P1 Child Protection and Safeguarding Policy

Author: Jan Zbigniew Szafranski DSL/Head of Sixth Form
Updated in accordance with KCSIE 2024 in August 2024
Operational from 1/9/24

Policy Review

This policy has been drafted with reference to the Hertfordshire Safeguarding Children Partnership's child protection template policy for schools.

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

The policy was last reviewed in full and agreed upon by the Governing Body in November 2023. Following the publication of Keeping Children Safe in Education 2024, this updated version of the policy will be reviewed in full and agreed upon by the Governing Body at their first full meeting in the Autumn Term 2024.

The DSL update of the policy will be in August 2025, or when changes in legislation and statutory guidance occur: whichever is sooner.

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

Signature (Principal):

Date:

Signature (Chair of Governors):

Date:

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

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

Introduction

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

Safeguarding and promoting welfare are defined as protecting children from maltreatment, preventing impairment of children's health and/or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes (Working Together to Safeguard Children, DfE, 2023, pg.7).

This Child Protection and Safeguarding Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with Keeping Children Safe in Education (DfE,2024), the Purcell School's Child on Child Abuse Policy (also at Appendix 11), which expands on specific information included within this policy regarding child on child abuse, Policy for Handling Allegations made against Staff (also at Appendix 10 of this policy) which details what action should be taken in the event someone has a concern about the conduct of a staff member towards a child; Staff Recruitment Policy, Behaviour and Sanctions Policy, Anti-Bullying Policy, Staff Code of Conduct and ICT Acceptable Use Policy. The full list of documents is listed in Appendix Three.

Staff must be aware of the role of the designated safeguarding lead (DSL), including the identity of the designated safeguarding lead and deputy(ies), and be alert to the safeguarding response to children who go missing from education.

All staff are responsible for ensuring the safety and wellbeing of our students. A key requirement of this policy is that if staff have a concern about the safety or welfare of a child, they must report it without delay to the DSL. If they believe a child to be in immediate danger or think a crime is being committed, they should call the emergency services without delay. The matter should then be promptly reported to the DSL. If a staff member has a concern about the conduct of an adult towards a child (even if it is a low-level concern) or believes an adult may pose a risk of harm to a child, this should be reported to the Principal. See the section below "Responding to abuse or neglect".

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

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

Purpose of a Child Protection Policy

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

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

Hertfordshire Safeguarding Children Partnership Procedures

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

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

Note: Students at Purcell have homes in a number of different Local Authorities (LAs), each of which has its own safeguarding procedures. Before proceeding with a referral or Child Protection Contact it is essential to establish the student's normal place of residence which can be found on SIMS, the School's Management Information System. The appropriate Local Authority can be ascertained by putting the postcode into the Government's website "Report Child Abuse to a local council". Any allegation against a member of staff is referred to Hertfordshire, as are incidents involving full time boarders.

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

Key Contacts

The Principal of the Purcell School is:
Paul Bambrough: **01923 331104**
principal@purcell-school.org

The Nominated Governor for child protection is:
Sophia Coles: 07917627350
Sophia.Coles@farrer.co.uk

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

The Designated Safeguarding Lead & the school's Prevent Lead is:
Jan Zbigniew Szafranski (known internally as Ziggi): 01923 331113

(Emergency: 07388 631432)
z.szafranski@purcell-school.org

The Purcell School's Deputy Designated Safeguarding Leads are:
Deborah Shah (Accompanist) - 01923 331108 (07855 838603) - d.shah@purcell-school.org
Sally-Ann Whitty (Learning Support) – 01923 331150 (07967 044336) -
s.whitty@purcell-school.org
Paul Hoskins (Director of Music) – 01923 331134 - p.hoskins@purcell-school.org
Paul Bambrough (Principal) – 01923 331104 - p.bambrough@purcell-school.org
Thomas Burns (Deputy Principal) – 01923 331141 - t.burns@purcell-school.org
Jane Mitchell (Director of Boarding) – 01923 331116 - j.mitchell@purcell-school.org

The **Local Authority Designated Officer (LADO) can be contacted by email:**
LADO.Referral@hertfordshire.gov.uk and professionals can use this online referral form

Hertfordshire County Council Children's Social Care can be contacted via the **Customer Service Centre** (including SOOHS (Out of Hours Service - Children's Services)) – 0300 123 4043

The **Families First** website contains information for parents, carers and professionals and can be accessed here: https://www.hertfordshire.gov.uk/microsites/families-first/families-first.aspx

Professionals can access support from Families First Coordinators when supporting a family with an Families First Assessment or other support in the Early Help arena.

Prevent

Prevent referrals	-	Prevent Referrals – prevent@herts.police.uk
		Prevent National Referral Form 2024
Parent guidance	-	Online Booklet
Advice line	-	ACT Early | Prevent radicalisation
		0800 011 3764
Channel helpline	-	020 7340 7264
NSPCC Helpline	-	0808 800 5000
		help@NSPCC.org.uk

School Staff and Volunteers, and Contract Workers

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

All school staff will receive appropriate safeguarding training, including online safety, so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse and neglect and of the appropriate procedures to follow. In addition, all staff members will receive safeguarding and child protection updates during in-service training days and through a weekly staff bulletin to provide them with relevant skills and knowledge to safeguard children effectively.

Staff are also encouraged to use the training resources provided through the Educare platform for additional training as required.

Supply staff, contractors and volunteers will be made aware of the safeguarding policies and procedures by the DSL, including the Child Protection and Safeguarding Policy (which includes Part One of KCSiE 2024), Child on Child Abuse Policy and Staff Code of Conduct.

Mission Statement

- Embed a safeguarding culture in the School by establishing and maintaining an ethos and culture where children feel secure, are encouraged to talk, and are listened and responded to when they have a worry or concern.

- Establish and maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and wellbeing of a child.

- Ensure children know that there are adults in the school whom they can approach if they are worried.

- Ensure that children who have additional/unmet needs are supported appropriately. This could include referral to early help services or Child Protection Contact to specialist services if they are a child in need and/or have been / are at risk of being abused and/or neglected.

- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum: see KCSiE (DfE, 2024).

- Include opportunities in the PSHE/RSE curriculum for children to develop the skills they need to recognise and stay safe from abuse.

- Contribute to the five outcomes which are key to children's wellbeing:

  - to be healthy

  - to stay safe

  - to enjoy and achieve

  - to make a positive contribution

  - to achieve economic wellbeing

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

Definitions: Safeguarding and Child Protection

Safeguarding as defined in Keeping Children Safe in Education (2024) means:

- providing help and support to meet the needs of children as soon as problems emerge

- protecting children from maltreatment, whether that is within or outside the home, including online

- preventing impairment of children's mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- taking action to enable all children to have the best outcomes.

Working Together to Safeguard Children (2023) further extends this definition to include:

- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children

- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

All staff at The Purcell School are expected to be familiar with the wide range of policies and procedures we have to keep our children safe and promote their wellbeing at all times.

Child/ren: The legal definition of a child in the UK includes everyone under the age of 18. For the purposes of this and other policies, all students at the School are included in this, regardless of their age, in keeping with other educational establishments.

Early Help: Families First is the term used in Hertfordshire for services that work together to support families who need extra help. These are also known as early help services. Early Help is part of all agencies' 'preventative' safeguarding responsibilities, taking action as soon as possible to tackle difficulties for children and families before they escalate into something that is more difficult to overcome. Hertfordshire's Early Help offer comprises:

- Hertfordshire Safeguarding Children's Partnership's threshold document known as the **Continuum of Need** that supports those working with Hertfordshire's children, young people and families. It is a tool to help identify a 'Level of Need' and the service responses that can be expected. A tool to enable all partners to work together transparently as colleagues. It places the child, young person and family at the centre to find solutions early to prevent difficulties escalating.

- The Continuum of Need model represents a spectrum of needs, visualised through a windscreen. This illustrates how we respond to the needs of children and their families across the four levels of need: Universal, Additional, Intensive and Specialist (Child Protection or Child in Need)

- The purpose is that services work collaboratively and openly with families for interventions and referrals in most instances

- Early Help is Hertfordshire's local offer and relies on children and families sharing concerns identified and the willingness to engage; this means that full consent from children and families is required.

- Please note that due to the nature of the School not all students will be Hertfordshire residents and so the Designated Safeguarding Lead (or deputy) should ensure that the correct LA procedures are followed for non-Herfordshire children.

Families First Assessment (FFA) is Hertfordshire's Early Help assessment tool and is used to identify needs and organise the right services to support a family. With consent, DSLs, along with other professionals, are able to initiate and lead on these. Further information can be found on the [Families First Portal](#).

Child in Need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in Need may be assessed under section 17 of the Children Act 1989 by a social worker. Agencies have a duty to cooperate with Children's Services, and parental consent is required.

Child Protection under section 47 of the Children Act 1989, places a duty on the Local Authority to make enquiries and decide whether to take any action to safeguard or promote the child's welfare when there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. Such enquiries, supported by other organisations and agencies, as appropriate, should be initiated where there are concerns about all forms of abuse and neglect. This includes female genital mutilation (FGM) and other honour-based violence, and extra-familial threats including radicalisation and sexual or criminal exploitation. There may be a need for immediate protection whilst an assessment or enquiries are carried out. Parental consent is not required if this would place the child at further risk of harm.

Significant Harm is the threshold for a Child Protection response. If Children's Services suspect a child has suffered or is likely to suffer significant harm, then they must by law carry out child protection enquiries. Harm is defined in the Children Act 1989 as the ill-treatment of a child or the impairment of their health or development. This can include harm caused by seeing someone else being mistreated, for example by witnessing domestic abuse. The phrase 'significant harm' was introduced by the Children Act 1989. The Act does not define 'significant'. The question of whether or not harm is 'significant' relates to its impact on a child's health or development.

Children Looked After: A child is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or LA approved foster carer.

Kinship Care refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a Kinship Care Strategy to improve kinship carers' financial stability, education, training, and partnership with local authorities and other agencies.

These arrangements can be known as either **family and friends care** or **private fostering**.

- **Family and Friends Carers**: If you're a grandparent, aunt, uncle, brother, sister, or family friend looking after a child who can't be cared for by their birth parents, you're known as a family and friends carer. Sometimes these carers will be given Parental Responsibility for the children through a Child Arrangements or Special Guardianship Order.

- **Private Fostering**: You're a private foster carer if you're not a close relative and you're looking after a child who's under 16 (or under 18 if they're disabled) for more than 28 days in a row.

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

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Exploitation is a risk to children and young people that takes place outside of 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.

The three **safeguarding partners** locally known as Hertfordshire Safeguarding Children's Partnership (**HSCP**) comprises of:

- **Hertfordshire County Council**: represented by the Director of Children's Services.

- **Hertfordshire Constabulary**: represented by the Assistant Chief Constable for Local Policing.

- **Hertfordshire and West Essex Integrated Care Board**: represented by the Director of Nursing & Quality Hertfordshire & West Essex Integrated Care Board.

Safeguarding Partners are identified in Keeping Children Safe in Education 2024 (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). These three partners have the strategic responsibility for setting out safeguarding procedures and arrangements for all organisations and agencies who have functions relating to children, and who are required to work together to safeguard and promote their welfare. These organisations and agencies are named in statutory guidance Working Together to Safeguard Children 2023.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

The Gateway is the 'front door' to Hertfordshire's social care. The Gateway Service receives contacts and referrals (queries via calls or emails) from partner agencies and members of the public for support from Early Help and Children's Social Care. Contacts are received via the Customer Service Centre, where there are current safeguarding concerns that require an immediate response. It provides a single response to all new contacts that require an initial multi-agency approach. Contacts that present as meeting a threshold for immediate response bypass the Gateway and are screened and transferred directly to the Joint Child Protection Investigation Team, area Assessment Teams or 0-25 Teams (statutory services).

The multi-agency Gateway operates to the principle that every family (child/young person and their parent/carer) has the right:

- to be told when a professional is worried about the safety or wellbeing of their child by that professional

- to have their consent obtained when someone wishes to make a request for support on their behalf

- to be front and centre of the plan to keep their child safe and well.

The **Multi Agency Safeguarding Hub (MASH)** is a partnership of Children's Services that comprise Health, Police, and Probation. Advisory support is provided by Independent Domestic Violence Advocates and satellite partners, these agencies work together to identify the need of children and their families and signpost to the appropriate agency or resources where threshold is met.

