

CHILD PROTECTION POLICY

This policy refers to both Wellington Senior School and Wellington Prep School

THIS POLICY WAS RATIFIED BY THE FULL GOVERNING BODY ON 9 JUNE 2017

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Headmaster	Henry Price
Author	Deputy Head Pastoral
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This policy will be reviewed annually or according to statutory change.	

Child Protection at Wellington School

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Nominated Safeguarding Governor

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Headmaster

Mr Henry Price

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Chair of Governors

Ms Anna Govey

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External Agencies - Child Protection Contact numbers

Somerset Safeguarding Children Board (Somerset Direct)	0300 123 2224
Somerset Emergency Duty Team (evenings, weekends and bank holidays)	0300 123 2327
Children's Safeguarding Leads Consultation Line	0300 123 3078
Early Help Advice Hub	01823 355 803
Devon Local Safeguarding Children Board	0345 155 1071
Devon out of hours Emergency Duty Team	0345 6000388
Local Authority Designated Officer (LADO) Anthony Goble	0845 3459122
Education Safeguarding Advisor, Support Services for Education Jane Weatherill	01823 334475
Police Safeguarding Coordination Unit safeguardingcoordinationunitsouthern@avonandsomerset.pnn.police.uk	01823 349037
Police non-emergency number	101
Police emergency number (including high risk Prevent enquiries)	999
OFSTED Safeguarding Children (Monday to Friday from 8am to 6pm) Whistleblowing@ofsted.gov.uk	08456 404046
The Disclosure and Barring Service PO Box 181, Darlington, DL1 9FA	01325 953 795
Regional Police Prevent Team channelsw@avonandsomerset.pnn.police.uk	01179 455 536 or 01179 455 539

DI Dickon Turner

Email: richard.turner@avonandsomerset.pnn.police.uk

Tel: 0117 9455 536

Mobile: 07823 361635

DS Mandy Pilling

Email: Mandy.Pilling@avonandsomerset.police.uk

Tel: 01934 638470

Mobile: 07585 307109

PC Mike Perry

Tel: 0117 9455 536

Prevent Team - Somerset County Council

Lucy Macready (Chair of the Somerset Prevent Board and Service Manager – Community Safety)

Email: LMacready@somerset.gov.uk

Tel: 01823 359146

Mobile: 07887 955440

Prevent Lead - Taunton Deane and West Somerset Borough Council

Scott Weetch

Email: s.weetch@tauntondeane.gov.uk

Anti-terrorist Hotline

0800 789321

Non-emergency DfE advice

020 7340 7264

counter-extremism@education.gsi.gov.uk

NSPCC Whistleblowing Advice Line

0800 028 0285

National College for Teaching and Leadership

0345 609 0009

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1. Overview of safeguarding

Terminology

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

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

1.1 Statement of intent

The safety and welfare of all our pupils at Wellington School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. In all matters relating to child protection the School will follow the procedures laid down by our own (or where appropriate the relevant child's) Local Safeguarding Children Board (LSCB) which is Somerset Safeguarding Children Board together with DfE guidance contained in *Working Together to Safeguard Children* (26 March 2015) and *Keeping Children Safe in Education*: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> (KCSIE Sept 2016). The School also has regard to the DfE guidance in *Prevent Duty Guidance; for England and Wales* (March 2015). This policy is applicable to the whole School community, including those pupils in the Early Years Foundation Stage (EYFS).

All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy; safeguarding and promoting the welfare of children is everyone's responsibility. This includes a duty both to children in need and to children at risk of harm. All staff should read at least Part 1 and Annex A of KCSIE. All School staff should be aware that child protection incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

1.2 Related safeguarding policies

The following policies are available on the School website:

- Anti-Bullying Policy;
- Staff Code of Conduct;
- Supervision of Pupils Policy;
- Safer Recruitment Policy;
- E-Safety Policy;
- Whistleblowing Policy;
- Trips and Expeditions Policy;
- Health and Safety Statement of Intent;
- Visitors Policy;

1.3 What is child abuse?

The departmental advice: What to do if you are worried a child is being abused - Advice for Practitioners (<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>) should be referred to by all staff in raising their awareness of and helping them to identify the signs of child abuse. The NSPCC website (<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>) also provides helpful information on types of abuse and what to look out for which staff are encouraged to refer to.

Annex A of KCSIE should also be referred to by all senior members of staff and those staff working directly with children. We ensure all staff to read Annex A as part of their induction and ongoing training.

1.4 Other safeguarding issues

Staff will be made aware that safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours linked to drug taking, alcohol abuse, truancy, gender based violence and sexting also put children in danger.

The School recognises that children are capable of abusing their peers. The School does not tolerate sexting and incidents will be dealt with under the School's Anti-bullying Policy and Youth Produced Sexual Imagery Procedures (Sexting). The School also recognises the different gender issues that can be prevalent in peer on peer abuse, for example, girls being sexually touched or boys being subjected to initiation/hazing type violence. All peer on peer abuse will be managed in accordance with this policy; a bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm and will warrant a response under these procedures rather than the Promoting Good Behaviour Policies for the Senior and Prep Schools as appropriate.

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

Victims and perpetrators of peer on peer abuse will be offered support by the School as appropriate, for example counselling.

1.5 Child's wishes

Where there is a safeguarding concern the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide.

