



## FRAMLINGHAM COLLEGE SAFEGUARDING POLICY

Framlingham College is committed to safeguarding and promoting the welfare of children and young people and requires all staff and volunteers to share this commitment.

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## 1. Introduction

At Framlingham College, the physical and mental health, safety and welfare of the children in our care is at the heart of everything we do and we have an absolute commitment to maintaining our culture of open and effective communication between staff and pupils and our excellent pastoral structures.

The Framlingham College Safeguarding Policy is written in accordance with Suffolk County Council inter-agency procedures. It has been developed in accordance with the Children Acts (1989 & 2004), the Equality Act (2010), the Education Act (2002) and in line with government publications, Keeping Children Safe in Education (KCSIE 2021) and Working Together to Safeguard Children (2018) along with the Sexual Offences Act (2003), the Serious Crime Act (2015), the Counter Terrorism Act (2015) and the Female Genital Mutilation Act (2003) which have been carefully considered to ensure compliance.

Further advice is taken from the following link, as a result of the COVID 19 pandemic:

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/guidance-for-full-opening-schools>

This policy is applicable to the whole school community, including those pupils in the Early Years Foundation Stage (EYFS).

The Governing body takes seriously its responsibility under sections 157 and 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within the College to identify, assess, and support those children who are at risk of harm. Framlingham College works closely with the three safeguarding partners (Suffolk Safeguarding Children Board, NHS Clinical Commissioning Group & the police) to ensure that the welfare and safety of pupils at the College is given appropriate priority (guided by local protocols and arrangements). The DSLs will be the primary point of contacts between the College and our Safeguarding Partners at these times.

At the College, we recognise that all adults, including temporary/supply staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern. *Wherever the word "staff" is used, it covers ALL staff, including support, supply and self-employed staff, contractors, volunteers working with children etc.* All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

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. This includes a duty both to children in need and to children at risk of harm. All staff should read Part 1 of KCSIE and Annex A, whenever a new version is published and demonstrate an understanding of what they have read. All staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

Framlingham College prides itself on its respect for others and mutual tolerance. Parents/guardians have an important role in supporting us. Copies of this policy, together with our other policies relating to issues of child protection 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 urgently, consistently and in accordance with this policy. Open communication is essential.

## 1.1 The aims of the policy

- a) To support the child's development in ways that will foster security, confidence and independence.
- b) To always act in the best interest of the child or young person.
- c) To support Children in Need (as defined and recognised by our Safeguarding Partners).
- d) To provide an ethos of protection and an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- e) To raise the awareness of all teaching and support staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- f) To provide a systematic means of monitoring children known or thought to be at risk of harm, to ensure we, the school, contribute to assessments of need and support packages for those children.
- g) To emphasise the need for good levels of communication between all members of staff.
- h) To develop a structured procedure within the school, which will be followed by all members of the school community in cases of suspected abuse.
- i) To develop and promote effective working relationships with other agencies, especially the police and Social Care.
- j) To provide good lines of communication with trusted adults and supportive friends.
- k) To recognise and protect our children who may be vulnerable to radicalisation or exposed to extremist views.

## 2. Responsibilities

In accordance with the statutory guidance (KCSIE, September 2021), the Governors have appointed the Deputy Heads at both schools (Oliver Lloyd) at the Senior School and Joanna Coventry-King at the Prep School) as DSLs to take responsibility for child protection. The Deputy Heads, as members of the Senior Leadership Team, have the status and authority within the schools to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. Susan Wessels and Jon Slay (FC), James Loveridge (Head of Junior Prep, FCPS), Araminta Long (Head of Pre-Prep, FCPS), Ruth Steggles (Head of EYFS – FCPS) are the DSL's deputies. The DDSLs are trained to the same standard as the DSLs. Both the DSL and DDSL have a job description for their safeguarding roles and key activities.

In the absence of a DSL, the DDSLs will carry out the DSL functions necessary to ensure the on-going safety and protection of pupils. The DSL/DDSL will be available during School hours in person, and in exceptional circumstances by phone. A DSL or DDSL will be available by phone out of hours and during out of term activities.

Ultimately, the DSL and DDSLs will have a complete safeguarding picture within the College and will advise on the response to safeguarding concerns. Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSLs, will consider the context within which such incidents and/or behaviours occur. This is known as **contextual safeguarding**, which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation

and serious youth violence. Consideration of this will enable the school to provide as much information as possible as part of any referral process.