The main aim of a MASH is to improve the quality of information sharing when making decisions between agencies at the earliest opportunity.

MASH is co-located; within the Gateway there are two pods and one Early Help pod.

Implementation, Monitoring and Review of the Child Protection Policy

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

Statutory Framework

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

- The Children Act 1989

- The Children Act 2004

- Children and Social Work Act 2017

- Education Act 2002 (section 175/157)

- Education (Independent School Standards) Regulations 2014 require Independent Schools to safeguard and promote the welfare of children who are students at the school.

- Hertfordshire Safeguarding Children Partnership Manual

- ISI handbook for the Inspection of Schools - The Regulatory Requirements - April 2024

- Keeping Children Safe in Education (KCSIE) DfE September 2024

- Working Together to Safeguard Children (DfE guidance December 2023)

- The Education (Pupil Information) (England) Regulations 2005

- Counter Terrorism and Security Act 2015 (Section 26) Prevent Duty

- Prevent Duty Guidance (December 2023)

- Disqualification under the Childcare Act 2006 (February 2015)

- *What to do if you're worried if a child is being abused* (March 2015)

- The use of social media for on-line radicalisation (July 2015)

- Mental Health and Behaviour in Schools (March 2015)

- Counselling in Schools – A Blueprint for the future (March 2015)

- Sexual Offences Act (2003)

- Female Genital Mutilation Act 2003 (section 74, Serious Crime Act 2015) and the accompanying statuatory guidance

- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry including taking overseas to force them to marry whether or not the marriage takes place).

- Serious Violence Strategy 2018

- Equality Act 2010 (including the Public Sector Equality Duty)

- Human Rights Act 1998

- Apprenticeships, Skills, Children and Learning Act 2009

- Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

- Information Sharing Advice for Safeguarding Practitioners 2024

KCSiE (DfE 2024) states that governing bodies should ensure that the School contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children (DfE December 2023).

HM Government's 'Working Together to Safeguard Children' (2023) requires all schools in Hertfordshire to follow the procedures for protecting children from abuse which are established by the Hertfordshire Safeguarding Children Partnership. Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe:

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

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

KCSiE (DfE 2024) places the following responsibilities on all schools:-

- Schools should be aware of and follow the procedures established by the Hertfordshire Safeguarding Children Partnership.

- Staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions.

- Schools should have procedures (of which all staff are aware) for handling suspected cases of abuse of students, including procedures to be followed if a member of staff is accused of abuse, or suspected of abuse.

- A Designated Safeguarding Lead should have responsibility for coordinating action within the school and liaising with other agencies.

- Staff with designated responsibility for Child Protection should receive appropriate training every two years.

The School is committed to following the Prevent Duty Guidance 2023, having due regard to the requirement to prevent children from being drawn into terrorism.

In accordance with Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015) staff are aware of their statutory duty to report to the police where they discover either through disclosure by the victim or visual evidence that FGM appears to have been carried out on a girl under 18.

KCSiE (DfE 2024) also states:

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

The role of the Designated Officer, known in Hertfordshire as the **Local Authority Designated Officer (LADO),** is set out in 'Working Together to Safeguard Children' (2023). The LADO works within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child;

- possibly committed a criminal offence against children, or related to a child;

- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

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

advice, guidance and help to determine whether the allegation sits within the scope of the procedures.

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

Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors at The Purcell School and is consistent with national duties outlined in Keeping Children Safe in Education 2024 and local expectations expected within Hertfordshire Safeguarding Children Partnership Procedures Manual. Our Child Protection policy and procedures also apply to extended school and off-site activities.

The Governing Body

Governing bodies and proprietors must ensure that they comply with their duties under legislation. They must also have regard to KCSiE (DfE 2024) and this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times. The Governors acknowledge that safeguarding duties are the responsibility of the entire Governing Body and regularly monitor the effectiveness of the School's child protection responsibilities and arrangements, with safeguarding being part of all meetings of the full Governing Body. Additionally Governing bodies should have a senior board level lead to take leadership responsibility for the school's safeguarding arrangements.

The nominated governor for child protection is:
Sophia Coles: 07917627350
Sophia.Coles@farrer.co.uk

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

In particular the Governing Body must ensure:

- their contribution to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified;

- that there are effective procedures in place to deal with allegations of abuse made by other children;

- that an effective child protection policy is in place, together with a staff code of conduct and that all relevant policies are made available on the School's website;

- ensuring that staff induction is in place with regard to child protection and safeguarding:

- that all staff are clear about their roles and responsibilities;

- that all staff are provided with Part One (or Annex A where appropriate) and Annex B of Keeping Children Safe in Education (DfE Sept 2024);

- that appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material and to review these as appropriate. Additional supportive material is provided in Annex D of KCSiE (DfE 2024). The Governing Body must ensure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training;

- that online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

- that they review the [DfE's filtering and monitoring standards](#), and discuss with IT staff and service providers what needs to be done to support the school in meeting these standards;

- that a Designated Safeguarding Lead and deputy(ies) are appointed as the safeguarding lead and deputies respectively and that their key activities in this area (and protected time for them) are explicit in the job description approved by the Governing Body;

- that an appropriate senior member of staff from the school leadership team is appointed to the role of DSL;

- that the DSL and deputy(ies) undergo formal child protection training every two years, in line with KCSiE and HSCP procedures, and receive regular, at least annual, safeguarding updates via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments, for example;

- that acting in the best interests of children and young people is the priority and that a culture is created in which staff are confident to challenge senior leaders over any safeguarding concerns;

- that staff have the necessary skills, knowledge and understanding to keep safe children who are looked after by a local authority;

- that children are taught about how to keep themselves safe, including online safety;

- that a member of the Governing Body (usually the Chair) is nominated to be responsible in the event of an allegation of abuse being made against the Principal;

- that safeguarding policies and procedures are reviewed annually and that information is provided to the local authority concerning them and concerning how the above duties have been discharged;

- that Safeguarding is a standing item on all agendas of the Governing Body;

- that the minutes of the annual review of safeguarding (Summer meeting conducted by the DSL and the Governor responsible for Child Protection) demonstrate the appropriate depth and breadth of the review;

- that any referrals to the Disclosure and Barring service, Teaching Regulation Authority, Charity Commission or any other statutory authority are made when required.

All governors and trustees should receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenges 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 school

approach to safeguarding. Their training will be regularly updated so that their training cycle is in line with that of other school staff. All governors will read Keeping Children Safe in Education in its entirety, and review compliance of this task at least annually.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. According to the Equality Act, schools and colleges must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges.

The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

Information sharing

As part of meeting a child's needs, it is important for governing bodies and proprietors to recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the processes and principles for sharing information within the school or college and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

School staff should 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, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

It is important that the governing body is aware that, among other obligations, the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Governing bodies and proprietors should ensure 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.

This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'

- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. 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, and

- for schools, not providing students' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.

The Data Protection Act 2018 and UK GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. The Purcell School recognises that timely information sharing is essential for effective safeguarding. 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. Staff should never promise a child that they will not tell anyone about a safeguarding disclosure, as this may not be in the child's best interests.

The following principles apply to The Purcell School's sharing of information:

- Timely information sharing is essential to effective safeguarding;

- The Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe;

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if:

  - it is not possible to gain consent;

  - it cannot be reasonably expected that a practitioner gains consent;

  - or if to gain consent would place a child at risk.

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;

- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

  - Even if a victim doesn't consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies.

  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

- The DSL should consider the following points:

  - 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 where the child resides.

  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the Police remains.

- Regarding anonymity, all staff will:

  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.

  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.

  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

- Confidentiality is also addressed in this policy with respect to record keeping and allegations of abuse against staff.

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

The Principal

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

- understand the role of the DSL and approve his or her job description and ensure that s/he has the necessary resources – including protected time, funding, training and resources – to discharge his or her responsibilities and provide advice and support to other staff on welfare and child protection matters;

- receive Level 1 Safeguarding training every three years

- ensure that matters of child protection and safeguarding are regularly discussed by the DSL and the Senior Leadership team;

- brief Governors on a termly basis and more frequently if there are particular issues;

- in the circumstances of an allegation against a member of staff (or a volunteer) be the person to whom staff refer the matter;

- make decisions regarding all low-level concerns, collaborating with the DSL as appropriate;

- make a report to the DBS if any employee, volunteer or contract worker resigns, withdraws from voluntary activity or ceases to be employed by the School because s/he is considered unsuitable to work with children; the Principal will make the report within one month; no exceptions will be made and settlement agreements will not apply in this connection;

- ensure that if a teacher resigns or is dismissed as a result of 'unacceptable professional conduct' or 'conduct which may bring the teaching profession into disrepute' or in consequence of a conviction, that it considers making a report to the Teaching Regulation Authority.

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, the Principal 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 Gov.uk. Consideration should also be made as to whether any other external referrals should be made, including to the DBS.

The Designated Safeguarding Lead (DSL)

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

Jan Zbigniew Szafranski (known internally as Ziggi): 01923 331113
(Emergency: 07388 631432)
 z.szafranski@purcell-school.org

Mr Jan Zbigniew Szafranski is a member of the Senior Leadership Team. During term time the DSL and/or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns and the DSL (or a deputy) can be contacted out of hours/out of term. If the DSL and all deputies were to be unavailable, staff should speak to a member of SLT or to Herts Children's Safeguarding Partnership. During term time, whilst students are on site, at least one (D)DSL is available at all times to manage emergency situations.

The Purcell School's Deputy Designated Safeguarding Leads are:
Deborah Shah (Accompanist) - 01923 331108 (07855 838603) - d.shah@purcell-school.org
Sally-Ann Whitty (Learning Support) – 01923 331150 (07967 044336) -
s.whitty@purcell-school.org
Paul Hoskins (Director of Music) – 01923 331134 - p.hoskins@purcell-school.org
Paul Bambrough (Principal) – 01923 331105 - p.bambrough@purcell-school.org
Thomas Burns (Deputy Principal) – 01923 331141 - t.burns@purcell-school.org
Jane Mitchell (Director of Boarding) – 01923 331116 - j.mitchell@purcell-school.org

See Appendix 2 for further contact details including other agencies.

The DSL takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

The broad areas of responsibility for the DSL are:

- Managing Child Protection Contact Referrals and Cases

- Providing advice and support to other staff on child welfare and child protection matters

- Contacting the Child Protection Consultation Hub when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention

- Completing Child Protection Contact Referrals for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person, Police where a crime may have been committed and to the Channel programme where there is a radicalisation concern

- Liaising with the Principal to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a Child Protection Contact Referral by liaising with relevant agencies

- Support staff who make Child Protection Contact Referrals and other service referrals

- Share information with appropriate staff in relation to a child's looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.

- Ensure they have details of the CLA's social worker and the name of the virtual school Head Teacher in the LA that looks after the child or those currently working with a social worker.

- Monitor the effectiveness of the school's policies and procedures around online safety and intervene where necessary to ensure the safety and wellbeing of all students.

- Understand the filtering and monitoring systems and processes in place and ensure their suitability / effectiveness.

Training

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

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

- Have a working knowledge of how Hertfordshire conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so. It is important that the DSL is able to share information and/or take part in statutory processes that involve reviewing and analysing of safeguarding practice and policies. This can include meetings held by Hertfordshire Safeguarding Children's Partnership in response to significant safeguarding incidences,

child death and/or where a safeguarding practice review is required to determine learning and practice analysis.

- Ensure each member of staff has access to and understands the school's child protection and safeguarding policy and procedures, especially new and part time staff who join the school staff.

- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.

- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college

- Understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children

- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes

- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers

- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online

- Have a good understanding of behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children

- Have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer or associated adults where necessary

- Assist the Principal to review and respond to low-level concerns that may arise regarding staff

- Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners (Full details in Chapter One of Working Together to Safeguard Children)

- Be able to keep detailed, accurate, secure written records of concerns Child Protection Contact Referrals alongside referrals to other agencies

- Obtain access to resources and attend any relevant or refresher training courses.

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

Raising Awareness

The Designated Safeguarding Lead should:

- Ensure the school's policies are known, understood and used appropriately by all staff, including part time, contractors, volunteers and supply staff, especially new and part-time staff.