Staff are trained to:

Receive, Reassure, Respond, Record, Refer:

- RECEIVE what is said by a child in a non-judgmental way; to ask open questions to help the child communicate the issue; to listen carefully to what the child wants, but never promising confidentiality
- To Reassure the child that they are right to disclose the matter; that their wellbeing is what is most important and that they will be consulted at each step of the process with their permission being sought at each stage where information is to be shared
- Respond to the child with clarity and sensitivity and to explain what will happen next
- Record the conversation with the child in detail, noting times and dates and ensuring the facts are recorded only, not opinion
- Explain to the child the matter will be referred to the DSL/Deputy DSL within 24 hours

The School will operate processes with the best interests of the pupil at their heart.

If an Early Help Assessment is to be made to Children's Services, the School will seek the permission of the child and the parents, unless it would put the child at risk to do so.

Somerset LSCB guidelines state that permission is not a prerequisite for an EHA at Level 3 and 4. However, an EHA should not be made without permission at Level 2. Full details of Somerset LCB guidelines and thresholds can be found at <http://sscb.safeguardingsomerset.org.uk/effectivesupport-documents/>

1.6 Transparency

Wellington School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting Wellington School. Copies of this policy, together with our other policies relating to safeguarding are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the School. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

1.7 Boarding school issues

As a boarding school there are additional factors to consider with regards to safeguarding set out in the National Minimum Standards. Staff are alert to inappropriate pupil relationships, initiation type behaviours and the potential for peer on peer abuse, particularly if there is a significant gender imbalance.

Boarding Staff receive additional induction and safeguarding training tailored to meet their specific, additional duties.

1.8 Safer employment practices

Wellington School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. *Please also see the School's Safer Recruitment Policy and Staff Code of Conduct.*

In line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2016), the governing body prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors or consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.

The School works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

As part of carrying out safe recruitment procedures under KCSIE, members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Further checks will also include a check for information about any teacher sanction or restrictions that an EEA professional regulating authority has imposed. Those undertaking management posts will be subject to prohibition from management of independent schools checks.

All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at School or on another site.

Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

This policy is reviewed by governors annually. Please also refer to the School's Safer Recruitment Policy for further details.

2. Roles and responsibilities

2.1 Raising awareness

The governors have appointed a liaison governor for safeguarding issues. The role of the Nominated Safeguarding Governor is outlined in Appendix 3 of the Governors' Code of Practice. With regard to the role of the Chair of Governors and Nominated Safeguarding Governor in relation to allegations against staff and volunteers, please see section 5.2 below. The governors, in conjunction with the Designated Safeguarding Lead (DSL), carry out an annual review of the School's safeguarding policy and procedures with day-to-day issues being delegated to the School's safeguarding committees in the Senior School and Prep School, which both the DSL and Nominated Governor for Child Protection attend. The governing body is responsible for:

- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay; and
- approving amendments to safeguarding arrangements in the light of changing Regulations or recommended best practice.

We recognise that the School plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

2.2 Designated Safeguarding Lead

The DSLs for the Senior School, Prep School and EYFS have been fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in Annex B of Keeping Children Safe in Education. The DSLs are members of the senior leadership team at the Senior and Prep Schools respectively.

The School has Deputy DSLs who are trained to the same standard as the DSLs.

The DSLs and Deputy DSL undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. The DSLs and the Deputy DSL also attend refresher updates at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role. They have a job description for their safeguarding roles and key activities. The DSL role is to ensure that each member of staff has access to and is aware of and understands the School's safeguarding policy and procedures. Their training meets the requirements of the DfE's 'Keeping Children Safe in Education' (KCSIE). The DSLs have ultimate responsibility for safeguarding and child protection in the School and do not delegate this responsibility.

The main responsibilities of the Senior School DSL and the Prep School DSL are to:

- liaise with the local authority and work with other agencies in line with *Working Together to Safeguard Children 2015*;
- be available to discuss concerns about suspected child abuse with staff;
- take responsibility for procedures and referrals;
- act as a focal point for liaison with authorised agencies;
- undertake training as required by the LSCB which includes inter-agency working protocols and training in the LSCB's approach to *Prevent* duties;

- ensure all staff including part-time staff and volunteers who assist with school duties are made aware of child protection issues and receive appropriate training with updates given at least annually;
- support staff involved in child protection cases;
- monitor and evaluate the effectiveness of the School's Child Protection Policy;
- report annually to the Governing Body via the designated governor;
- complete the LSCB annual return;
- attend the Independent Schools' Safeguarding meetings (October/March);
- organise, and report on a termly meeting of the safeguarding officers and governor;
- provide routine overview reports on safeguarding arrangements to the Pastoral and Co-curricular and Audit, Risk and Compliance Governors' sub-committees, full safeguarding team meetings and in EMT meetings.

The DSLs and/or the deputy DSL can be contacted at any time. All staff have their emergency contact telephone numbers.

The DSLs maintain close links with Somerset Safeguarding Children Board and report at least once a year to the governors' on the child protection issues outlined above. The DSLs make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. The DSLs also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against someone working at the School and/or the police if a criminal offence is suspected.

The DSLs liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children 2015 and attendance at strategy meetings. The DSLs work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet.