## 2.1 Designated Safeguarding Lead is responsible for:

### Managing referrals

- a) Referring a child to a statutory agency if there are concerns about possible abuse, to the Multi Agency Safeguarding Hub (MASH) and acting as a focal point for staff to discuss concerns. Referrals should be made, following a telephone call, within 24 hours of a disclosure or suspicion of abuse. Note that referrals to statutory agencies do not require parent consent.
- b) Managing the referral outcome in accordance with the advice given by the Safeguarding Partners and their own local protocols for assessment. (Note that once a referral has been made, the Suffolk Safeguarding Children Board are required to follow their own timeframes for response. For example, they will make a decision regarding next steps within one working day and see the child within their own timeframes if the referral requires further assessment).
- c) Engaging and cooperating with our Safeguarding Partners if requested by them (i.e. Framlingham College may be named as a relevant agency)
- d) Liaising proactively with Safeguarding Partners and other agencies as may be required. For example:
  - i. The police (cases where a crime may have been committed or in the case of serious harm). “NPCC - When to call the police” should help the DSL understand when they should consider calling the police and what to expect when they do
  - ii. The local authority – Suffolk Safeguarding Children Board.
  - iii. The local area Clinical Commissioning Group (NHS).
  - iv. Disclosure and Barring Service (in cases where a person is dismissed or has left due to risk/harm to a child)
- e) Keeping the Principal and Governors informed and referring cases to the NSG, Head of Welfare or the full governing body where appropriate.
- f) Acting as a source of support, advice and expertise to all staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- g) Ensuring that either they or the Housemaster/Housemistress/Tutor attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments and the final report, which is shared with the parents.
- h) Liaising with the local authority when necessary and working with other agencies in line with Working Together to Safeguard Children 2018 and attending strategy meetings.

The DSLs at the College understand their role in the new safeguarding partner arrangements (2019). The DSLs will 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 College already has a strong relationship with the Local Area Designated Officer (LADO) and also the Local Community Support Officers, who have delivered pupil talks at both the Prep and Senior School. The Lead Nurse has contact with the NMC, is a member of MOSA, and meets with the School Doctor (with the DSL) on a weekly basis.

As children’s social care assessments now consider where children are being harmed in contexts outside the home, it is important that we provide as much information as possible as part of the referral process. This will facilitate a multi-agency contextual approach. [Here is some advice on contextual safeguarding.](#)

## Training

The DSLs and DDSLs are fully trained for the demands of this role, both in accordance with KCSIE 2021 and as a working set of processes at the College, in child protection and inter-agency working. They regularly attend courses with child support agencies to ensure that they remain conversant with best practice, and they receive appropriate refresher training carried out every two years. This training meets the requirements of the DfE's KCSIE.

The DSL should:

- a) Ensure each member of staff has access to and understands the College's Safeguarding policy and safeguarding procedures, especially new and part time staff. The DSLs are responsible for organising and delivering child protection induction, and update training every 3 years, for all school staff.
- b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- c) Be able to make use of the My Concern software programme to keep detailed, accurate, secure records of concerns and referrals.
  - i. Keeping records of concerns about a child even if there is no need to make an immediate referral.
  - ii. Ensuring that all such records are kept confidentially and securely, separate from pupil records, and are copied on to the child's next school or college.
  - iii. Ensuring that an indication of any other record-keeping is marked on the pupil records i.e. tutor notes on iSAMs or counsellor or medical notes.
- d) Obtain access to resources and attend any relevant or refresher training courses.
- e) Encourage among all staff a culture of listening and taking account of the children's wishes and feelings.

## Raising Awareness

The DSLs should:

- a) Ensure the College's Safeguarding and Child Protection policies are known and used appropriately.
- b) Ensure the College's safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, including by governors.
- c) Ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- d) Link with the Suffolk Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- e) When children leave the School, ensure their child protection file, if any, is transferred to the new school or college as soon as possible (Information must be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child). This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or

college to continue supporting victims of abuse and have that support in place for when the child arrives. Concerns over sharing of information (with regard to the Data Protection Act 2018 and GDPR) must not stand in the way of the need to promote the welfare and protect the safety of children.

- f) Provide, with the Principal and the Safeguarding Governor, an annual safeguarding report for the governing body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and the number of children with child protection plans (anonymised).
- g) Send twice termly emails to staff, updating them on specific safeguarding issues or changes of policy.

## 2.2 The Governors must ensure that:

- a) The School has an appointed DSL with the necessary status, authority and time to fulfil the role effectively and that the Job Description of the DSL meets the requirements in Keeping Children Safe in Education (September 2021).
- b) A designated governor for safeguarding is appointed and their name and contact details are published at the front of this Policy. However, all governors have a safeguarding responsibility.
- c) The School has a written safeguarding policy and procedures that meet statutory requirements and which are reviewed and approved annually by the governors. This policy is made available to parents on the School's website. As part of their annual review, the governors will monitor 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 will approve amendments to safeguarding arrangements in the light of changing regulations or recommended best practice.
- d) All staff have been given a copy of Part 1 and Annex A of Keeping Children Safe in Education (September 2021) and are asked to confirm that they have read it and ensure understanding. it and that further copies are provided to staff as and when it is updated.
- e) All governors receive a copy of Part 1, Part 2 and Annex A of Keeping Children Safe in Education (2021) and are asked to confirm that they have read it and ensure understanding. Governors are encouraged to read part 3 and 4 along with Annex B, C, D and H to ensure that they are fully versed in all areas.
- f) Upon receiving the annual report on safeguarding, the minutes of the review are sufficiently detailed in order to demonstrate the breadth and depth of the review.
- g) The School has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Principal.
- h) The College implements the Recruitment Policy, which includes statutory checks on staff suitability to work with children.
- i) This written safeguarding policy is known and implemented in practice. The Safeguarding Governor will visit the school on a termly basis and will enquire of staff how they understand the policy and how and to who they would pass on their safeguarding concerns.
- j) The DSL, or another designated member of staff, has the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. This would include ensuring that a designated member of staff has responsibility for their welfare and progress and has up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents.
- k) Children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.
- l) Staff undergo regular updated safeguarding training, including online safety which is integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. This should be done regarding the Teachers'

- Standards which set how all teachers manage behaviour effectively to ensure a safe and educational environment, where teachers have a clear understanding of the needs of pupils.
- m) There is an annual review of safeguarding presented to the full governing body.
  - n) All safeguarding policy updates are reviewed by all governors.