- Work with the governing body to ensure that the school's child protection and safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.

- Ensure the child protection and safeguarding policy is available publicly and that parents are aware that advice regarding early help and child protection concerns could be sought from the Consultation Hub and that Child Protection Contact Referrals about suspected abuse or neglect may be made.

- Ensure parents are aware of the school's statutory role regarding safeguarding of children.

- Link with Hertfordshire Safeguarding Children's Partnership (HSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership team as appropriate. The DSL (and/or a deputy) should have details of the child's social worker and the name of any virtual school's head in the authority that looks after the child. This information will be recorded on MyConcern where appropriate.

- Ensure that when children leave the School their child protection file is passed on to any new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt. The file should not be sent until the child is physically attending the new school.

- In addition, the DSL should also consider whether it would be appropriate to share any information with the new school or college in advance of the child leaving to allow for support to be in place for when the child arrives. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives.

- Obtain proof that the new school has received the safeguarding file for any child transferring and then destroy any information held on the child unless the case is currently open and in line with data protection guidelines.

- Share any appropriate information provided regarding child protection and/or safeguarding concerns related to new students that has been received by the School from their previous institution with key staff as required.

- Ensure that safeguarding policies and procedures are reviewed annually and that information is provided to the local authority about them and about how the above duties have been discharged.

- Take responsibility for the welfare and progress of children in the care of a local authority.

School Staff

Staff are responsible for:

- being aware of the wide range of school policies and procedures we have to keep our students safe and promote their wellbeing at all times including, but not limited to:

  - This policy on Child Protection and Safeguarding

  - Staff Code of Conduct

  - Child on Child Abuse Policy

  - Policy for Handling Allegations made against Staff

  - The role and identity of the Designated Safeguarding Lead (DSL) and deputy(ies)

  - Behaviour and Sanctions Policy

  - Acceptable Use of ICT and Online Safety Policies

- reading 'Keeping Children Safe in Education' (2024) Part One (or Annex A where appropriate), Annex B, and any subsequent updates;

- reading and following the guidance set out in 'Guidance for safer working practices for those working with children and young people in an education setting' (May 2019);

- attending training at the start of each academic year and at other specified times;

- reporting any concerns immediately, following the procedures laid out in the policy, being alert to the signs of abuse, bullying or children at risk of radicalisation;

- understanding the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- understanding the fact that children can be at risk of harm inside and outside of their home, at school and online (this is referred to as extra familial harm or contextual safeguarding)

- understanding the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children

- knowing what to look for to identify children who need help or protection

- monitoring student absences and addressing concerns about irregular attendance in line with the School's safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods;

- working in a professional manner and following the guidance laid out in the Purcell Staff Code of Conduct;

- following the correct staff recruitment procedures as set out in the Staff Recruitment policy;

- being aware of their statutory duties under Section 5B of the Female Genital Mutilation Act 2003 (as inserted in Section 74 of the Serious Crime Act 2015) – these place a statutory duty upon teachers along with social workers and healthcare professionals to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18; those failing to report such cases will face disciplinary sanctions;

- supporting the School's curriculum and pastoral systems and helping to ensure that students relate well to each other and feel safe and comfortable within the School;

- reporting all concerns about staff, contract workers, or volunteers to the Principal (or to the Chair of Governors should the concern relate to the Principal), including low-level concerns (see below).

Parents and Guardians

Parents often receive information from their child about the welfare of other children in school. Parents with concerns about Child Protection issues should contact the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead. Parents with concerns about a member of staff should contact the Principal; concerns about the Principal should be referred to the Chair of Governors (details in Parent Handbook)

Students

All students should:

- be aware of the School's provision for Child Protection and reporting concerns, as outlined in the Student Handbook;

- inform a trusted person within the School if they have any concerns;

- be confident in their understanding that it is always right to tell;

- be aware of the School's security and visitor policy (details in Student Handbook).

Training and specific risk areas

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

Records are kept of all training.

Induction

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

- familiarity with this policy and in particular:

  - what to do if they have a concern about the safety or wellbeing of a child;

○ what to do if they have a concern about the behaviour of an adult towards a child (including low level concerns)

- the identity and function of the Designated Safeguarding Lead and deputy(ies);

- the staff guidance on professional conduct (Code of Conduct contained in the Staff Handbook);

- procedures to be followed in the case of a disclosure;

- Part 1 (or Annex A if appropriate) and Annex B of 'Keeping Children Safe in Education' (DfE,2024), which all are required to read (link in this policy and the staff handbook, as well as on MyConcern);

- 'Guidance for safer working practices for those working with children and young people in an education setting' (May 2019) (link in this policy and the Staff Handbook):

- The School Behaviour and Sanctions Policy (Staff handbook);

- The safeguarding response to children who go missing from education;

- ICT Acceptable Use Policy (Staff).

Access to copies of these policies and KCSIE 2024 (DfE) Part 1 (and Annex A where appropriate) as well as Annex B is provided to staff at induction either via the Staff Handbook or through MyConcern.

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

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

- Confirmation that Child Protection and Prevent training has taken place and that there are no outstanding queries,

- The Staff Handbook,

- Health and Safety,

- Visitor and Site security,

- Whistleblowing policy.

Further Safeguarding Children Training

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

Students are informed of Child Protection matters through –

- Student handbooks

- Tutorials

- The PSHEE curriculum

- Notice-boards in school and boarding-houses

- School assemblies

- Student Leader training

One-to-one Teaching

As a specialist music school, a considerable amount of teaching is delivered in one-to-one situations. The following precautions are observed in line with Guidance for **safer working practice** for those working with children and young people in education settings - May 2019 (See Appendix 7). Students are made aware of how one-to-one teaching should be conducted and what they can expect (including in relation to physical touch) and are encouraged to raise any concerns they may have in this regard with the DSL.

- All new instrumental staff have an individual training session with the DSL on their first day prior to undertaking any teaching

- In addition to the required training and policies for all staff, Instrumental Staff are provided with the School's Instrumental Teachers Handbook which outlines in detail the School's child protection and safeguarding procedures and expectations, and gives valuable advice and guidance on conduct. The Handbook is updated annually to ensure it remains relevant and in line with the latest KCSiE.

- Another member of staff is in reasonably close proximity within the building whilst one-to-one teaching takes place.

- Lessons take place within normal working hours or, if out of hours, the Houseparent and SLT are aware.

- Instrumental staff are not permitted to give lessons away from the school premises when working for the school. If families make requests to the teacher for continued tuition during school holidays, the teacher is required to seek permission from the School which will then contact the family to ensure they have put satisfactory safeguards in place.

- The nature of one-to-one tuition often requires students and teachers to work in small spaces in a variety of locations around the site. The School mitigates this risk by ensuring that the interior of all practice and teaching rooms is visible from either the corridor, or from outside (or both) by having large windows and door windows. Instrumental lessons are only timetabled in practice rooms in the New Music Block (where the HoD's office is located and other academic teaching staff are based) and the main building (where multiple other adults and SLT are based) to ensure that other staff are always within sight/call.

- The issue of physical touch in instrumental teaching is a controversial area in which practice varies significantly based on the specific instrument, the immediate needs of the

student, and the cultural background of the teacher. The School's policy (stated in the Instrumental Staff Handbook) is that physical touch is not prohibited but should be avoided. Where it is deemed necessary, permission should be sought and an explanation given. Any physical touch must be purposeful and the teacher should withdraw from the student's personal space immediately after the demonstration. Teachers are advised to "read" the non-verbal language of the student which sometimes might suggest they are uncomfortable even having given verbal permission.

- Staff are advised to take precautions to avoid placing themselves at risk of false allegation

- Staff should report without delay if a child has become distressed or angry, or if they have any concerns whatsoever about the child's wellbeing.

- The working relationship between Instrumental Staff and their students is monitored closely by Instrumental Heads of Department (i.e. Head of Keyboard; Head of Strings; Head of Woodwind etc.). The HoD has responsibility for the musical progress and well-being of the students in their department. They maintain regular contact with their students and will alert the Principal to any concerns if they become aware of them.

- All instrumental staff are recruited through an open, competitive recruitment process according to strict Safer Recruitment practice. All applicants are required to teach an observed lesson and attend a formal interview at which their knowledge and instincts for good safeguarding practice is explored.

- The School will not allow Instrumental Teachers to nominate deputies where they anticipate a period of absence (for example, if the teacher is due to be away on tour). In these circumstances, the recruitment process will be conducted in full.

School Protocol for Visiting Speakers and Visiting Musicians Giving Masterclasses

- All requests for outside speakers must firstly be discussed with SLT.

- The school will undertake a risk assessment before agreeing to a visiting speaker/musician attending the school. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant. The School may also conduct research on the visiting speaker/musician and / or their organisation, as appropriate. The School will not use a visiting speaker/musician where any link is found to extremism, such as extremist groups and movements.

- The School will obtain an outline of what the speaker intends to cover in advance of the visiting speaker's visit. In some cases, the school may also request a copy of the visiting speaker's presentation and / or footage in advance of the session to ensure it is appropriate to the age and maturity of the students to be in attendance and does not undermine British values or the ethos and values of the school.

- A member of school staff will be present during the visit / talk, who will monitor what is being said to ensure that it aligns with the values and ethos of the school and British values. In the unlikely event that the talk / presentation does not meet this requirement, visiting speakers will be informed that school staff have the right and responsibility to interrupt and / or stop a presentation. The member of staff will report this to SLT as soon as reasonably practicable after the talk / visit.

- Visiting speakers/musicians will be supervised by a school employee whilst present at the school. At no point will a visiting speaker/musician be left unsupervised in school whilst students are present.

- On arrival at the School, visiting speakers/musicians will be required to show an original current identification document including a photograph such as a passport or photo card driving licence and will be asked to sign the visitors' book.

- The visiting speaker/musician will be issued with a visitors' badge which they must wear at all times whilst on school site.

- The School will keep a formal register of visiting speakers/musicians. Any information gathered will be kept in accordance with the School's Data Protection Policy.

Safeguarding Against Playing-Related Injuries

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

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

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

Musical Performance, Rehearsal and Inter-Year Working

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

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

During the first term of a new academic year, the School devotes a significant amount of assembly, tutorial and house time to matters of respect, tolerance, kindness, understanding etc. and how best to live and work together productively and happily. This focus sets the expectation and is reinforced by the teamwork necessary for successful music making. All staff working with these mixed groups of students are made aware of potential vulnerabilities of the students through the Monitored Students list and communication with the DSL and his deputies.

When to Be Concerned

Knowing what to look for is vital for the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect (see Appendix 1), understanding that children can be at risk of harm inside and outside of the School, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

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

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

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

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

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

Options Will Then Include:

- managing any support for the child internally via the school's own pastoral support processes;

- completing a Families First Assessment or making a request for early help support.

- a Child Protection Contact Referral for statutory services, for example as the child might be in need of services, or suffering or likely to suffer significant harm from abuse or neglect.

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

trends. This feeds directly into the Safeguarding Team meetings and informs individual safety and care plans.

Extra Familial Harm (formerly Contextual Safeguarding)

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

A Child-centred and Coordinated Approach to Safeguarding:

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

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

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

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

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

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

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

- Children with a disability and/or specific additional needs;

- Children with special educational needs (whether or not they have a statutory Education, Health and Care Plan);

- Children with a mental health need;

- Children who are acting as a young carer;

- Children who are showing signs of being drawn into in antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

- Children who are frequently missing/go missing from care or home;

- Children who are at risk of modern slavery, trafficking or exploitation;

- Children whose family circumstances present challenges, such as substance abuse, adult mental health or learning disability, domestic violence

- Children who are misusing drugs or alcohol themselves;

- Children who have returned home to their family from care;

- Children who are at risk of being radicalised or exploited;

- Children who have a family member in prison, or are affected by parental offending;

- Children who are privately fostered;

- Children who have returned home to their family from care;

- Children who are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced marriage;

- Children who are persistently absent from education, including persistent absences for part of the school day;

- Children who are showing early signs of abuse and/or neglect.

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

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

Children with Special Educational Needs and Disabilities:

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

This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration;

- Assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs;

- Communication barriers and difficulties

- Reluctance to challenge carers (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)

- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.

- A disabled child's understanding of abuse.