The DSLs receive focused training to support learning and understanding of the ever changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation. The DSLs undertake Prevent awareness training to enable them to provide advice and support to staff on protecting children from the risk of radicalisation. The DSLs' and the School's focus is to support children in need through seeking early help and/or inter agency working, including using the Team around the Child Approach and/or the Common Assessment Framework.

The School's records on child protection are kept securely in the Senior School DSL and Prep School DSL office as appropriate, and are separated from routine pupil records. Access is restricted to the relevant DSL, the HR Manager, the Prep School Head and the Headmaster as appropriate.

3. Induction and training

Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the School, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or the Headmaster and, if required, to the main points of local procedures of Somerset Safeguarding Children Board to which referrals are made or, in certain circumstances, the police. Child Protection training is also given to new governors and volunteers. The School's particular training arrangements for the prevention of radicalisation follow guidance laid out by Somerset County Council; <http://sscb.safeguardingsomerset.org.uk/protocols-procedures-and-reviews/training/>

All teaching and support staff who work directly with children receive WRAP training delivered by qualified WRAP trainers.

Training in child protection and safeguarding is an important part of the induction process. Induction training includes:

- a review of the School's safeguarding policy including the staff code of conduct policy, and the School's whistleblowing policy; and
- the identity of the DSLs.

Training also promotes staff awareness of child sexual exploitation, Prevent (including referrals to Channel programmes), so called 'honour based' violence, forced marriage and female genital mutilation. Training on the early help process and process for making a referral to children's social care and for statutory assessment that may follow a referral (including what role they may be expected to play in such an assessment) will also be provided together with the importance of maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action *without delay* if such a practice is suspected.

All new staff, including temporary staff and volunteers must read and sign to confirm that they have read Part 1 and Annex A of KCSIE as well as the Child Protection Policy and Staff Code of Conduct.

The Headmaster and all staff receive appropriate safeguarding and child protection training which is regularly updated in line with advice from Somerset Safeguarding Children Board. In addition, the Headmaster and all staff receive safeguarding and child protection updated as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively.

The DSLs and Deputy DSL undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSLs and the Deputy DSL will also receive regular updates as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role.

4. Staff obligations

4.1 Staff obligations

All staff in our School are required to notify the School immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration including 'by association' i.e. they live in the same household (or someone is employed in their household) as someone who has unspent cautions or convictions for a relevant offence (please see a list of the relevant offences set out here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/384712/DBS_referrals_guide_-_relevant_offences_v2.4.pdf). The 'by association' requirement also applies if you live in the same household as or someone is employed in your household who has been disqualified from working with children under the Childcare Act 2006.

The Childcare (Disqualification) Regulations 2009 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the HR Manager immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive. He/she must also notify the School immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

Staff who are disqualified from childcare or registration, including 'by association', may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the HR Manager for more details.

4.2 Preventing radicalisation

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

Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation and may need help or protection. However, staff acknowledge that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

The Home Office statutory Prevent duty guidance can be accessed on:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

The Department for Education non-statutory Prevent duty guidance can be accessed on:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Channel General Awareness course can be accessed on the link below:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

The School, in recognition that pupils may be at risk of being drawn into terrorism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Headmaster, DSL and Deputy DSL and Nominated Safeguarding Governor to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

Further information can be found in the School's Prevent Strategy.

4.3 Visiting speakers

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

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances.

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

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

4.4 Children missing from education

A child going missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect including that a child may be at risk of radicalisation, FGM or forced marriage. Unauthorised absences from school will be managed in accordance with the School's Missing Child Policy.

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. A pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more will be reported to the local authority. For further details on when the School has a duty to report to the local authority, please see the Annex 4 of this policy.

Further details can be found in the School's Attendance Policy.

4.5 Child sexual exploitation

The School recognises that children who are victims of child sexual exploitation may go missing from education. School staff will be alert to possible indicators of child sexual exploitation and any concerns will be managed in accordance with this policy.

4.6 So-called 'Honour based' violence ('HBV')

So-called HBV can include forced marriage and Female Genital Mutilation ('FGM'). School staff will be alert to possible indicators of HBV. Guidance on the warning signs of HBV can be found on pages 38-41 of the Multi-agency statutory guidance of FGM (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage (<https://www.gov.uk/guidance/forced-marriage>).

From October 2015, all teachers (along with social workers and healthcare professionals) have a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Headmaster to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols. Local safeguarding procedures can be found here:

<http://sscb.safeguardingsomerset.org.uk/protocols-procedures-and-reviews/advice-for-professionals/>

Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation: procedural information (<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>)

The local police non-emergency number is in the contact details section at the beginning of this policy.

4.7 Special educational needs and disability

All staff also need to be alert to the specific needs of those pupils who special educational needs and/or disabilities, including young carers. Those with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

4.8 Use of mobile phones and cameras

Neither staff nor children may use their own mobile phones to take photographs within the School's EYFS setting; nursery and up to Reception year. All mobile phones are stored securely within the EYFS setting during contact time with children (this includes staff, visitors, parents, volunteers and students). Please see the School's Taking, Storing and Using Images of Policy and Data Protection Policy for the School's policy on taking photographs of pupils outside of these year groups.