As a school with charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available [here](#).

The Governors ensure the facilitation of a whole school approach to safeguarding. This means that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders are to ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

### 2.3 The Principal must ensure that:

- a) The safeguarding policy and procedures are implemented and followed by all staff.
- b) Sufficient time is allocated to the DSLs and the DDSs to carry out their roles effectively.
- c) All staff are able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with Framlingham College's whistleblowing policy.
- d) Pupils' safety (including online safety) and welfare is addressed through the curriculum.

## 3. Supporting Pupils

Where there is a safeguarding concern, Framlingham College will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide (processes will always have the best interests of the pupil at their heart). The College'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 College. All the teaching and medical staff are expected to lead by example and play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health (physical and mental), safety and well-being. All staff have an important role in insisting that pupils always adhere to the standards of behaviour set out in the College's Behaviour and Discipline Policy and in enforcing our Anti-Bullying Policy.

Time is allocated in RSHE, Flow (Life Skills) and tutor periods for discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Time is also allocated to the teaching of Relationships Education, Relationships & Sex Education and Health Education within the RSHE scheme of work. A mental health module has been added to the Year 9 PHSE scheme of work (see the SMSC Guidance document and the updated RHSE Policy and curriculum as of September 2021). Assemblies, Chapel and lessons are used to promote tolerance and mutual respect and understanding. As of KCSIE 2021, the government has issued the following guidance for those teaching RSHE:

[Teaching about Relationships, Sex and Health](#)

[Teaching Online Safety in Schools](#)

[Education for a Connected World](#)

[Sharing nudes and semi-nudes; advice for education settings working with children and young people](#)

[External Visitors Guidance](#)

[Thinkuknow](#)

[Rise Above](#)

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.

At the Senior School, the prefect system is regularly supervised by boarding staff. Prefects 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, prefects are given induction on appointment which includes how to contribute to the school's anti-bullying policy, how to respond to allegations of serious bullying or abuse, and how to act if they hear allegations of abuse.

A "Child in Need" refers to a pupil whose circumstances may require them to have extra support in order to live a life which does not compromise their ability to fulfil their potential. The College will refer to external agencies such as CAMHS (Child and Adolescent Mental Health Service) or Suffolk County Council's Children's Social Services for advice and support.

A "Child at Risk" is a pupil who is in immediate risk of significant harm and such cases will be referred to the MASH as a matter of urgency.

We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that the College may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Where reasonably possible, the College holds more than one emergency contact number for each pupil. This goes beyond the legal minimum.

Framlingham College supports all pupils by: Providing access to a telephone helpline enabling them to call for support in private.

- b) Providing every child with information on where to turn for advice, including confidential help lines and web addresses for external specialists such as ChildLine, Kidscape, Get Connected and the Samaritans.
- c) Displaying advice in the Medical Centre and Houses on where pupils can seek help.
- d) Providing leadership training to our prefects, peer mentors and senior pupils which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
- e) Providing regular lessons to pupils on safeguarding, including online safety, whilst ensuring that all pupils understand and adhere to the school's guidelines in this area. These lessons include guidance on educating pupils how to stay safe, including online safety and online protection. More details on cyber-bullying are found in the school's anti-bullying policy.

- f) Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst rejecting aggression or bullying.
- g) Promoting a caring, safe and positive environment within the school.
- h) Liaising and working together with all support services and those agencies involved in the safeguarding of children.
- i) Notifying Social Care as soon as there is a significant concern.
- j) Providing continuing support to a pupil about whom there have been concerns who then leaves the school by ensuring that appropriate information is copied under confidential cover to the pupil's new school or FE College and ensuring the school medical records are forwarded as a matter of priority. Information must be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. The DSL/DDSL can share personal information ("special category personal data") without consent if it is not possible to gain consent, if it cannot be reasonably expected that the DSL/DDSL will gain consent, or if to gain consent would place a child at risk.

#### 4. Supporting Staff and Staff responsibilities

Framlingham College recognises that Staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

All Staff are required to notify the College immediately if there are any reasons why they should not be working with children.

The Principal or DSL will disclose information about a pupil to other members of staff on a strict need to know basis. *Guidance about sharing information, can be found in the booklet "What to do if you are Worried a Child is being Abused" (March 2015) [www.gov.uk](http://www.gov.uk)*

If staff have **any concerns** about a child's welfare, they should act on them immediately via the College's safeguarding processes (incl. My Concern) and speak to the DSL, who will then take the lead on this case. All staff must be aware that they have a professional ability to share information with other agencies in order to safeguard children. Staff should know to not allow concerns over the sharing of information (with regard to the Data Protection Act 2018 and GDPR) to stand in the way of the need to promote the welfare and protect the safety of children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

All staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has poor mental health;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- Is at risk of modern slavery, trafficking or exploitation;

- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; is misusing drugs or alcohol themselves;
- has returned home to their family from care; is a privately fostered child.