- Lack of choice / participation

- Isolation – children with SEND can be more prone to peer group isolation

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

Child on Child Abuse (formerly Peer on Peer Abuse)

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

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

- Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or

- whether the perpetrator has repeatedly tried to harm one or more other children; or

- Whether there are concerns about the intention of the alleged perpetrator.

All staff should be aware that children can abuse other children and that it can happen both inside and outside of school and online. All staff should be clear as to the School's policies and procedures with regard to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in the School 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 (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Furthermore they should recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child on child abuse is unacceptable and will be taken seriously.

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This 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 children (sometimes known as 'teenage relationship abuse');

- 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 stand-alone 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 nude and semi-nude 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 them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

- 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).

Consent

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

It is important to know that:

- a child under the age of 13 can never consent to any sexual activity;

- the age of consent is 16; and

- sexual intercourse without consent is rape

The sexual abuse of children by other children is a specific safeguarding issue in education: this can include sexual violence, sexual harassment and the sharing of nude or semi-nude images (see Part 5 of KCSIE 2024). The 2021 Ofsted review of sexual abuse in schools revealed how prevalent sexual harassment and online sexual abuse are for children and young people and their reluctance to report incidents of abuse for a wide variety of reasons. The Review recommends that all schools act as though sexual harassment and online sexual abuse are happening, even when there are no

specific reports. The School maintains a zero-tolerance policy regarding all forms of sexual harassment and sexual abuse and staff must be aware of potential risks and vulnerabilities. The Child on Child Abuse Policy gives more detail of specific forms of child-on-child abuse as well as guidance on how to respond to concerns or allegations of child-on-child abuse.

Staff at The Purcell School use The Sexual Behaviours Traffic Light Tool by the Brook Advisory Service to help assess and respond appropriately to sexualised behaviour. The traffic light tool can be found at CPD: Brook Sexual Behaviours Traffic Light Tool (RSE) Course

Guidance on responding to and managing sexting incidents can be found at: Child protection - Hertfordshire Grid for Learning

Child-on-child sexual violence and sexual harassment

When responding to concerns relating to child on child sexual violence or harassment, the School will follow the guidance outlined in Part Five of KCSiE (DfE, 2024). The School recognises that sexual violence and sexual abuse can happen anywhere, and all staff must maintain an attitude of 'it could happen here.' The School further recognises that 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 and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

All victims of sexual violence or sexual harassment will be reassured 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. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report. Abuse that occurs online or outside of the School will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies and procedures.

The School recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to students that avoids alarming or distressing them. The School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident, and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

The DSL and his deputies are likely to have a complete safeguarding picture and will be the most appropriate person(s) to advise on the initial response. The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved or impacted in line with part five of KCSiE (DfE, 2024) and HSCP procedures. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.

Reports will initially be managed internally by the School and where necessary will be referred to Children's Services and/or the police. Important considerations which may influence this decision include:

- the wishes of the victim in terms of how they want to proceed;

- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed;

- the ages of the children involved;

- the developmental stages of the children involved;

- any power imbalance between the children;

- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature;

- that sexual violence and sexual harassment can take place within intimate personal relationships between children;

- understanding intra familial harms and any necessary support for siblings following incidents;

- whether there are any ongoing risks to the victim, other children, adult students, or school/ college staff;

- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The School will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Services and/or the police) to ensure a consistent approach is taken.

Due to the nature of the School, students may make a disclosure to any member of staff. Should a member of staff receive a report of sexual violence or sexual harassment, they should:

- Not promise confidentiality and share the report only with those necessary to progress it. They must explain this to the victim;

- Recognise that the child has placed them in a position of trust and be supportive and respectful;

- Listen, be non-judgemental, be clear about boundaries and how the report will be progressed, and do not ask leading questions, only prompting the child where necessary with open questions;

- Record without being distracted by note taking;

- Record only facts as presented by child;

- Where the report contains an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice – not viewing or forwarding illegal images;

- If possible managing reports with two staff present (one being the DSL or a deputy);

- Informing the DSL or a deputy as soon as practically possible.

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

- Provides a developmentally appropriate PSHE and RSE curriculum which develops students' understanding of acceptable behaviour and keeping themselves safe. Examples include recognising bullying and abuse in all its forms, including prejudice-based bullying both in person and online/via text, exploitation and trafficking), having the skills and strategies to manage being targeted or witnessing others being targeted, recognising peer pressure and having the strategies to manage it, the role peers can play in supporting each other.

- Embeds RSE within the context of a wide ranging and high quality PSHE/Pastoral Curriculum both within the formal classroom and beyond. The Sixth Form will be provided with significant opportunities for PSHE education through assemblies, the Sixth Form Personal Development Programme, a series of focussed sessions addressing consent, sexual harassment and sexual violence and engagement with external experts;

- Provides additional support to SEN and EAL students where necessary such that they are able to understand the concepts within their own contexts;

- Educates students about consent;

- Presents assemblies which emphasise a respect agenda and acts of kindness.

- Reinforces the respect agenda in the boarding house community.

- Has systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued – see the Anti-Bullying and Child on Child Abuse Policies for details and advice in the Student Handbook. Students have a dedicated tutor and Houseparent but are encouraged to speak to any trusted member of staff.

- Requires all staff to challenge the attitudes that underlie such abuse (both inside and outside the classroom);

- Ensures victims, perpetrators and any other child affected by child on child abuse will be supported -see the Anti-Bullying and Child on Child Abuse Policies for details. The Hertfordshire Safety and Support Plan is used where appropriate.

- Develops robust risk assessments where appropriate (e.g. Using the Hertfordshire Risk Assessment Management Plan and Safety and Support Plan tools).

- Has relevant policies in place (Anti-Bullying, Behaviour and Sanctions, Child on Child Abuse)

- Ensures that only those practice rooms which are located within the vicinity of a member of staff/House and have high levels of public visibility are made available for student practice during the evening and weekends, as the number and placement of these rooms, necessary in any specialist musical environment, has the potential to be exploited for child on child bullying and/or abuse, especially during the evenings and weekends. The Supervision Policy outlines the arrangements for the supervision of this activity which is

monitored by residential members of SLT, the residential Nurse and a dedicated RGA (Resident Graduate Assistant).

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

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

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

- Tutor (or an alternative trusted adult) meeting

- Peer mentoring

- The School Counsellor

- Safety and Support Plans

- A RAMP (Risk Assessment Management Plan)

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

Where there is an allegation or concern that a child has abused others, staff should follow guidance laid out in Section 4.4 of the Hertfordshire Safeguarding Children Partnership Inter Agency Child Protection Procedures manual, 'Children Who Abuse Others': http://hertsscb.proceduresonline.com/chapters/p_chil_abuse.html

Staff should also refer to Part Five of Keeping Children Safe in Education (DfE 2024) – 'Child on child sexual violence and sexual harassment': https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

Serious Violence

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

- Increased absence from school

- Change in friendships or relationships with older individuals or groups

- Significant decline in performance

- Signs of self harm or significant change in wellbeing

- Signs of assault or unexplained injuries

- Unexplained gifts/new possessions

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

Recognising Possible Signs of Abuse

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

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

- Physical abuse

- Emotional abuse

- Sexual abuse

- Neglect

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

Generally, in an abusive relationship, the child may:

- Appear frightened of the parent/s or other household members e.g. siblings or others outside of the home.

- Act in a way that is inappropriate to her / his age and development (full account needs to be taken of different patterns of development and different ethnic groups).

- Display insufficient sense of 'boundaries', lack stranger awareness.

- Appear wary of adults and display 'frozen watchfulness'.

Exploitation

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimisation, oppression or ill-treatment.

Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE)**: this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.
- **Child Labor Exploitation**: this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.
- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.
- **Child Criminal Exploitation (CCE)**: this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

Other Specific Forms of Abuse and Safeguarding Issues

Children and young people can be influenced by a whole range of environments and people outside of their family. For example, in school or college, in the local community, in their peer groups or online. Children and young people may encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that children and young people may encounter multiple risks. Some of these risks, along with other further specific forms of abuse are discussed in more detail in Annex B of KCSiE 2024. These include:

- Child abduction

- Child Sexual Exploitation (CSE)

- Child Criminal Exploitation (CCE)

- County Lines

- Children and the Court system

- Children missing from education

- Children with family members in prison

- Cybercrime

- Domestic abuse

- Homelessness

- Mental health

- Modern Slavery and the National Referral Mechanism

- Preventing radicalization

- The Prevent Duty

- Channel

- Sexual violence and Sexual harassment between children in schools

- Serious Violence

- FGM and the mandatory reporting duty for teachers

- Forced marriage

This policy includes advice and information on a number of these below, although these should be read in conjunction with Annex B of KCSiE 2024.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. At The Purcell School, older day students may be travelling to and from school independently and boarders may be allowed off site at evenings and weekends, and it is important that we provide them with practical advice on how to keep themselves safe. Where appropriate, this advice may be given by pastoral and boarding staff, or by visitors from external agencies, including local police staff. Further information is available at www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are age appropriate guides available from the Gov.uk website to support children 5-11-year olds and 12-17 year olds which will be made available to any student at The Purcell School who is required to attend criminal court(s). Making child arrangements via the family courts following separation can be stressful and entrench conflict in families and it is important that any staff / volunteers working with a student in this or similar situations recognise that this can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers and the DSL (or deputy as appropriate) will pass this information on if required.

Children Absent from Education

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

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to

economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information including definitions and indicators are included in Annex B of KCSiE (DfE 2024).

Cybercrime

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a deputy), will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC-When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK. Further information can be found in Annexe B of KCSIE (2021) and The Purcell School H10 Online Safety Policy.

Mental Health

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate

action should be taken by following the procedures in this policy and speaking to the DSL.

PREVENT: Safeguarding Children and Young People from Radicalisation

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

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have "due regard to the need to prevent people from being drawn into terrorism." (KCSiE [DfE 2024]). The Prevent guidance was updated in December 2023 and can be found online here: https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Web_1_.pdf

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

Local Hertfordshire County Council guidance on Prevent is featured at 5.3.9 of the Hertfordshire Safeguarding Children's Partnership CP procedures 5.3.9 Prevent Guidance which outlines the specific duties in Hertfordshire. This guidance also features advice on making a Prevent referral.

Domestic Abuse

Domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can be, but is not limited to, psychological; physical; sexual; financial; or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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

Homelessness

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

will refer any concerns about the financial situation of families to the DSL where appropriate, in order for the DSL to identify any particular vulnerabilities that may lead to a risk of homelessness.

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

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

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

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse. Staff must be aware of the mandatory reporting duty to the Police.

- Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of either one or both parties and coercion is used.

Responding to Abuse and/or Neglect

All staff, volunteers, and governors must follow the procedures set out below in the event of a safeguarding concern that meets the threshold for a referral to Children's Social Care. For early help intervention see the continuum of need and the Families First Portal

If a child is suffering or likely to suffer harm, or in immediate danger:

Urgent Response: Designated Safeguarding Lead

- If the child is at immediate risk of significant harm or likelihood of significant harm they will call Children's Services 0300 123 4043 and / or police 999 and then complete the request for support form specifying their child protection concerns (or other appropriate contacts depending on the LA of the child's home address

- Alternatively, if not an immediate risk but the child is considered to be suffering or at risk of suffering significant harm they will complete the request for support form, specifying their child protection concerns.

Urgent Response: All School Staff

Anyone can make a referral to Police and/or Children's Services, therefore we expect all staff and volunteers in our school community to act immediately and not delay if they consider a child to be in immediate danger using the pathways below.

For non-DSLs to make a referral to Children's Social Care:

- Call 0300 123 4043 followed by a [request for support form.](link) The staff member must inform the DSL as soon as possible.

To contact the Police:

- Call Police on 999 if urgent, if not urgent call 101.

If a child resides in another Local Authority (out of Hertfordshire) the GOV.UK webpage for reporting child abuse to your local council: [Report child abuse to a local council - GOV.UK (www.gov.uk)](link) is accessible to assist staff.