4.9 Online safety

The School will ensure that:

- appropriate filters and monitoring systems are in place to keep children safe online. The School's IT systems are hosted by South West Grid for Learning. The School's filtering system is operated and maintained by RM Education on behalf of SWGFL. The filtering system is called RM Safety Net. A second tier of additional filtering is managed by the School's IT Manager.
- Such systems aims to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm;
- children are taught about safeguarding, including online; and
- staff are equipped with the knowledge to safeguard children online by attending online safety training.

The School's E-Safety Policy also sets out the School's approach to online safety.

5. Child protection procedures

5.1 Procedures for dealing with concerns or suspicions of abuse or neglect

The School treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our school staff are made aware of their duty to safeguard and promote the welfare of children in the School's care. Staff members are alerted to the particular potential vulnerabilities of looked after children.

The School recognises that there may also be children who, whilst not suffering harm or at immediate risk, require additional support from external agencies. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as children's social care). This may lead to a written plan to support a child in need being drawn up or an early help assessment, such as the Common Assessment Framework, being carried out. In either case, the School will liaise and take advice from external agencies as appropriate.

If a member of staff is made aware of **any** allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth. On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.

Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in School is trained to report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to the DSL and submit an accurate written record of the disclosure or concerns. However, any staff member can make a direct referral to children's social care or other external services such as early help services in accordance with the referral threshold set out by Somerset Safeguarding Children Board.

Where staff have concerns that a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. **Anyone** can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL that a referral has been made as soon as possible. Staff must share information with children's social care and/or the police where there are any concerns that a child may be at risk of harm or neglect.

If staff members are unsure about whether or not a referral should be made, they should speak to the DSL. The DSL will contact the Children's Safeguarding Leads Consultation line for advice or direction.. In relation to our nursery/EYFS setting, the School will inform Ofsted as soon as is reasonably practicable, in any event within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

The DSL will refer **all** allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to Somerset Direct within 24 hours, in line with referral thresholds contained within Effective Support for Children and Families Version 2 Jan 2017.

Borderline cases will be discussed with Children's Safeguarding Leads Consultation Line without identifying individuals in the first instance and following discussions Somerset Direct will judge whether or

not an allegation or concern meet the relevant threshold. Somerset Direct will decide in the circumstances what further steps should be taken. This could involve calling the police.

Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where a child's situation does not appear to be improving, the School will follow this up with the children's social care and push for reconsideration where appropriate. Any member of staff who has concerns that a child's situation does not appear to be improving should press for re-consideration.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with social services and the police.

With regard to the Prevent Duty, the School will co-operate with Channel panels and the Police when assessments are being undertaken.

In the case of pupil-on-pupil abuse which the School has reported to Somerset Direct and which Somerset Direct or statutory child protection authority decides not to investigate further, the matter will be dealt with under the Promoting Good Behaviour Policy for the Senior or Prep School as appropriate after discussion with Somerset Direct.

Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must firstly raise this with the Headmaster or DSL without delay. The Headmaster or DSL will consult with external agencies, as appropriate in accordance with this policy. Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to children's social care or the police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with children's social care or the police what information can be disclosed.

The DSL will report safeguarding concerns to the Headmaster (provided they do not concern the Headmaster).

For children in need of additional support from one or more agencies, the School' DSL and Deputy DSL are trained to follow Somerset Safeguarding Children Board's guidance, 'Effective Support for Children and Families in Somerset', that ensures multi-agency support is requested where concerns meet the appropriate threshold and instigated through an Early Help Assessment which is carried out by the DSL or Deputy DSL with guidance and support from the Early Help Advice Hub.

The School's local authority is Somerset County Council which operates the Somerset Safeguarding Children Board (see contact details on page 3).

5.2 Procedures for managing allegations of abuse against staff, volunteers and the Headmaster

The School's procedures for dealing with allegations against any staff member (and volunteers who work with children) aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from vexatious allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

The School will liaise with the LADO, police and social services as to managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Headmaster

and DSL) and volunteers follows Departmental guidance and Somerset Safeguarding Children Board arrangements and apply when staff, including volunteers, have (or alleged to have):

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

Should the allegation of abuse concern the DSL the member of staff should inform the Headmaster and the deputy DSL who will act in the place of the DSL. Should the allegation be against the Headmaster or School governor the DSL will immediately inform the Chair of Governors without the Headmaster or School governor being informed first. It will be the Chair's responsibility to contact the LADO. Should the allegation be against the Chair of Governors the DSL will immediately inform the Nominated Safeguarding Governor. It will be the Nominated Safeguarding Governor's responsibility to contact the LADO.

If the allegation concerns a member of staff, the Headmaster or a volunteer he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The School will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it) or malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice. A copy will only be provided to the individual concerned following consultation with appropriate agencies and agreement has been reached as to what information can be disclosed. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references.

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children. The School recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.

During the course of the investigation the School in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Allegations against a member of staff who is no longer at the School (including historical allegations) should be referred to the police.

Any pupils who are involved will receive appropriate care.

Staff should also have regard to the Staff Code of Conduct to minimise the risk of allegations being made.

5.3 Staff suspension following an allegation

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff the matter will be dealt with in accordance with the Disciplinary and Capability Procedure. However, the School recognises that suspension does not constitute disciplinary action and does not itself imply any presumption of guilt on the part of the employee. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children.