The DSL will take the lead on early help cases, liaising with other agencies as appropriate.

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

All staff must be aware that as a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in educational 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 to 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 must report and record any incident carrying this potential.

## 5. Staff Training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. Safeguarding is the responsibility of all members of staff and all staff should know what to do to raise a concern.

The depth and detail of training needed by different groups of staff will vary according to the nature of their role and the extent of their involvement with children.

Staff are kept up to date with the changes in Safeguarding and are expected to complete any related training or read relevant documents to ensure compliance.

New staff (including temporary staff), volunteers and governors will receive training during their induction. Induction training will include:

- Familiarisation with this safeguarding policy document
- Child Protection Policy
- Pupil Behaviour Policy
- Staff Behaviour Policy
- Safeguarding response to pupils who go missing from education
- Whistleblowing Policy
- The identity and role of the DSLs and DDSLs

- ICT Usage and Internet Policy for Staff
- Social Media Policy
- Part 1 and Annex A of Keeping Children Safe in Education as well as any updates to Part I of the guidelines.

All staff, including the Principal, will receive full formal safeguarding training no less than every three years and in accordance with the requirements of the Suffolk Safeguarding Children Board. They will also receive updates at least annually and as necessary. The DSL and the DDSL's will have DSL training every two years.

Staff training will also include alerting staff to the risks of radicalisation as set out in the Prevent Duty. Training in the Prevent Duty will include knowing how to identify children and young people at risk.

## 6. What is child abuse?

To ensure that our pupils are protected from harm, all staff need to understand what types of behaviour constitute abuse and neglect. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. The warning signs and symptoms of child abuse and neglect can vary from child to child. Children develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused. There are four categories of abuse (See 'What to do if you're worried a child is being abused – Advice for Practitioners' March 2015 DfE Guidance):

### 6.1 Physical abuse

Physical abuse is deliberately physically hurting a child. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Children may also suffer domestic abuse in an intimate personal relationship. Support is signposted in Annex A of KCSIE 2021

Babies and disabled children also have a higher risk of suffering physical abuse.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment.

#### **Some of the following signs may be indicators of physical abuse:**

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained:
  - bruises or cuts;
  - burns or scalds; or
  - bite marks

## 6.2 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development. Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child. Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.

**Some of the following signs may be indicators of emotional abuse:**

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Staff are increasingly aware that children are at risk from, or may find themselves involved in, serious crime. The indicators for such involvement will be an increased absence from school, a change in friendship groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing. Advice for schools is provided in Annex A of KCSIE 2021 and in the Home Office's ***Preventing Youth Violence*** and ***Gang Involvement and its Criminal Exploitation of Children and Vulnerable adults: County Lines*** guidance.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Sexual abuse is any sexual activity with a child. Many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children. **CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of the on social media.**

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

**Further information about CCE including definitions and indicators is included in Annex B of KCSIE 2021.**

**Some of the following signs may be indicators of sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that one wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (DfE February 2017). 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 don't take part in education.

Increasingly all staff should be aware of the indicators of serious violence as well. This may be where the child is a victim or where the child is caught up in criminal activity and they are the perpetrator. These may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing;
- Unexplained gifts or new possessions that suggest they may have been approached or are part of a criminal networks or gangs and may be at risk of exploitation.

All staff must be aware of the risk factors of being involved in serious violence such as:

- Being male;
- Having been frequently absent or permanently excluded from school;
- Having experienced maltreatment and having been involved in offending (theft and robbery)

These links provided further information:

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

## 6.4 Neglect

Neglect is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child's health or development. Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action. However, while one may be concerned about a child, neglect is not always straightforward to identify. Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

**Some of the following signs may be indicators of neglect:**

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;

- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

## 6.5 Special Educational Needs and Disability

All staff also need to be alert to the specific needs of those pupils who have 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.

## 7. Other safeguarding issues

Staff are 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, truanting, gender-based violence and sexting (the sharing of nude and semi-nude images) also put children in danger. The College acknowledges that there may be lower-level concerns that still require handling, even if they do not meet the harm threshold. The College has a culture in which all concerns about adults are shared and policies and processes are in place to deal with these concerns as laid out in Part 4: Section 2 of KCSIE 2021.

### 7.1 Peer on peer abuse

Framlingham College recognises that all children are capable of abusing their peers and all staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. Staff should be clear that abusive comments and interactions should not be treated as mere banter and may represent safeguarding concerns. It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below. Staff should never dismiss this behaviour as just having a laugh, banter, part of growing up or boys being boys, as these leads to a culture of unacceptable behaviours that can allow abuse to manifest itself as part of the culture of the school.

All staff should understand, that even if there are no reports of abuse it does not mean it is not happening. It may be that it is simply not being reported. Therefore, it is very important that if staff have any concerns regarding peer on peer abuse they should speak to the DSL or DDSL.