Concerns about a child (not considered to be suffering harm, at risk of suffering harm or in immediate danger)

As per KCSiE (2024), staff "*should be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision*". Where staff have a concern for a child which does not indicate that they are suffering or likely to suffer immediate harm or in immediate danger they should report these concerns using the school's reporting system, MyConcern. All staff have a login to this service which can be accessed by any internet-enabled device in order to report concerns. Instructions on using MyConcern are provided during induction to all staff and online guides are provided for staff to access on the School's Google Drive shared space. More information is provided in the Record Keeping section of this policy.

Upon receipt of the MyConcern report, the DSL (or deputy DSL) should consult Hertfordshire's Continuum of Need or, if needed, seek further consultation to consider an appropriate level of response to take. Our D(D)SLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. They will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.

Responding to a Disclosure

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

- Listen to what is being said without displaying shock or disbelief.

- Accept what is being said.

- Allow the child to talk freely.

- Reassure the child, but not make promises which might not be possible to keep.

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

- Reassure him or her that what has happened is not his or her fault.

- Stress that it was the right thing to tell.

- Listen, rather than ask leading questions.

- Not criticise the alleged perpetrator.

- Explain what has to be done next and who has to be told.

- Ensure that the child feels secure once the disclosure is concluded.

- Record on MyConcern (see Record Keeping)

- Pass the information to the DSL without delay (if recording using MyConcern this will be automatically passed to the DSL and their deputies).

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

We consider the term 'the child's voice' to represent not only what children say directly, but rather the many ways that children communicate with us, including both verbal and non-verbal communication. The child's lived experience means seeing and understanding their experiences from their point of view, and our staff understand that it is very important to always record exactly what a child has said rather than interpret this from an adult/ their own perspective.

Students at The Purcell School come from a rich and diverse range of backgrounds, and as such we cannot and do not assume that all children and their families will have English as their first language nor may a child with SEND have speech or language ability to convey verbally any difficulties they may experience without aids and methods to facilitate their voice. Therefore, our staff give careful consideration to knowing that a child may:

- Not feel ready or know how to tell someone that they are being abused, exploited or neglected

- Not recognise their experiences as harmful

- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

All staff and volunteers at The Purcell School must ensure that no child is ever made to feel that they are 'any trouble' if they need time and space to share their worries with an appropriate adult.

Our culture of safeguarding endorses the following principles of meaningful engagement with children to include:

Listen

- Be **patient** – a child may be finding it hard to find the words to express themselves. Let them tell their story in their own words

- **Do not interrogate** – you may 'taint' evidence by asking leading questions or suggesting what may have happened. Maintain your professional curiosity, ask open-ended prompts.

Reassure

- **Reassure** the child they are not in trouble and that they have done the right thing in telling you

- **Do not** tell the child they should have told you sooner

- **Reassure** the child that it is not their fault – victims can often be blamed by their abusers.

- **Do not** promise confidentiality – if the child asks you to keep it a secret, explain who you need to tell to keep them safe, if appropriate

- **Explain** to the child that you will have to share the information and explain what may happen next.

Stay Calm

- **Try not to panic**, be aware of your own reactions and feelings, avoid showing shock, anger, or disgust

- **Do not insult** the alleged abuser, however frustrated you may privately feel, children can be very protective of people they care about, even if that person is abusing them.

Report

- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Where possible this should be done straight onto a MyConcern report. Where this is not possible, this should be written by hand, signed and dated and passed on to the DSL as soon as possible. Alternatively, if appropriate, make a referral to Children's Social Care and/or the Police directly (see section 8). **Prioritise this above all other work**.

- Inform the DSL of your actions as soon as possible.

- **Do not disclose** any information to anyone aside from those within your DSL team, unless you are told to do so by a relevant agency involved in the safeguarding process.

Reporting systems for children

The Purcell School is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their life at home, in the community, online or regarding a member of staff or other children in the school. As outlined above, all our staff are clear on the importance of listening and supporting children when making disclosures, and the need to reassure them.

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when assessing information, considering necessary actions and any subsequent implementation of advice or support.

To achieve this, we have:

- Clear systems in place for children to report abuse, knowing they will be listened to and supported.
    - All students received a safeguarding induction at the start of each academic year in which the relevant staff and processes are explained to them in an age-appropriate manner
    - Posters are placed around the school in all areas (academic, music and boarding) with contact details and pictures of all safeguarding staff
- Accessible reporting systems which are well promoted and understood by the children so they can easily report concerns via this pathway should they wish. We understand that children find different adults easier to talk to and report concerns to, and all staff are trained to receive these concerns. Students are encouraged to share concerns with any appropriate adult, but in practice this will usually be one of the following:
    - DSL or Deputy
    - Tutor
    - Houseparent
    - School Nurse
    - School Counsellor
    - Resident Graduate Assistants
    - Instrumental Teacher
- A clear culture and ethos in our school that promotes taking concerns seriously, and offers children opportunities to safely express their views and any worries they may have.

Third Party Disclosures

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

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

Support

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

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

Reporting a Disclosure

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

Record Keeping

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

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

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

- Make brief notes as soon as possible after the conversation and record on MyConcern;

- Not destroy the original notes in case they are needed by a court;

- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;

- Use the body map (available on MyConcern) to indicate the position of any bruising or other injury as well as a clear description of the injury;

- Record statements and observations rather than interpretations or assumptions.

All written records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer. Staff should make all records via MyConcern to ensure swift and appropriate action can take place.

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

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

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

Action to be Taken by the DSL following a Disclosure

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

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

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

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

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

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

- concerns are not taken seriously within an organisation, or

- action to safeguard the child is not taken by professionals and

- the child is considered to be at continuing risk of harm

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

If, at any point, there is a risk of immediate serious harm to a child a Child Protection Contact should be made to Children's Services immediately. Anybody can make a Child Protection Contact Referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child.

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

Confidentiality

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

- All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police).

- If a child confides in a member of staff / volunteer and requests that the information is kept secret, it is important that the member of staff / volunteer tell the child in a manner appropriate to the child's age / stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

School Procedures

Please see Appendix 4: What to do if you are worried a child is being abused: flowchart. Additional copies are posted on walls in staff areas around the school.

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

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

Concerns that Female Genital Mutilation (FGM) has taken place or a child is at risk of FGM

Keeping Children Safe in Education (2024) explains that FGM includes 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher (persons employed or engaged to carry out teaching work at schools and other institutions in England) who either:

- is informed by a girl under 18 that an act of FGM has been carried out on her;

- or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth)

must **immediately** report this to the Police, **personally** on 999. This is a mandatory, statutory duty and teachers will face disciplinary sanctions for failing to meet it. In addition, staff should also discuss the concerns with the DSL to report to Children's Services, as appropriate.

The duty for teachers above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, the teacher must report to the DSL and follow local safeguarding procedures.

Any other member of staff who discovers that FGM has been carried out on a child under 18 must report this to the DSL immediately to ensure local safeguarding procedures are followed.

If a member of staff who is not a teacher suspects a child is at risk or suspects that FGM has been carried out, they should report to the DSL and follow local safeguarding procedures.

If the allegations raised are against other children, the school should follow section 5.1.17 of the Hertfordshire Safeguarding Children Partnership Procedures Manual – Children Who Abuse Others. Please see the school's anti-bullying policy for more details on procedures to minimise the risk of child on child abuse.

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

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

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

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

Communication with Parents

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

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

- The behavioural response it prompts e.g. a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed;

- Leading to an unreasonable delay;

- Leading to the risk of loss of evidential material;

- Placing a member of staff from any agency at risk.

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

Where reasonably possible the school will hold more than one emergency contact number for each student. (KCSiE [DfE 2024])

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

Concerns about extremism

The Prevent duty is concerned with all forms of terrorism and extremism. It also includes some forms of nonviolent extremism (far right and extreme far right groups, religious extremist groups, environmental and animal rights extremism, unclear ideology).

Unless your concerns indicate that the child is at immediate risk of harm or danger, report your concerns to the DSL. In rare circumstances where the DSL or one of their deputies may not be available, staff should speak with a member of the senior leadership team and/or seek advice from Children's Services, if appropriate. Staff must inform the DSL of their actions as soon as possible.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This can include seeking advice from Hertfordshire County Council's Prevent Programme Manager, a referral to Children's Services 0300 123 4043 or Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

Concerns about mental health

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. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If a staff member has a concern about a child's mental health which they consider to also be a safeguarding concern, they must consider if the child is at risk of immediate harm; and if so, should follow steps above.

If you have a mental health concern about a child that is not also a safeguarding concern, speak to the DSL and School Counsellor to agree a course of action.

The Single Point of Access (SPA) Mental Health phoneline is available 24/7 on 0800 6444 101 and can be used when there is an urgent or 'crisis' concern as well as for moderate and non-urgent concerns. Further information and resources can be found on The Grid.

Staff must remain aware that, without formal mental health training and qualifications, it is not appropriate to attempt to diagnose students with conditions and should refer all concerns to the Medical Centre and Safeguarding Teams in the first instance.

What do to do if you have concerns about an adult's behaviour?

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

- behaved in a way that has harmed a child, or may have harmed a child;

- possibly committed a criminal offence against or related to a child;

- behaved towards a child or children in a way which indicates s/he may pose a risk of harm to children; or

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

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

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

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, school professional standards and professional responsibilities (code of conduct) and Government document '*Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings*' (February 2022) and is available in the Staff Handbook or via the link in appendix 7 of this document.

Concerns that do not meet the 'harm threshold', also known as "low-level concerns"

The School may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with the Staff Code of Conduct and Allegations of Abuse Against Staff Policy – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

The School has 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; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the School are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work, and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO. Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings. **Low-level concerns should be shared confidentially to the Principal**, who is the ultimate decision maker in respect of the response to all low-level concerns.

Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO. Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.

The School uses the Confide system to securely record and review all information regarding allegations made against staff. Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies). Where a pattern is identified, the School will implement appropriate action, for example reviewing the LADO threshold and completing a referral if harm test met.

For further information see:
Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 Managing Allegations Against Adults who work with Children and Young People

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

- Children's Services **0300 123 4043**

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

Online Safety and Filtering

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, The Purcell School aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for the whole school community

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education 2024:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

- **Contact** – being subjected to harmful online interaction with other users, such as pressure from another child(ren), 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, such as 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.

To meet our aims and address the risks above, we will educate students about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology

- Keeping personal information private

- How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim

We will also:

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year

- Educate parents/ carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present

  - Staff will not take pictures or recordings of students on their personal phones or cameras.

- Make all pupils, parents/ carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, students and parents/ carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. More information is included in the Online Safety policy

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

- This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy

Keeping children safe during community activities, after-school clubs and tuition

As a provider, The Purcell School has a legal duty of care to try to ensure our environment is safe for children who visit in addition to those who already attend our setting.

We may receive an allegation or concern relating to an incident that happened when an individual or organisation were using our 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, The Purcell School will follow our safeguarding policies and procedures, including informing the LADO where appropriate.

The governing body will ensure that in circumstances when individuals or organisations hire or rent out school facilities or premises, appropriate arrangements are in place with regards to safeguarding. The governing body will have regard to paragraphs 166 – 167 of KCSiE (DfE,2024) and will take reasonable steps to ensure that any organisation which hires the school premises is compliant with guidance set out in **Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings**. They will therefore ensure that assurance has been / will be given by the provider concerned that they have the appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and will ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these activities are children on the school roll or not.

Record Keeping

The School will hold records confidentially, safely, securely and in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. These records will usually be kept securely online in the MyConcern system, although paper records will be held securely by the DSL in a locked filing cabinet.

Records will 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.

Concerns and referrals will be kept in a separate child protection file for each child (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/ access them.

Safeguarding records relating to an individual child will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022). IRMS Schools Toolkit - Information and Records Management Society

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.

The School will follow recommendation 17.

Receiving in and transferring student records to other education provisions

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

● **5 days** for an in-year transfer, or

● **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the Purcell School DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child.

Retention, archiving and destruction of records

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

- A clear retention policy

- Secure and appropriate system to archive with restricted access

- We have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

What To Do if You Have Concerns About Safeguarding Practices Within the School

All staff, volunteers, contractors, students and parents should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding arrangements. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the school's senior leadership team. This includes allegations reported or made by a child, parent or member of the public.

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

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

In the absence of the Chair of Governors, the Safeguarding Governor, **Sophia Coles**, should be contacted (07917 627350).

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

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

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

If the allegations are about the Principal, then they should be reported directly to the Chair of Governors without informing the Principal (see contact details above, or at the end of Appendix 2).

