arrangements for arrival at and departure from school.
- We shall ensure that boarders know how to raise concerns and staff must know how to respond when this happens.
- Our behaviour policy refers/ covers/ includes behaviour and bullying in boarding

accommodation.

- Any incidents of bullying or misconduct within the boarding environment are recorded as boarding incidents.
- In accordance with our RSE policy we promote good relationships amongst all pupils, including boarders.
- We take appropriate steps to ensure that guardians are suitable and promote the welfare of boarders.
- We do not appoint school staff as educational guardians for boarders.