If the allegation is found to be false, and the person has been suspended, then the School will support him or her as best it can, perhaps with the provision of a mentor, to return to work, and will attempt to minimise contact with the pupil(s) involved in making the allegation if they remain at School. The School will consider serious disciplinary action against a pupil who has been found to make deliberately false allegations.

5.4 Whistleblowing

If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy. Concerns regarding the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm may be dealt with in accordance with the School's Managing Allegations of Abuse against staff procedure (see above). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feels that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline (tel: 08000280285 or email: help@nspcc.org.uk).

5.5 External referrals

We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Wellington School will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School will consider making a referral to the National College

for Teaching and Leadership (NCTL) as required by sections 141D and 141E of the Education Act 2002 and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

From October 2015, section 5B of the Female Genital Mutilation Act 2003 placed a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the School's DSL and involve children's social care as appropriate.

Should historical allegations of child abuse be made against a teacher who is no longer teaching, the School will, in accordance with Keeping Children Safe in Education, report the matter to the police. Similarly, allegations against a teacher who is no longer working at the School will also be referred to the police. All allegations of historical abuse should be referred to the Headmaster or DSL straight away.

5.6 Parents

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Headmaster who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from Somerset Direct or the LADO as appropriate.

5.7 Promoting awareness

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our Anti-Bullying Policy.

Time is allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding.

All pupils know that there are adults to whom they can turn to if they are worried, including the School Counsellor, the Chaplain and the medical staff. If the School has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- All pupils have access to a telephone helpline enabling them to call for support in private.
- Every child has a school diary and school planner, both of which contain guidance on where to turn for advice;

- Details of confidential help lines and web addresses for external specialists such as ChildLine, Kidscape, Get Connected and the Samaritans and the School's confidential listener are clearly displayed on all house notice boards (boarding and day);
- Our medical centre and all our boarding houses display advice on where pupils can seek help.
- We operate a peer mentoring scheme whereby trained older pupils are encouraged to offer advice and support to younger pupils.
- We provide leadership training to our School and House Captains;
- All senior pupils with positions of responsibility receive training which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils. Our prefect system (School and House Captains) is regularly supervised by staff, both in a day and boarding context. They have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, School and House Captains are given induction on appointment which includes how to contribute to the School's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse;
- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying please refer to the School's Anti-Bullying Policy. E-safety to pupils is delivered through PSHEE classes, regular assemblies, workshops and lectures.

5.8 Position of trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer the School's Staff Code of Conduct.

5.9 Records

All concerns, discussions and decisions (with reasons) made in accordance with this policy will be recorded in writing.

6. Monitoring and evaluation of this policy

The School monitors and evaluates its safeguarding policy and procedures through the following activities:

- review of the policy annually or after an incident or change of legislation if sooner at regular safeguarding team meetings and by the School's compliance officer;
- governing body visits to the School;
- senior leadership team discussion sessions with children and staff;
- pupil questionnaires;
- frequent scrutiny of attendance data;
- regular analysis of a range of risk assessments;
- regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school;
- frequent scrutiny of governing body meeting minutes;
- logs of bullying and/or racist behaviour incidents in fortnightly pastoral reports are reviewed regularly by the senior leadership team and Nominated Safeguarding Governor;
- regular review of parental concerns and parental questionnaires;
- regular review of the use of pupil-specific leisure rooms and clubs at lunchtime and after school;
- regular review of training offered to staff, including e-safety training.

Appendix 1 – Definitions of abuse (KCSIE 2016)

For further information on the KCSIE definitions of abuse, please read pages 11-13 of Part 1 and Annex A at <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> as set out below:

Types of abuse and neglect

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

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

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

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

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

Specific safeguarding issues

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites.

School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- bullying including cyberbullying;
- children missing education – and Annex A;
- child missing from home or care;
- child sexual exploitation (CSE) – and Annex A;
- domestic violence;
- drugs;
- fabricated or induced illness;
- faith abuse;
- female genital mutilation (FGM) – and Annex A;
- forced marriage- and Annex A;
- gangs and youth violence;
- gender-based violence/violence against women and girls (VAWG);
- hate;
- mental health;
- missing children and adults;
- private fostering;
- preventing radicalisation – and Annex A;
- relationship abuse;
- sexting;
- trafficking.

Annex A contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff who work directly with children should read the annex.

Annex A: Further information

Further information on a child missing from education

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education. A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School and college staff should follow their procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Schools and colleges should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. Further information about children at risk of missing education can be found in the Children Missing Education guidance.

Schools

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers. Schools must place pupils on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date,

the school should consider notifying the local authority at the earliest opportunity to prevent the child from going missing from education.

It is important that the admission register is accurate and kept up to date. Schools should regularly encourage parents to inform them of any changes whenever they occur. This can assist the school and local authority when making enquiries to locate children missing education.

Schools should monitor attendance and address it when it is poor or irregular. All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Where a parent notifies a school that a pupil will live at another address, all schools are required to record in the admission register:

- the full name of the parent with whom the pupil will live;
- the new address; and
- the date from when it is expected the pupil will live at this address.

Where a parent of a pupil notifies the school that the pupil is registered at another school or will be attending a different school in future, schools must record in the admission register:

- the name of the new school; and
- the date on which the pupil first attended or is due to start attending that school.

Schools are required to notify the local authority within five days when a pupil's name is added to the admission register. Schools will need to provide the local authority with all the information held within the admission register about the pupil. This duty does not apply to pupils who are registered at the start of the school's youngest year, unless the local authority requests for such information to be provided.