This is most likely to include, but not limited to: bullying (including cyber-bullying), physical abuse, gender based violence (it is more likely that girls will be the victims and boys the perpetrators)/sexual assaults/sexual violence (such as rape, assault by penetration and sexual assault including online behaviours that encourage this sort of abuse) and sexual harassment (such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand alone or persistent), sexting and initiation type violence and rituals. Upskirting is a recent addition to this list (2019) and is a criminal offence. This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. Further information on upskirting is provided in KCSIE 2021. All staff, but particularly boarding staff, are to be aware of initiation/hazing type violence and rituals both in school and online, and challenge this behaviour if it is apparent. UKCIS guidance now states that all staff should be aware of issues surrounding the sharing or nude or semi-nude images and videos by

pupils as a sign that pupils are at high risk. As a school that provides accommodation, we are alert to the signs of these risks and abuse in these settings.

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 School's Behaviour and Discipline Policy.

A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation. The College will take advice from the Suffolk Children Safeguarding Board (SCSB) 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 College will ensure that, subject to the advice of the SCSB, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult (DSL, DDSL or other senior member of staff) and until the investigation is completed. Confidentiality will be an important consideration and advice will be sought as necessary from the SCSB or police as appropriate.

Victims and perpetrators of peer-on-peer abuse will be offered support by the School, as appropriate e.g. through counselling and other professional services.

For further clarity regarding the above KCSIE 2021 identifies the following different forms of peer-on-peer abuse:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual Violence and sexual harassment – refer to KCSIE and UKCIS guidance;
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Upskirting (which is a criminal offence);
- Initiation/hazing type violence or rituals.

### **Framlingham College's response to peer-on-peer sexual violence and sexual harassment.**

All staff acknowledge that sexual violence and sexual harassment can take place both in and outside of the College as well as online. The College also acknowledges that it may go on without us knowing and that it is particularly prevalent and widespread amongst today's young. All staff are aware that it may not be something that pupils choose to tell staff about and we therefore adopt a pro-active and 'it could happen here' approach where staff and senior pupils in leadership positions are encouraged to pass on anything they may overhear or may be indicative in certain behaviours of children in the College environment.

At Framlingham College we take an approach that sees everyone challenging and calling out any kinds of sexual violence or harassment so that it makes clear the culture that we wish this generation and future generations to enjoy. Only if we tackle this behaviour can we move forward in our mission. We also acknowledge the impact of 'Everyone's Invited' in bringing this to our attention and we are committed to regularly monitoring and reviewing our reactions to this behaviour.

In line with government guidance Framlingham College takes a zero-tolerance approach and decisions will be made on a case-by-case basis, with the DSL taking the lead. The following provides a strong framework around which the DSLs and their teams will operate.

The Disclosure/report to a member of staff:

- All victims will be reassured that they are being taken seriously and will be kept safe.
- A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.
- No pupil should ever be made to feel ashamed for making a report.
- Staff should not promise confidentiality to the pupil at the disclosure stage.
- The staff member will write up a thorough summary of the report/disclosure – only recording the facts as presented.
- The staff member should inform the DSL or DDSL as soon as practically possible.

#### Reporting a case through a whistle-blowing system

We have developed a system where anyone can report a case of abuse through our portal. This is well promoted and easily understood.

Risk Assessment:

- The DSL will carry out an immediate risk assessment (RA), considering the safety and support of the victim, the alleged perpetrator and all other children at the school.
- The RA should be considered a live document.
- The DSL will engage with our Safeguarding Partners (e.g. the police) as required.

Action following the report/disclosure:

The DSL will consider:

- The victim's views on how the investigation should be progressed.
- The nature of the alleged incident.
- The ages of the children involved.
- Any power imbalance between the children.
- If the incident is a one-off or a sustained pattern.
- If there are ongoing risks to the victim or other children.
- If there are other related issues and wider context (contextual safeguarding).
- The proximity between perpetrator and victim, during the fact-finding stage.

Further considerations:

- The DSL may manage the incident internally through utilising behaviour and bullying policies.
- The DSL may decide that the child or children may benefit from early help, particularly in the case of non-violent harmful sexual behaviour. Full details of early help can be found in Chapter1 of Working Together to Safeguard Children 2018.
- Where a child has been harmed, as at risk of harm or in imminent danger, the school should make a referral to children's social care and follow subsequent advice/guidelines. This will involve reporting to the police. Any delays in the criminal process, bail conditions and the conclusion of the criminal process will all need attention and management.

Ongoing response:

- Long term support should be in place for the victim. There are many providers of support, including CAHMS, Rape Crisis and Survivors Trust. The victim may choose to have a designated trusted adult at school (DSL, tutor).

- Protect the victim from any subsequent bullying or harassment.
- The transfer of information should the victim move to a new school.
- Long term support for the perpetrator (including the transfer of information to a new school).

## 7.2 Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy. Myconcern will be the reporting tool for such concerns.

The Department of Education has published advice and guidance on [Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools](#) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

Framlingham College staff can access a range of advice to help them identify children in need of extra mental health support. This includes working with Teen Tips and other external agencies. [Here are some useful links as advised in KCSIE 2021](#). Click here for [Rise Above, which has also been created Public Health England to help promote positive mental wellbeing](#).