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Principal will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO). LADO Threshold Guidance may be used to inform this decision – found at 5.1.5 Managing Allegations Against Adults Who Work With Children and Young People

Children's Services – 0300 123 4043

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

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

If it is decided that the allegation requires a child protection strategy meeting or joint evaluation meeting, this will take place in accordance with section 5.1.5 of the Hertfordshire Safeguarding Children Partnership Procedures Manual.

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

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

Safer Working Practice

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the Code of Conduct and Safer Recruitment Consortium document *Guidance for safer working practice for those working with children and young people in education settings (February 2022)* available at https://www.saferrecruitmentconsortium.org/

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

HSCP escalation and complaints procedure:
https://hertsscb.proceduresonline.com/chapters/p_resolution_disagree.html

Possible Outcomes

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

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

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

Supporting Those Involved

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

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

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

Monitoring and Evaluating Child Protection Arrangements

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

- School risk management register;

- Annual review of safeguarding and associated policies;

- Safer recruitment procedures and policies are regularly reviewed and management checks of recruitment files and the Single Central register are carried out;

- Safeguarding is an agenda item on all Education Committee and Governing Body meeting agendas;

- There is a designated Governor (Sophia Coles) with a CP brief who visits the School regularly and reviews school processes;

- Safeguarding is regularly discussed by the SLT;

- The DSL and SLT attend regular training and briefing sessions to ensure they are up to date with legislation and advice in their respective areas;
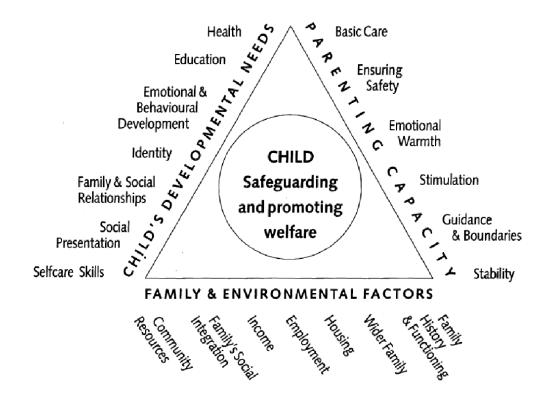
- The Hertfordshire audit document is used to monitor procedures;

- Compliance with the policy is monitored by the DSL and through staff performance measures.

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

Working Together to Safeguard Children (DFE, 2018)

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

Evasive or aggressive towards child or others	Past history in the family of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
Explanation inconsistent with injury	Marginalised or isolated by the community.
Fear of medical help / parents not seeking medical help	Physical or sexual assault or a culture of physical chastisement.
Over chastisement of child	

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

Child	
Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug / solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner' Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour

Parent	Family / Environment
Observed to be aggressive towards child or others	Marginalised or isolated by the community.
Intensely involved with their children, never allowing anyone else to undertake their child's care.	History of mental health, alcohol or drug misuse or domestic violence.
Previous domestic violence	History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
History of abuse or mental health problems	Past history in the care of childhood abuse, self harm, somatising disorder or false allegations of physical or sexual assault
Mental health, drug or alcohol difficulties	Wider parenting difficulties
Cold and unresponsive to the child's emotional needs	Physical or sexual assault or a culture of physical chastisement.
Overly critical of the child	Lack of support from family or social network.

Neglect

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

Child

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

Parent / Family / Environment

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

Sexual Abuse

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

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

APPENDIX 2 – Contact Checklist

DSL & Prevent Lead, **Mr Jan Zbigniew Szafranski** (Head of Sixth Form, Head of Drama)
01923 331113, 07388 631432
z.szafranski@purcell-school.org

Deputy DSL, **Ms Deborah Shah (**Music Department)
01923 331108
d.shah@purcell-school.org

Deputy DSL, **Sally-Ann Whitty** (Learning Support)
01923 331150
s.whitty@purcell-school.org

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

Deputy DSL, **Mr Paul Bambrough** (Principal)
01923 331105
head@purcell-school.org

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

Deputy DSL, **Jane Mitchell** (Director of Boarding)
01923 331116
j.mitchell@purcell-school.org

Chair of Governors, **Dr Bernard Trafford**
Via the Clerk to the Governors, Mr Adam Wroblewski: 01923 331127
a.wroblewski@purcell-school.org

Governor with lead responsibility for Safeguarding
Sophia Coles
07917627350
Sophia.Coles@farrer.co.uk

The Police – 101

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

The Child Abuse Investigation Unit can be contacted on 101.
This is a specialist team that is a department within the police with countywide responsibility for undertaking child protection investigations.
Hertfordshire Safeguarding Children Partnership Team:
Room 147, Postal Point CHO143
County Hall
Hertford

Hertfordshire
SG13 8DF
Telephone: 01992 588757
Fax: 01992 588201
Email: admin.hscb@hertfordshire.gov.uk

Local Authority Designated Officer(s) for Hertfordshire
The Hertfordshire Duty LADO can be contacted by email: LADO.Referral@hertfordshire.gov.uk or via the Lado Referral Form (for professionals use only)

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

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

Hertfordshire Constabulary Prevent Counter Terrorism Channel
For concerns about a person becoming radicalised dial 101 and ask for the PREVENT team.
For urgent police assistance dial 999.

DfE Prevent dedicated telephone helpline
020 7340 7264

NSPCC
0800 800 5000
www.nspcc.org.uk
NSPCC Whistleblowing helpline - for staff who do not feel able to raise concerns regarding child protection failures internally:

help@nspcc.org.uk
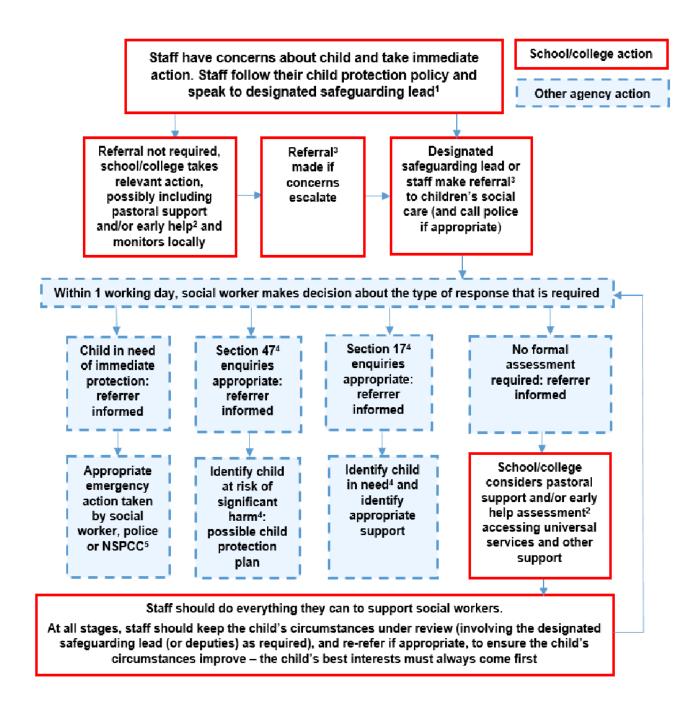0800 029 0285

APPENDIX 3 – Safeguarding Policies

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

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

APPENDIX 4 – Actions Where There Are Concerns About a Child

Flowchart (also found on page 22 of KCSiE [DfE 2023])

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

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

- Assault
- Criminal damage

- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons

This advice aims to support schools and colleges to make defensible decisions when considering whether to involve the police. Further guidance can be found at: **WHEN TO CALL THE POLICE**

APPENDIX 5 - KCSIE (DfE 2024)

On publication of this Child Protection Policy, September 2024, the DSL has decided to provide the hyperlink only to KCSiE rather than the document in its entirety, due to the potential for updates to the content.

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

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

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

Link to KCSiE (DfE, 2024):
Keeping children safe in education 2024 - GOV.UK

APPENDIX 6 – Safer Working Practice

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, the Purcell School Staff Code of Conduct and Safer Recruitment Consortium document *Guidance for safer working practice for those working with children and young people in education settings (February 2023)* available at

https://www.saferrecruitmentconsortium.org/

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

APPENDIX 7 - Operation Encompass

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

Operation Encompass Safeguarding Statement:

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

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

Children Missing From Education in Accordance with Setting Attendance Policy

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

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

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

APPENDIX 8 – Online Safety Guidance

On publication of this Child Protection Policy, September 2024, the DSL has decided to signpost to the document rather than provide the document in its entirety, due to the potential for updates to the content. An overview of the Hertfordshire Guidance is given below, and can be accessed through the provided URL.

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

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

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

APPENDIX 9 - GDPR, Data Protection and Freedom of Information

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

The UK Government has provided additional guidance to support those making decisions on whether to share information or not, and guidance on best practice. This guidance can be accessed at; Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers

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

APPENDIX 10 – S12 Policy for Handling Allegations of Abuse Made Against Staff

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

S12 Policy for Handling Allegations of Abuse Made Against Staff

Section 1: Allegations That May Meet the Harms Threshold

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

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

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

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. A 'case manager' will lead any investigation. This will be Principal, or the Chair of Governors where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the Accused until the Case is Resolved

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

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

consulted

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

Definitions for outcomes of allegation investigations:

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

Procedure for Dealing with Allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension

that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child (see Making barring referrals to the DBS - GOV.UK)

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

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

Additional Considerations for Supply Teachers and all Contracted Staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome
- The governing board/Principal will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Specific actions

Action Following a Criminal Investigation or Prosecution

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

Conclusion of a Case Where the Allegation is Substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals Returning to Work after Suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, Unfounded, False or Malicious Reports

If a report is:

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

Unsubstantiated, Unfounded, False or Malicious Allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or

person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and Information Sharing

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

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

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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning Lessons

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

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

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

Non-recent Allegations

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

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

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

Section 2: Concerns That Do Not Meet the Harm Threshold (also known as low-level concerns)

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

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

Concerns may arise through, for example:

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

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

Definition of Low-level Concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

Sharing Low-level Concerns

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

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

Responding to Low-level Concerns

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

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

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

Record Keeping

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

Records will be:

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

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

References

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

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

Policy author / reviewer:	Policy date / review date:	Next review due:
Paul Bambrough	September 2023	September 2023
Ziggi Szafranski	September 2024	September 2025

APPENDIX 11 – P16 Child on Child Abuse Policy including Youth Produced Sexual Imagery Policy

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

P16 Child-on-Child Abuse Policy
Including Youth Produced Sexual Imagery Policy

This policy should be read in conjunction with the Child Protection and Safeguarding Policy (P1) which contains information on Child-on-Child Abuse. This Policy can be found in the Appendices of the Child Protection and Safeguarding Policy.

Please also refer to: Behaviour and Sanctions Policy, Anti-Bullying including Anti-Cyber-Bullying Policy, Code of Conduct, and Acceptable Use of Technology Policy.

Contents

1. The School's Responsibilities

1. 1 Introduction

The Governors, Senior Leadership Team, and all staff and volunteers at The Purcell School **(the School)** are committed to the prevention, early identification and appropriate management of child-on-child abuse (as defined below), both within and beyond the School.

In particular, we:

- Believe that in order to protect children, all Schools should (a) be aware of the level and nature of risk to which their students are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and (b) take a contextual whole-School approach to preventing and responding to child-on-child abuse;

- Regard the introduction of this policy as a preventative measure, and do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it;

- Recognise national and increasing concern about this issue and emerging guidance, and are committed to implement both policy and latest guidance in order to ensure that our students are safe;

- Encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.

- The School recognises that peer on peer abuse can and may involve any children of any age and who may not necessarily be within their own peer group.

This policy sets out our strategy for preventing, identifying and appropriately managing child-on-child abuse. The policy:

- Applies to all Governors, Senior Leadership Team, staff, volunteers, contractors etc. It is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed. A number of staff are involved in each annual review, which involves and is informed by an assessment of the impact and effectiveness of this policy over the previous year;

- It is the School's overarching policy for any issue that could constitute child-on-child abuse. It relates to, and should be read alongside, the School's Child Protection and Safeguarding Policy (P1) and any other relevant policies including, but not limited to, bullying (including cyber-bullying), youth produced sexual imagery, online safety, students missing in education, students' behaviour and discipline, and exclusions;

- Does not use the term 'victim' and/or 'perpetrator'. This is because our School takes a safeguarding approach to all individuals involved in allegations of, or concerns about, child-on-child abuse, including those who are alleged to have been abused and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many students who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers;

- Uses the term students, which is defined for the purposes of this policy as a person registered as a student at the school.