Schools must also notify the local authority when a pupil's name is to be deleted from the admission register under any of the fifteen grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as amended, as soon as the ground for deletion is met and no later than the time at which the pupil's name is deleted from the register. This duty does not apply where the pupil has completed the school's final year, unless the local authority requests for such information to be provided.

A pupil's name can only be deleted from the admission register under regulation 8(1), sub-paragraph (f)(iii) or (h)(iii) if the school and the local authority have failed to establish the pupil's whereabouts after jointly making reasonable enquiries. Advice on carrying out reasonable enquiries can be found in the Children Missing Education guidance.

Where a school notifies a local authority that a pupil's name is to be deleted from the admission register, the school must provide the local authority with:

- the full name of the pupil;
- the full name and address of any parent with whom the pupil lives;
- at least one telephone number of the parent with whom the pupil lives;
- the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there, if applicable;
- the name of pupil's destination school and the pupil's expected start date there, if applicable; and
- the ground in regulation 8 under which the pupil's name is to be deleted from the admission register.

Schools and local authorities should work together to agree on methods of making returns. When making returns, the school should highlight to the local authority where they have been unable to obtain the necessary information from the parent, for example in cases where the child's destination school or address is unknown. Schools should also consider whether it is appropriate to highlight any contextual information of a vulnerable child who is missing education, such as any safeguarding concerns.

It is essential that schools comply with these duties, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be at risk of not receiving an education and who might be at risk of being harmed, exploited or radicalised.

The department provides a secure internet system – school2school – to allow schools to transfer pupil information to another school when the child moves. All local authority maintained schools are required, when a pupil ceases to be registered at their school and becomes a registered pupil at another school in England or Wales, to send a Common Transfer File (CTF) to the new school. Academies (including free schools) are also strongly encouraged to send CTFs when a pupil leaves to attend another school. Independent schools can be given access to school2school by the department.

The school2school website also contains a searchable area, commonly referred to as the ‘Lost Pupil Database’, where schools can upload CTFs of pupils who have left but their destination or next school is unknown or the child has moved abroad or transferred to a non-maintained school. If a pupil arrives in a school and the previous school is unknown, schools should contact their local authority who will be able to search the database.

Colleges

Where a college is providing education for a child of compulsory school age, the college shall work collaboratively with the appropriate local authority in order to share information about the attendance and/or absences of that child as the local authority deems necessary, as set out in departmental advice Enrolment of 14 to 16 year olds in full time further education. The college should also inform the relevant local authority immediately if that child is removed from the roll so that the local authority can as part of their duty identify children of compulsory school age who are missing education.

Further information on child sexual exploitation

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

Further information on so-called ‘honour based’ violence

So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

Actions

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

FGM mandatory reporting duty

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 with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, 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. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation procedural information.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

Forced marriage

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

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmf@fco.gov.uk.

Further information on preventing radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools' and colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Prevent

From 1 July 2015, specified authorities, including all schools (and, since 18 September 2015, all colleges) as defined in the summary of this guidance, are subject to a 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". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales are specifically concerned with schools (but also cover childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools should ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

The department has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

The Government has launched educate against hate, a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

Channel

School and college staff should understand when it is appropriate to make a referral to the Channel programme.⁸⁵ Channel guidance is available at: Channel guidance. An elearning channel awareness programme for staff is available at: Channel General Awareness. Channel is a programme which

focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism and, where considered appropriate and the necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges that are required to have regard to Keeping children safe in education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

Appendix 2

2.1 Child Protection Incident Reporting Form – Senior School

Wellington School Child Protection Reporting Form

Full name of pupil	
Date of incident	
Time of incident	
Place of incident	
Name of member of staff completing this form and position	
Name(s) of other staff present and position(s)	
Date of notification of the DSL or Deputy DSL	

Before proceeding, have you reassured the pupil that you are there to help them but you cannot guarantee absolute confidentiality? Have you explained that you may need to pass the information on to the Designated Safeguarding Lead, Rowan MacNeary (Deputy Head Pastoral) who will ensure the correct action is taken?