Other guidance in this important area is as follows:

[Promoting and supporting mental health and wellbeing in schools and colleges.](#)

[Every Interaction Matters](#)

[Education recovery support \(Post Covid\)](#)



Personal Crisis:	the pupil may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
Personal Circumstances:	migration; local community tensions and events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
Unmet Aspirations: rejection of civic life.	the pupil may have perceptions of injustice; a feeling of failure;
Experiences of Criminality: or reintegration.	involvement with criminal groups, imprisonment, poor resettlement
Special Educational Need:	pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

Pupils who are vulnerable to radicalisation may also be experiencing:

Substance and alcohol misuse  
Peer pressure  
Influence from older people or via the Internet  
Bullying  
Domestic violence  
Race/hate crime

Behaviours which may indicate a child is at risk of being radicalised or exposed to extremist views could include:

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Pupils accessing extremist material online, including through social networking sites;
- Possessing or accessing materials or symbols associated with an extremist cause;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Pupils voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause;
- Changing in style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause;
- Using insulting to derogatory names for another group;
- Increase in prejudice-related incidents committed by that person – these may include:
  - physical or verbal assault
  - provocative behaviour
  - damage to property

- derogatory name calling
- possession of prejudice-related materials
- prejudice-related ridicule or name-calling
- inappropriate forms of address
- refusal to co-operate
- attempts to recruit to prejudice-related organisations
- condoning or supporting violence towards others.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance;
- Partner schools, local authority services, and police reports of issues affecting pupils in other schools.

Contact details for support and advice on the Prevent Duty can be found in Annex A of KCSIE 2021 and below.

The Home Office statutory Prevent duty guidance (2015) can be accessed on:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

The Department for Education non-statutory Prevent duty guidance (2015) 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:

[https://www.elearning.prevent.homeoffice.gov.uk/channel\\_awareness/01-welcome.html](https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html)

#### 7.4 Honour Based Abuse (HBA – Forced Marriage and FGM)

HBA can include forced marriage and Female Genital Mutilation (FGM). This term recognises both violent and non-violent forms of abuse. All staff will be alert to possible indicators of HBA and should contact the DSL as a matter of urgency if they are made aware or are concerned about any child or young person.

Guidance on the warning signs of HBA can be found on pages 38-41 of the Multi-agency statutory guidance of FGM, which can be accessed on:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Multi-agency guidelines on handling cases of forced marriage on pages 13-14 can be accessed on:

<https://www.gov.uk/guidance/forced-marriage>

Female Genital Mutilation (FGM) is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth. FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

#### Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

#### Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

#### Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and looking uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a legal duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this

will usually come from a disclosure and staff should speak to the DSL (or DDSL) immediately. The duty does not apply in relation to at risk or suspected cases or in cases where a woman is 18 or over. In these cases teachers should follow safeguarding procedures.

### 7.5 Children Missing from Education

The College will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. Knowing where children are during school hours is an extremely important aspect of safeguarding. Missing school can be an indicator of abuse and neglect and may raise concerns about child sexual exploitation. For further details, please see the School's Missing Pupil policy.

### 7.6 Visiting Speakers

On occasions visiting speakers will come into the School to address pupils. We welcome different insights and perspectives from visitors to the School. Visiting speakers will however be briefed with regards to our expectations of what is suitable. Speakers will be reminded not to encourage any form of extremism or radicalisation. Speakers will be reminded that pupils are impressionable and that they need to be respectful of the College support of British values. Where appropriate, the College will request that visiting speakers provide copies of any materials they will use in advance of the visit.

### 7.7 Use of College premises for non-College activities

Framlingham College ensures that appropriate arrangements are in place to keep children safe when the College lets out its facilities or when it runs activities itself for external people. We will be guided by our own safeguarding and child protection policy in this instance.

When services are provided by other external agencies on our site then it is responsibility of that agency to ensure that appropriate safeguarding and child protection measures are in place. The governing body are to ensure that this is part of the lease agreement as a condition of use. Any failure to comply with this would lead to termination of the agreement.

## 8. Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. This vulnerability also applies to previously looked-after Children. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

Staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## **9. Safer Employment Practices**

The College follows the Government's recommendations for the safer recruitment and employment of staff who work with children, acting at all times in compliance with the Independent School Standards Regulations.

In line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2018), the College 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 personnel have been suitably vetted in line with legal requirements.

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 directions, sanctions 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. Under KCSIE 2021 schools may now use a birth certificate to check a person's identity.

The College is aware of its duty to refer staff to the DBS who are suspended or redeployed because of concerns that they pose a risk of harm. This will happen as soon as possible, and ordinarily on the conclusion of an investigation.

The College is aware of its obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least

until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The College ensures that at least one of the persons who conducts an interview has completed safer recruitment training.

All governors, volunteers, agency staff 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 personnel employed by another organisation and working with the College's pupils at either school or on another site. Should the College 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.

Where a teacher has been dismissed or we cease to use the services of a teacher because of serious misconduct, or they might have dismissed because of serious misconduct, or we might have dismissed them or ceased to use their services had they not left first, the College **MUST** consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details for how to do this can be found [here](#).

Please also refer to the College's Staff Recruitment Policy and Procedure for further details.

## **10. Use of Mobile Phones and Cameras (Early Years Foundation Stage)**

The College accepts that employees will bring mobile phones to work. Teachers and teaching assistants are requested to leave their phones in a safe place and turned to silent or switched off. Mobile phones will not be used during any time in which the teacher or teaching assistant is working with or supervising children. Should a teacher or teaching assistant need to use their phone to make or receive a call other than during their designated break period, then permission should be sought from their line manager to enable them to have access to their phone. The phone must not be brought into an area with children. There is landline provision for staff to make calls if needed during the day and in an emergency staff can be contacted through the school office. Under no circumstances are staff to use the camera on their mobile phone or any other recording equipment to take photographs of the children. The staff can use the camera provided by the school to take photographs for the purpose of recording children's activities and their progress. These photographs may only be stored and used in accordance with the school's policy which outlines the shared files on the school system where photographs may be stored.