- Is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (September 2023);

- Should be read in conjunction with Hertfordshire Children Safeguarding Partnership Child Protection Policy and Procedures, and any relevant Practice Guidance issued by it.

2. Understanding Child-on-child Abuse

2.1 What is Child-on-child Abuse?

For these purposes, child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between students and within children's relationships (both intimate and non-intimate).

Child-on-child abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, sexual bullying in schools and other settings can result in the sexual exploitation of students by their peers. For 16 and 17 year olds who are in abusive relationships, what may appear to be a case of domestic violence may also involve sexual exploitation. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences. This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of child-on-child abuse takes into account any potential complexity.

The 2021 Ofsted Review of Sexual Abuse in Schools (the Review) revealed how prevalent sexual harassment and online sexual abuse are for children and young people and their reluctance to report incidents of abuse for a wide variety of reasons. The Review recommends that all schools act as though sexual harassment and online sexual abuse are happening, even when there are no specific reports.

2.2 Specific Forms of Child-on-child Abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. It should be read in conjunction with the School's Anti-Bullying, Online Safety and Child Protection Policies.

a. **Bullying**
Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship

which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways; it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter it can also lead to reluctance to report other behaviour.

The term prejudice-based and discriminatory bullying refers to a range of hurtful behaviour, physical or emotional or both and online, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity.

The School has a separate policy which gives further information and guidance: **P2 Anti-Bullying Policy (including Anti-Cyber Bullying)**

b. **Online Safety**
Inappropriate use of technology, including commerce (gambling) and sexting can form part of abuse or bullying, and it is important that all staff are aware that child-on-child abuse can often take place using social media.

The School has an appropriate level of security to protect users and data. All information connected with online safety is reviewed at least annually, if not more often, to ensure safety and protection for all users.

The School has separate policies which give further information and guidance: **P2 Anti-Bullying Policy (including Anti-Cyber Bullying)** and **H10 Online Safety Policy**

c. **Sexual Violence and Harassment**
Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour, and it may be just as distressing to the young person who instigates it as to the young person it is intended towards.

Sexually harmful behaviour may include
    i. inappropriate sexual language;
    ii. inappropriate role-play;
    iii. sexual touching;
    iv. sexual assault/abuse.

Sexual violence also includes any online element which facilitates, threatens and/or encourages sexual violence.

Sexual harassment can include:
  i.   sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
  ii. sexual 'jokes' or taunting;
  iii. physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature.

Online sexual harassment can include:
  i.   consensual and non-consensual sharing of nude and semi-nude images and videos;
  ii. sharing of unwanted explicit content
  iii. Upskirting;
  iv. sexualised online bullying;
  v.   unwanted sexual comments and messages, including, on social media;
  vi. sexual exploitation; coercion and threats.

d. **Abuse in Intimate Personal Relationships Between Peers**
Abuse in intimate personal relationships between peers is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse.

The abuser uses this pattern of violent and coercive behaviour, in a relationship between young people of any gender, in order to gain power and maintain control over the partner. Abuse in intimate personal relationships between peers is bullying, as is 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.

2.3 Understanding Consent

Consent is defined by section 74 of the Sexual Offences Act 2003 and is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

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

3. What is Contextual Safeguarding?

This policy encapsulates a Contextual Safeguarding approach, which:

- Is an approach to safeguarding students that recognises their experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities;

- Recognises that as students enter adolescence they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse; and

- Considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a school, professionals could work with the school leadership and students body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment.

4. How Prevalent is Child-on-child Abuse?

Research suggests that child-on-child abuse is one of the most common forms of abuse affecting students in the UK.   For example, more than four in ten teenage school girls aged between 13 and 17 in England have experienced sexual coercion (Barter et al 2015). Two thirds of contact sexual abuse experienced by Students aged 17 or under was committed by someone who was also aged 17 or under (Radford et al 2011).

4.1 When Does Behaviour Become Problematic or Abusive?

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

4.2 Sexual Behaviours

As the NSPCC explains 'children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB.' This term has been adopted widely in the field, and is used throughout the NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework, as well as this policy.

For the purpose of the NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework, and as adopted in this policy, harmful sexual behaviours are defined as 'Sexual behaviours expressed by children … that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child… or adult.'

Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a students's sexual behaviour and deciding how to respond to it.

NORMAL	INAPPROPRIATE	PROBLEMATIC	ABUSIVE	VIOLENT
Developmentally expected Socially acceptable Consensual, mutual, reciprocal Shared decision making	Single instances of inappropriate sexual behaviour Socially acceptable behaviour within peer group Context for behaviour may be inappropriate Generally consensual and reciprocal	Problematic and concerning behaviour Developmentally unusual and socially unexpected No overt elements of victimisation Consent issues may be unclear May lack reciprocity or equal power May include levels of compulsivity	Victimising intent or outcome Includes misuse of power Coercion and force to ensure compliance Intrusive Informed consent lacking or not able to be freely given May include elements of expressive violence	Physically violent sexual abuse Highly intrusive Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour Sadism

Hackett's continuum relates exclusively to sexual behaviour and is not exhaustive. The Brook Sexual Behaviours Traffic Light Tool can also be very helpful in identifying sexual behaviours by children. Staff should always use their professional judgment and discuss any concerns with the DSL. Where an (alleged) incident involves a report of sexually harmful behaviour, staff should consult the DfE's Advice.

4.3 Other Behaviour

When dealing with other alleged behaviour, which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- Is socially acceptable
- Involves a single incident or has occurred over a period of time
- Is socially acceptable within the peer group is problematic and concerning
- Involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- Involves an element of coercion or pre-planning
- Involves a power imbalance between the child/ren allegedly responsible for the behaviour and the child/ren allegedly the subject of that power
- Involves a misuse of power

It should be borne in mind that there are some aspects of Hackett's continuum, which may not of course be relevant or appropriate to consider in response to other alleged behaviour involving reports of other types of abuse. For example, the issue of consent and the nuances around it, is unlikely to apply in the same way in cases where the alleged behaviour is reported to involve emotional and/or physical abuse, as it could in cases of alleged sexual behaviour which is reported to involve harmful sexual behaviour.

In addition, the School could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour.

It should also be recognised that the same behaviour presented by different students may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving youth produced sexual imagery may be inappropriate in one context, for example, when exchanged between two students in a consenting relationship, and abusive in another, for example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or (c) used to pressure the child into engaging in other sexual behaviours.

Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital, and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two students may not constitute child-on-child abuse where the fight is a one-off incident, but may be abusive where the child/ren's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual student's basis, but could also apply across the student body.

Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools need to take a whole-school approach in order to prevent escalation. For example, where multiple boys are making inappropriate comments about girls, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise; revising the school's SRE programme; and/or a discussion around whether anything is happening within the wider community that might be affecting the students' behaviour.

It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/ren in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, the School will follow the procedures set out below.

5. How Can a Child who is Being Abused by Their Peers Be Identified?

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which students will disclose or present with behaviour(s) as a result of their experiences will differ.

Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse (please see Appendix 1 (Types of Abuse and Neglect) of the Child Protection Policy for indicators of abuse) of the child protection policy for indicators of abuse) and can include:

    a. Failing to attend School, disengaging from classes or struggling to carry out School related tasks to the standard ordinarily expected;

    b. Physical injuries;

    c. Experiencing difficulties with mental health and/or emotional wellbeing;

    d. Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;

    e. Broader changes in behaviour including alcohol or substance misuse;

    f. Changes in appearance and/or starting to act in a way that is not appropriate for the child's age;

    g. Abusive behaviour towards others.

Abuse affects students very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that Students present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage Students to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

The power dynamic that can exist between students is also very important when identifying and responding to their behaviour: in all cases of child-on-child abuse, a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while students who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

5.1 **Are Some Students Particularly Vulnerable to Abusing or Being Abused By Their Peers?**

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to child-on-child abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, students who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to child-on-child abuse. Students who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.

Research suggests that child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of child-on-child abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender imbalanced environments.

6. A Whole School Approach – How Can the School Raise Awareness of and Prevent Child-on-Child Abuse?

6.1 School Environment

The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- Educating all Governors, Senior Leadership Team, staff and volunteers, students and parents about this issue. This includes:

  o Training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes (a) Contextual Safeguarding; (b) the identification and classification of specific behaviours; and (c) the importance of taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing;

- Educating students about the nature and prevalence of child-on-child abuse via PSHEE and the wider pastoral curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of

child-on-child abuse;

- Embedding RSE within the context of a wide ranging and high quality PSHE/Pastoral Curriculum both within the formal classroom and beyond. The Sixth Form will be provided with significant opportunities for PSHE education through assemblies, the Sixth Form Personal Development Programme, a series of focussed sessions addressing consent, sexual harassment and sexual violence and engagement with external experts;

- Providing additional support to SEN and EAL students where necessary such that they are able to understand the concepts within their own contexts;

- Educating students about consent. This will include teaching them basic facts such as:
    (i) a child under the age of 13 can never consent to any sexual activity;
    (ii) the age of consent is 16; and
    (iii) sexual intercourse without consent is rape;

- Engaging parents on this issue by:

    a. Talking about it with parents, both in groups and one to one;
    b. Asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks;
    c. Involving parents in the review of School policies and lesson plans; and
    d. Encouraging parents to hold the School to account on this issue.
    e. Ensuring that all child-on-child abuse issues are fed back to the School's safeguarding team through MyConcern so that they can spot and address any concerning trends and identify students who may be in need of additional support. This is done by way of a weekly staff meeting at which all concerns about students (including child-on-child abuse issues) are discussed;

- Challenging the attitudes that underlie such abuse (both inside and outside the classroom);

- Working with Governors, Senior Leadership Team, all staff and volunteers, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;

- Creating conditions in which our students can aspire to and realise safe and healthy relationships;

- Providing opportunities for less formal exploration/discussion with a suitably qualified member of staff during boarding time;

- Creating a culture in which our students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and

- Responding to cases of child-on-child abuse promptly and appropriately.

6.2 **Multi Agency Working**

The School actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, children's social care, and/or other relevant agencies, and other Schools.

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early and appropriately handle cases of child-on-child abuse. They help the School (a) to develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist; (b) to ensure that our students are able to access the range of services and support they need quickly; (c) to support and help inform our local community's response to child-on-child abuse; (d) to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our students.

The School actively refers concerns/allegations of child-on-child abuse where necessary to relevant agencies, such as the Hertfordshire Children's Safeguarding Partnership. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

7. Responding to Concerns or Allegations of Child-on-child Abuse – General Principles

It is essential that all concerns/allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School environment.

Any response should:

- Include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);

- Treat all students involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. Schools should ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter;

- Take into account:

    a. That the abuse may indicate wider safeguarding concerns for any of the Students involved, and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the School); family; the

School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/ren's needs and to mitigate risk; and

b.   The potential complexity of child-on-child abuse and of children's experiences and consider the interplay between power, choice and consent. While Students may appear to be making choices, if those choices are limited they are not consenting;

c.   The views of the child/ren affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/ren and their parents and obtain consent to any referral before it is made. The School should manage the child/ren's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

7.1 **What Should You Do If You Suspect Either That A Child May Be At Risk Of Or Experiencing Abuse By Their Peer(s), Or That A Child May Be At Risk Of Abusing Or May Be Abusing Their Peer(s)?**

If a student is in immediate danger, or at risk of significant harm, a referral to children's social care (if the student is aged under 18) and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (see the Child Protection policy for more detail on referrals).

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay (in accordance with the Child Protection and Safeguarding Policy) so that a course of action can be agreed.

If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedure set out in the Child Protection and Safeguarding Policy.

7.2 **How Will the School Respond to Concerns or Allegations of Child-on-child Abuse?**

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all students affected.