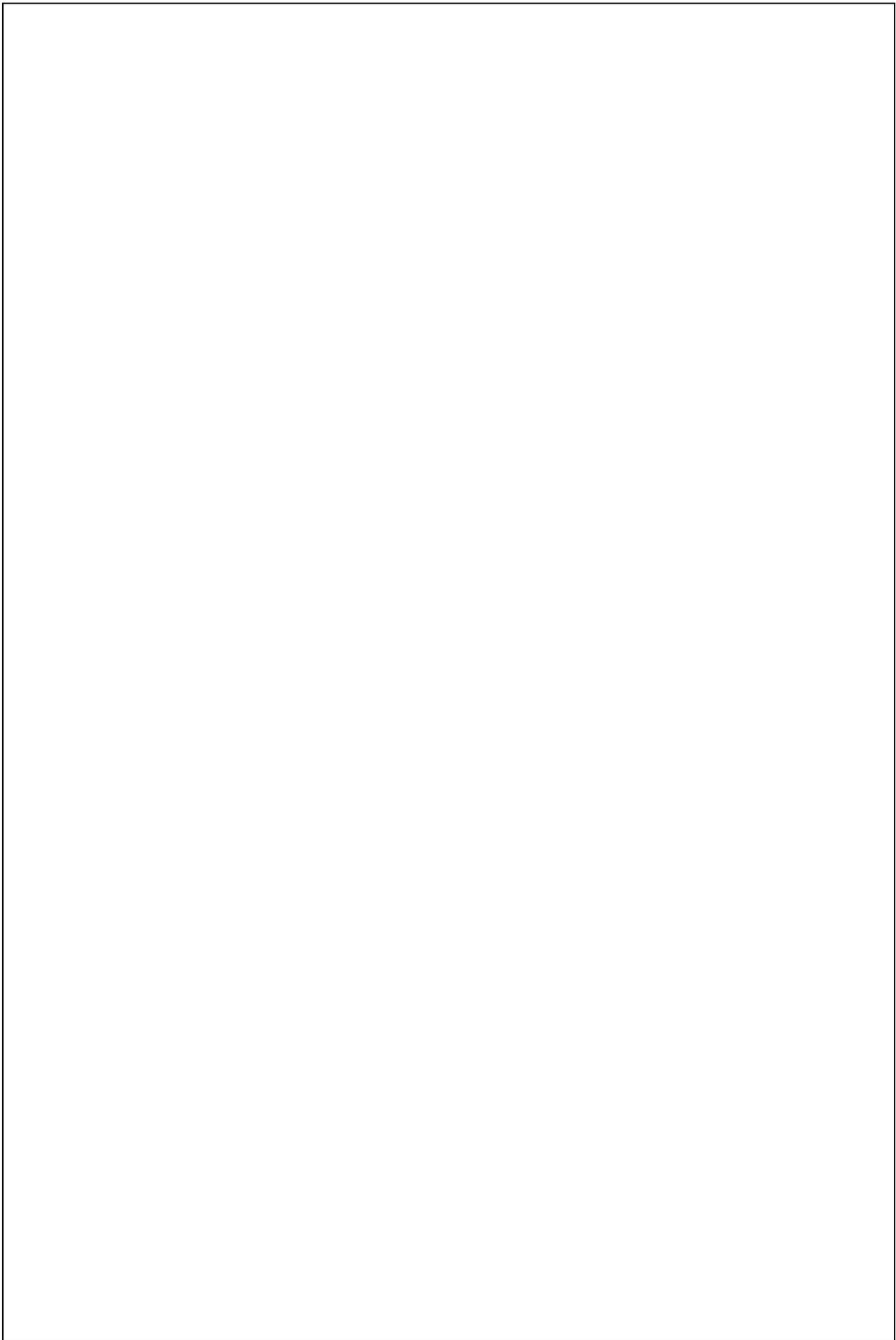
Yes

No

Ask the pupil to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach to the form

Ensure you provide as much detail as possible and consider:

- *What happened and to whom*
- *Where this happened*
- *Names of all individuals involved*
- *Times and dates of incident(s)*
- *Are the pupil's parents/guardian aware – does the pupil want them to be informed?*



Additional notes or evidence

This may include any concerns you have about signs of abuse, emotional ill-treatment or neglect from outside the School. Please also make a record of any other evidence, such as text messages, written notes, clothing that may relate to this matter.

Any suspicion or complaint of abuse must be reported to the DSL or Deputy DSL. If the complaint is against a member of staff this should be reported to the Headmaster or in his absence Tamsin Humphreys, the Nominated Child Protection Governor

DO NOT investigate the matter as this could prejudice the investigations of outside agencies. Your responsibility is to report the matter. If you fear the pupil is in immediate harm you should call the police (101 or 999) and/or call Somerset Direct 0300 1232224.

If the concern involves an allegation against the DSL or Deputy DSL, you must report this directly to the Headmaster. If the concern involves an allegation against the Headmaster, you must report this to

the Chair of Governors

Please record what action you have taken and when

--

Your full name and position	
Signed	
Date	

This section is to be completed by the DSL or Deputy DSL

Detail of decision / action by DSL or Deputy DSL
Reason for this decision by the DSL or Deputy DSL

--

Notes of feedback between DSL / Deputy DSL and the person who reported the issue

--

Notes of feedback between DSL / Deputy DSL and the person who raised this child protection concern, including date of feedback:

--

Tick to confirm that these notes been added to pupil's chronology and a copy placed in pupil's Child Protection file		Tick to confirm this information has been added to School's Child Protection register	
---	--	--	--

Signed by the DSL or Deputy DSL	
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Date	
------	--

- Copies of this form are available to staff in the staff common room, the Deputy Heads' office, and the shared area of the School's IT network,
- This form may be used but a written record must be made following this guidance if the form is not used.
- This form is designed to be completed by any member of staff who receives information raising child protection concerns either through observation or direct disclosure, from a pupil or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received even where this happens away from the School, for example on an educational visit.
- Any disclosure or concern must be reported to the DSL within 24 hours regardless of the completion of this form.
- Do not allow the completion of the form to delay notification of the concerns to the School's DSL but pass the completed form to the DSL, the Headmaster or Chair of Governors as appropriate, as a matter of urgency.