## **11. Online Safety**

KCSIE 2021 states that it is essential that children are safeguarded from potentially harmful and inappropriate online material.

All staff should be aware that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The College's approach to the updated KCSIE 2021 post covid is reflected in the child protection policy as well, but it is important to acknowledge here that all staff are aware that in a world of mobile communications and smart technology children can gain unrestricted access to the internet through 3G, 4G and 5G networks and that some students will use VPNs as well.

### Remote Learning

Where children are being asked to learn online at home the Department of Education has provided the following advice:

#### [Safeguarding and Remote Education](#)

#### [NSPCC](#)

#### [PSHE Assoc.](#)

The College will ensure that:

- appropriate filters and monitoring systems are in place to keep children safe online. The College's filtering system is Lightspeed. This 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;
- parents have access to resources about online safety via a Digital School Online Membership
- children are taught about safeguarding, including online; and
- staff are equipped with the knowledge to safeguard children online by attending online safety training.
- online resources as listed in KCSIE 2021 will continue to be accessible to the E-Safety Leads and this is reflected in our delivery of this, both as part of the PHSE curriculum and in our general management of online safety. The PHSE Association guidance is of particular support to the Senior School. The school also subscribes to Parent Zone.

The School's ICT and Internet Usage Policy as well as the Mobile Phone Usage Policy also set out the School's approach to online safety. Additional information is available in Annex C of KCSIE 2021 on how to support keeping children safe online when they are learning at home.

## **12. Procedures for Staff to deal with concerns or suspicions of abuse or neglect**

Framlingham College 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 staff are made aware of their duty to safeguard and promote the welfare of children in the College's care. Staff are alerted to the particular potential vulnerabilities of looked-after children.

Framlingham College 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 DSL may consult with the child concerned and the parents regarding a referral to external agencies (such as children's social care). This may lead to a plan to support a child in need being drawn up or an early help assessment, such as the Common Assessment Framework (using an Assessment and Request for Service or ART Form) being carried out. In either case, the School will liaise and take advice from external agencies as appropriate. The DSLs will always attend CIN Meetings and record minutes of these meetings on My Concern. All cases will subsequently be discussed at the weekly DSL/DDSLs Meeting, as a matter of course. KCSIE 2021 offers further information for schools on how to support children in need (paragraph 112, page 28, & Annex B).

If a member of staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to their attention it is their duty to listen to the child, to provide reassurance 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, supply, contract and volunteer staff working in the College, should immediately 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 and signed 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 Suffolk Safeguarding Children Board. Staff should not allow concerns over sharing of information (with regard to the Data Protection Act 2018 and GDPR) to stand in the way of the need to promote the welfare and protect the safety of children.

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.

In boarding schools, staff need to be aware that children can be particularly vulnerable and that schools should be alert to pupil relationships and the potential for peer abuse.

If staff members are unsure about whether or not a referral should be made, they should speak to the DSL. The DSL will contact either the LADO or the MASH for advice or direction.

In relation to EYFS, 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 the LADO within 24 hours.

Borderline cases will be discussed with the LADO without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern meets the relevant threshold and decide what further steps should be taken. This could involve calling the police.

Where the outcome of a referral is not reported back to the referring member of staff or DSL and/or where a child's situation does not appear to be improving, the College 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.

College staff 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, Framlingham College will co-operate with Channel panels and the Police with assessments that are being undertaken.

In the case of pupil-on-pupil abuse which the College has reported to the LADO and which the LADO or statutory child protection authority decides to investigate further, the matter will be dealt with under the School Behaviour and Discipline Policy after discussion with the LADO.

Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must firstly raise this with the Principal or DSL without delay. The Principal or DSL will consult with external agencies, as appropriate in accordance with this policy. 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 all safeguarding concerns to the Principal (provided they are not concerning the Principal).

### Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. Information is kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Framlingham College uses Myconcern to record any incidents of Safeguarding or Child Protection and each child has their own file for this purpose. All relevant people have access to this file.

### Information Sharing

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

Important Contact details are as follows:

**The School's points of contact for children who are the focus of concern are as follows:**

**Suffolk Safeguarding Children Board**

website for child protection: [www.suffolkscb.org.uk](http://www.suffolkscb.org.uk)

**Local Area Designated Officer (LADO)**

Central Telephone Number: 0300 123 2044 (choose South Area)

Email: [ladocentral@suffolk.gcsx.gov.uk](mailto:ladocentral@suffolk.gcsx.gov.uk)

**The School's points of contact for children who are in need of help are as follows:**

**Suffolk Multi Agency Safeguarding Hub (MASH) Professional Consultation line**

Tel: 03456061499

**Customer First (immediate safeguarding concerns)**

Tel: 0808 800 4005 (24 hours)

**Police Emergency**

999

**Police Non-Emergency**

101

**OFSTED Safeguarding Children**

0300 123 1231 (Monday to Friday from 8am to 6pm)

[Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

**Female Genital Mutilation**

Contact: Rohma Ullah

Email: [rohma.ullah@barnardos.org](mailto:rohma.ullah@barnardos.org)

**Extremism**

Department for Education dedicated helpline for staff and governors:

Tel: 020 7340 7264

Email: [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

**Other useful contacts**

**Disclosure and Barring Service**

PO Box 181, Darlington, DL1 9FA.