DSLs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases, the DSL may wish to consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. The DSL will discuss the allegations/concerns with the Students and Families Hub, and agree on a course of action, which may include:

a. **Manage internally with help from external specialists where appropriate and possible.**
Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

b. **Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/Students and their family.**
These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services

c. **Refer child/Students to children's social care for a section 17 and/or 47 statutory assessment.**
As a matter of best practice, if an incident of child-on-child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the student who has experienced the abuse, and the student who was responsible for it, and the contexts to which the abuse was associated.

d. **Report alleged criminal behaviour to the Police.**
Alleged criminal behaviour will ordinarily be reported to the Police. However, there are some circumstances where it may not be appropriate to report such behaviour to the Police. For example, where the exchange of youth produced sexual imagery does not involve any aggravating factors (please see Appendix C below). All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

7.3 **Individual Risk and Needs Assessment**

Where there is an incident of child-on-child abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse. These risk assessments will:
a. Assess and address the nature and level of risks that are posed and/or faced by the child;
b. Engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term. Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child; and
c. Be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

7.4 **Record Keeping and Monitoring**

School staff maintain records of the welfare and development of individual students. In addition, every complaint or report of bullying is recorded centrally and monitored. The Pastoral Team monitor these records in order to enable patterns to be identified, both in relation to individual students and across the School as a whole and to evaluate the

effectiveness of the School's approach.

8. Disciplinary Action

The School will consider whether disciplinary action may be appropriate for any students involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including (a) to ensure that the student take(s) responsibility for and realise(s) the seriousness of their behaviour; (b) to demonstrate to the student and others that child-on-child abuse can never be tolerated; and (c) to ensure the safety and wellbeing of other students. However, these considerations must be balanced against the student's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action the School will always consider its duty to safeguard all students from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the student; the risk that the student may pose to other students; and the severity of the child-on-child abuse and the causes of it.

The School will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other students in the School. Engaging in Fair Access Panel Processes to assist with decision-making associated to managed moves and exclusions can also be beneficial. Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

8.1 **On-Going Proactive Work To A Contextual Whole-School Approach**

The School's response to concerns/allegations of child-on-child abuse should be part of on-going proactive work by the School to embed best practice and take a contextual whole-School approach to such abuse. As such the School's response can become part of its wider prevention work. This response may include the School asking itself a series of questions about the context in which an incident of child-on-child abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment - such as:

a. What protective factors and influences exist within the School (such as positive peer influences, examples were child-on-child abuse has been challenged etc.) and how can the School bolster these?
b. What protective factors and influences exist within the School (such as positive peer influences, examples were child-on-child abuse has been challenged etc.) and how can the School bolster these?
c. Did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?
d. What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forwards?
e. Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse?
f. How have similar cases been managed in the past and what effect has this had?
g. Does the case or any identified trends highlight areas for development in the way

in which the School works with students to raise their awareness of and/or prevent child-on-child abuse, including by way of the School's PSHEE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work?

h. Are there any lessons to be learnt about the way in which the School engages with parents to address child-on-child abuse issues?
Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?

i. Does this case highlight a need to work with certain students to build their confidence and teach them how to identify and manage abusive behaviour; and were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other students in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the School leadership Team and the DSL.

Policy author / reviewer:	Policy date / review date:	Next review due:
Pastoral Team	8/1/2020	1/9/2020
T Burns	01/09/2020	01/09/2021
T Burns	01/09/2021	01/09/2022
Z Szafranski	29/11/2021 & 12/12/21	01/09/2022
T Burns & Z Szafranski	Autumn 2022	Autumn 2023
Z Szafranski	September 2023	September 2024

Appendix A: Examples of Further Resources and Child-on-child Abuse Statistics

The Crime Survey Data from 2013:

- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/214970/sexualoffending-overview-jan-2013.pdf.

- This includes information around sexual violence; and street based violence perpetrated by young men.

NSPCC:

https://www.nspcc.org.uk/globalassets/documents/research-reports/partner-exploitation-violenceteenage-intimate-relationships-report.pdf

- This 2009 report explores partner exploitation and violence in teenage intimate relationships.

- The Centre for Social Justice:
http://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/11/

- Bullying-RT-Report-1.pdf
This 2016 roundtable report looks at how the education sector can best support Students who self-exclude due to bullying. It sets out a number of important statistics.

Parliamentary and government publications:

- **The scale and impact of sexual harassment and sexual violence in schools**
https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/91/9105.htm
This 2016 publication examines the scale and impact of sexual harassment and sexual violence in Schools.

- **Ofsted Review of sexual abuse in schools and colleges (10 June 2021)**
  - https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges
  This 2021 publication summarises the findings and recommendations of the rapid review of sexual abuse in schools and colleges that the Government asked Ofsted to carry out

- The school has issued its own response to the Ofsted Review and DfE Guidance which can be found appended to the following policies:
  - P1 Child Protection and Safeguarding Policy
  - PSHEE Policy
  - RSE Policy

1. Identifying, Assessing and Responding to Behaviour

The following links are designed to help professionals working with Students to identify, categorise and respond appropriately to sexual behaviours by children:

- NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework: https://www.nspcc.org.uk/services-and-resources/research-and resources/2016/harmful-sexualbehaviour-framework/, which contains the continuum model proposed by Simon Hackett (2010), and provides Schools with information about what to expect from local partnerships.

- NSPCC guidance on the stages of normal sexual behaviour: https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/healthy-sexual behaviourchildren-young-people/

- NSPCC: https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmfulsexualbehaviour/research-resources/

- Brook Sexual Behaviours Traffic Light Tool: https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool

- There is a Fair Access Panel Referral form to capture child-on-child abuse as a reason for a move or exclusion, and accompanying practitioner video.

2. Educating Staff and Students

- Serious Youth Violence – Home Office 'This is abuse - campaign for Schools': https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/410010/2015-03-08_This_is_Abuse_campaign_summary_report__2_.pdf

- New youth produced imagery guidance: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

- Anti-bullying guidance: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

- Cyber bullying: http://www.childnet.com/ufiles/Cyberbullying-guidance2.pdf

- Learning project briefing on the role of Schools in preventing, and responding to, child-on-child abuse

- AVA Prevention platform has produced guidance for Schools on how to develop students' understanding and skills to prevent violence against women and girls (VAWG): http://www.preventionplatform.co.uk/

- Tender works with Schools providing educational programmes for Students and staff training aimed at preventing domestic abuse and sexual violence and promoting healthy relationships based on equality and respect: http://tender.org.uk/

- Childnet: http://www.childnet.com/resources/pshetoolkit

3. Support and Interventions

- The charity, the Lucy Faithfull Foundation (LFF), provides services to agencies working with Students and their families – for those with problematic sexual behaviour on the internet and in the 'real world':
  http://www.lucyfaithfull.org.uk/files/inform_yp_agencies_leaflet.pdf

- LFF also provides information for parents and carers of children:
  http://www.lucyfaithfull.org.uk/files/inform_yp_parents_leaflet.pdf

- Red Balloon Learning Centres: http://www.redballoonlearner.org/

- Leap Confronting Conflict: http://www.leapconfrontingconflict.org.uk/

- Barnardo's:
  https://www.barnardos.org.uk/what_we_do/our_work/sexual_exploitation/cse-professionals/csecan-you-see-it.htm

4. General

- Contextual Safeguarding Practitioners' Network: www.contextualsafeguarding.org.uk

Appendix B: Protocols

Refer

- Refer the matter as soon as possible and in any event within 24 hours, with all relevant details including records and evidence to the DSL/DDSL

- The DSL/DDSL will ask you for the key facts in the forms contained at the end of this policy

- A decision will then be made whether to refer further by the DSL/DDSL

- Records will be kept of the action taken and by whom.

If a student is in **immediate** danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anybody can make a referral in these circumstances.

All action is taken in accordance with the following guidance;

- Hertfordshire Children Safeguarding Board procedures

- Keeping Children Safe in Education (DfE, 2023)

- Working Together to Safeguard Students (DfE, 2019)

- PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015)

Appendix C: Youth Produced Sexual Imagery Policy

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC research has revealed that when students are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.' Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages rather than images.

This policy only covers the sharing of sexual imagery by children. Creating and sharing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks which need careful management.

On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'. This is to ensure clarity about the issues this advice addresses.

1. What is Youth Produced Sexual Imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes students sharing images that they, or another child, have created of themselves.

- 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.

- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

1. 1 What Types of Incidents Are Covered By This Policy?

YES:
- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18).
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.
- A child is in possession of sexual imagery created by another child.

NO:
- The sharing of sexual imagery of students by adults constitutes child sexual abuse and schools should always inform the police.
- Students sharing adult pornography or exchanging sexual texts which do not contain imagery.
- Sexual imagery downloaded from the internet by a child.
- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult.

1. 2 Disclosure

Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in School, or any member of the School staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or colleague, or inform the police directly.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training and within the School's child protection policy.

Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in School is a last resort and they may have already tried to resolve the issue themselves.

1. 3 Handling Incidents

All incidents involving youth produced sexual imagery should be responded to in line with the School's Child Protection policy.

When an incident involving youth produced sexual imagery comes to a member of staff's attention:
- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate School staff.
- The DSL will follow the procedures and guidance set out in Sexting in schools and colleges: responding to incidents and safeguarding children.
- There should be subsequent interviews with the students involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm.
- At any point in the process if there is a concern a child has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

1. 4 Education

Teaching about safeguarding issues in the classroom can prevent harm by providing students with skills, attributes and knowledge to help them navigate risks. The School will provide students with opportunities to learn about the issue of youth produced sexual imagery, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities – as also referred to in the School's ICT Acceptable Use Policy.

Appendix D: Risk Assessment Template

Where there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment, considering:

- The victim, especially their protection and support

- Whether there may have been other victims

- The alleged perpetrator(s)

- All other children at the school (and adult students and staff, if appropriate), especially any actions that are appropriate to protect them

Where there's been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.
Record these risk assessments and keep them under review.

The DSL (or a deputy) will engage with children's social care and specialist services as required:

- Where there's been a report of sexual violence, your risk assessment will likely need input from social workers or sexual violence specialists within the school's local multi-agency safeguarding team

- The school will use any MAST assessments to inform your school's approach and update their own risk assessment accordingly. This is outlined in paragraphs 445 to 447 of KCSI

The following risk assessment can act as a template in these situations:

AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES	ACTIONS
Details of the incident	• How serious is the incident? Was it a crime?			Use this column to record additional information that may be relevant	

				For example, previous, unrelated behaviour incidents	
Record details of the incident from the point of view of both children	• Were there any other victims? [If yes, add extra columns for each other child] • Do we need to make arrangements to limit contact between the children involved, other than keeping them a reasonable distance apart on school premises including at before and after-school activities? (If the allegation relates to rape, assault by penetration, or sexual assault, the answer is automatically yes) • How did the school find out about it? Was it reported directly or by someone else with knowledge of the incident? • Did the incident take place within an intimate relationship between the children? • Are there any related issues, including links to child sexual exploitation and child criminal exploitation?				

Social risks	• Do the children share a peer group? Are people in their friend group likely to take sides?
	• Do they both attend your school?
	• Do other people know about the incident? Do those people understand:
	  o Who they can talk to if they have concerns about the people involved, or about their own safety and wellbeing
	  o The importance of confidentiality
	  o If, and how, they may need to be involved in any further investigations
	• Are they likely to be the subject of gossip, bullying or further harassment?				

	• Have there been previous incidents of sexually inappropriate behaviour within their peer group(s)? • Do they risk being alienated from their friend group(s) as a result of this incident?				
Physical risks	• Do they feel, or continue to feel, physically threatened by the other child? • Do you have reason to believe there is a continued risk to the safety and wellbeing of the children involved, or other pupils and staff? • Is either party at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers) • Do they share classes/break times/etc.? • Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school? How can such contact be limited?				
Environmental risks	• Do they live in a home where violence or abuse has occurred? • Do they live in or near an area or location known to police to be high risk for sexual harassment or assault? • Are they active on social media? If so, how? Do they know how to protect themselves from online grooming? • What activities do they take part in outside of school? • Are parents clear about: o How the school (and partner agencies) are handling the incident?				

	o Confidentiality? o The conduct expected of them while an investigation is ongoing?				

DATE	UPDATES MADE	REASONS FOR UPDATES	UPDATES MADE BY
	E.g, "Updated music practice/boarding/lunchtime arrangements"	E.g, "Feedback from Child A"	