2.2 Confidentiality

- The Headmaster or DSL will disclose any information about a pupil to other members of staff on a need to know basis only. All staff have a professional responsibility to share information with other agencies in order to safeguard children.
- Staff cannot promise a child to keep secrets which might compromise the child's safety or welfare or which might implicate others in serious misconduct.
- The School will always undertake to share our intention to refer a child to Children's Services with parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the Children's Safeguarding Leads Consultation Line on this point.
- Personal information will only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998, European Convention on Human Rights, Article 8). Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, obtaining consent may not be possible or in the best interest of the child or young person, e.g., where safety and welfare of that child or young person necessitates that the information should be shared. The law permits the disclosure of confidential information necessary to safeguard a child or children. Disclosure should be justifiable in each case, according to the particular facts of the case, and legal advice should be sought if in doubt.

2.3 Data protection

- The School holds personal information about pupils in order to safeguard and promote their welfare, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure compliance with all relevant legal obligations.

- The content of this form, when completed, will contain personal information which is subject to the provisions of the Data Protection Act 1998. Pupils, and in certain circumstances their parents, have the right to request access to personal information about them held by the School, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to pupils or parents.
- The School will keep this record confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the Headmaster or the DSL, it is deemed necessary we may share this information with the social services or the police for the purpose of child protection investigations.
- All information related to any child protection matter is held securely by the DSL. All hard copies of documents are secured in a locked filing cabinet within the DSL's office. All electronic copies are password protected within the DSLs secure user area on the School's IT network.

Appendix 3 - Child Protection Incident Reporting Form – Prep School

Record of Safeguarding Concern

Page no.

Name of child (print):

Parent Name:

Date of birth:

Year/class:

Notes of discussion: (Receive, Reassure, Respond and Record)
Include as much detail as possible inc. names, dates, times, peers involved.

Date of concern:	Date passed to DSL:
Signature of staff member:	DSL sign received:

Action taken (update front sheet chronology as appropriate)

Outcome:

Record completed by DSL (print)

Signed..... Date.....

Appendix 4 – Children missing in education

Due consideration will be given to the statutory and non- statutory guidance in relation to the safeguarding and education of pupils. In all cases regarding a pupil's non- attendance at school or removal from roll, the Headmaster will advise the Local Authority in which the child lives at the earliest opportunity.

1. School age

A child reaches compulsory school age on or after their fifth birthday. If they turn 5 between 1 January and 31 March they are of compulsory school age on 31 March; if they turn 5 between 1 April and 31 August they are of compulsory school age on 31 August. If they turn 5 between 1 September and 31 December, then they are of compulsory school age on 31st December.

A child continues to be of compulsory school age until the last Friday of June in the school year that they reach sixteen. From September 2013 all 16 year-olds will be required to continue in education or training, until the end of the academic year in which they turn 17. From September 2015 they will be required to continue until their 18th birthday.

2. Entitlement to full-time education

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. Wellington School recognises its responsibility in this. Wellington will monitor all pupil attendance and report any pupil who goes missing from education.

3. Sign of abuse or neglect

A child who goes missing from Wellington School could be at risk of abuse or neglect. The School and staff will follow the School's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, travelling to conflict zones, FGM and forced marriage, and to help prevent the risks of their going missing in future.

4. Procedures for monitoring and reporting missing pupils

- Wellington School has an admission register and an attendance register. All pupils are placed on both registers;
- Attendance registers are taken throughout the day, for both day pupils and boarders. Particular scrutiny is applied to first morning registration and first afternoon registration;
- In the Senior School, housemasters/mistresses or tutors take the morning registration electronically between 08:30 and 08:45
- Senior School class teachers take the afternoon registration electronically at the beginning of lesson 4 (13:40);
- In the Prep School, class teachers take registrations electronically. KS1 registers are taken at 08:40 and 13.00. KS2 registers are taken at 08.40 and 13.40;
- These registrations are closely monitored by the School Offices and any absences are followed up rigorously.
- In the Senior School, the DSL is automatically informed on a twice daily basis of any incomplete registrations and in the Prep School, the School Office is automatically informed; these are chased immediately;
- Patterns of absence are therefore closely scrutinised by a team of people: the Senior School DSL, housemasters/mistresses, tutors, Prep School class teachers and School Offices;

5. Reporting and referral of a pupil missing from education

Children missing education will be reported to Somerset LSCB

- The School will inform the local authority (Somerset LSCB) of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more. The School will take all reasonable steps to establish the whereabouts of the child. Reasonable steps include: telephone calls to all known contacts, contact with other schools where siblings may be registered, contact with any other service that is known to have contact with the pupil/family. All outcomes and contacts will be recorded on the pupils file;
- The school may refer absences of less than 10 days to the LSCB if the School suspects that such absences are indicators of abuse or neglect;
- All staff are trained to look for and recognise signs of abuse or neglect: frequent or unusual patterns of absence are possible signs and staff are made aware of this;
- Any member of staff who notices unusual patterns of absence must notify the DSL by following normal safeguarding procedures;

6. Other circumstances when the School must report pupil absence

Wellington School will inform Somerset LSCB of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than 4 months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period;
- have been permanently excluded;

Somerset LSCB must be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that the School complies with this duty, so that Somerset LSCB can, as part of their duty to identify:

- Regulation 4 of the Education (Pupil Registration) (England) Regulations 2006; and
- Regulation 12(3) of the Education (Pupil Registration) (England) Regulations 2006.