Tel: 03000 200 190

**Department of Education and the Teaching Regulation Agency**

<https://www.gov.uk/government/organisations/teaching-regulation-agency/about#who-we-are>

The Customer First and the OFSTED Safeguarding Children contact details are all displayed in the EYFS Classrooms as required, so that parents are aware of whom to contact if they have any concerns about a child.

### **13. Procedures for managing allegations against staff, volunteers and the Principal**

The College's procedures for dealing with allegations against staff (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 DSL will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst such an allegation is being investigated or considered.

The DSL will liaise with the LADO, police and social services as to managing confidentiality as appropriate. The College's procedures for managing allegations against staff (including the Principal and DSL) and volunteers follows Departmental guidance and Suffolk Children's Safeguarding Board arrangements and apply when staff, including volunteers, have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil;
- Possibly committed a criminal offence against or related to a pupil; or
- Behaved towards a pupil in a way that indicated that they would pose a risk of harm if they were to work regularly or closely with children: or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Should the allegation of abuse be made against a member of staff, supply teacher (see KCSIE 2021, paragraph 214-217) or a volunteer, the member of staff should immediately inform the DSL. Should the allegation of abuse concern the DSL, the member of staff making the allegation should inform the Principal and a DDSL who will have responsibility for the matter in the place of the DSL. Should the allegation be against the Principal or a governor, the DSL will immediately inform the Chair of Governors. Where an allegation is against the Principal, the Principal must not be informed of the allegation prior to contact with the Chair and the LADO. It will be the Chair's responsibility to contact the LADO.

In all cases, the individual against whom the allegation has been will be informed immediately 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. Framlingham College will always appoint a member of staff to keep the person informed of the likely course of action and the progress of the case (as far as is allowable in accordance within the statutory guidelines) and to help manage and monitor their wellbeing. In such cases, a school counsellor or the College Chaplain are often used.

If the LADO or any of the statutory child protection agencies decide to take the case further, any staff member concerned may be suspended by Framlingham College 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 so suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children. Framlingham College 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 conclusion of an investigation (internal or external) 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 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.

During the course of the investigation, Framlingham College, 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 (September 2021) 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. Similarly, allegations against a teacher who is no longer working at the School will also be referred to the police.

Any pupils who are involved will receive appropriate care.

Staff should also have regard to the Staff Behaviour Policy to minimise the risk of allegations being made.

#### **14. Whistle-blowing**

If staff have concerns about poor or unsafe practices or potential failures in the College's safeguarding practices, these should be raised in accordance with Framlingham College's confidential reporting (Whistleblowing Policy) set out in the Staff Handbook. 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 feel unable to raise an issue with the College or that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline (Tel: 0800 0280285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)).

#### **15. External Referrals**

Framlingham College follows Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions as well as 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, all 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 that a member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The DSL will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a pupil) whose services are no longer used because they are 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, Framlingham College 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 it is found there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

As a member of the Boarding Schools' Association (BSA), the College is requested to inform the BSA of safeguarding cases and their Commitment to Care Charter suggests the following:

'Recent cases: BSA only needs to know about safeguarding cases which have resulted in a full referral to an external body such as the local authority or the police AND where the case relates to a member of staff or to abuse by one pupil on another (peer on peer). The practical advice here is that a standard conversation with a LADO (or equivalent) which leads to a decision not to take any action does not need to be reported. However, if the case or allegation is going to be further investigated and/or 'referred to the Charity Commission' as a serious incident report then we would like to be aware of it. Clearly not every member school is a charity, but we hope those which are not will be able to apply the same sort of threshold test.'

'Non-recent cases: It would be helpful for BSA to receive information on any non-recent cases currently being investigated by the police.'

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

## **16. Monitoring and Evaluation of the Safeguarding Policy**

Framlingham College monitors and evaluates its safeguarding policy and procedures through the following activities:

- Half-termly Safeguarding group meetings (including Safeguarding Governor)
- Monthly updates from solicitors - Veale Wasborough Vizards.
- Half termly Housemaster/Housemistress meetings
- Termly Welfare Governor Group Meetings
- Pupil surveys and questionnaires
- Regular review of training offered to staff, including online safety training
- Safeguarding Logs and files
- 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
- Logs of bullying and/or racist behaviour incidents are reviewed by the senior leadership team and the governors
- 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

**17. Other related policies (accessible on Sharepoint's Policy, Inspections and Governance Page)**

- Anti-bullying Policy
- Staff Behaviour Policy
- Confidential Reporting (Whistleblowing Policy)
- Health and Safety Policy
- Guidance on the use of Force to Control and Restrain Pupils
- Missing Child Policy
- ICT Usage and Internet Policy for Pupils and Staff (separate documents)
- Staff Recruitment Policy
- Rewards and Sanctions Policy
- Behaviour and Discipline Policy
- Complaints Procedures