POLICY FOR CHILD PROTECTION AND SAFEGUARDING

Manchester High School for Girls Senior School and Preparatory Department, including the Early Years Foundation Stage (EYFS) and out of school hours' activities and care.

Contents

School Contacts 3
External Contacts 4
Summary: Actions when there are concerns about a child. 6
Summary: Actions once a referral has been made to children's social care. 7
Introduction 8
Definitions and terms used in this policy 9
Aims 12
Safeguarding Children and Whistle Blowing 13
Key responsibilities of all governors, staff and volunteers 14
Management of safeguarding practice 15
Responding to a disclosure - quick reference guide for staff, governors, contactors and volunteers 17
Follow-up to a disclosure or raising of a concern 18
Early Identification, Early Help and Family Help 20
Child-on-Child Abuse (including Managing Sexual Violence and/or Sexual Harassment Between Children) 22
Managing Online safeguarding and the making and sharing of nudes or semi-nudes 25
Online Safety 26
Mobile Phones and Devices 27
Escalation procedures 27
Child Protection Records 28
Leavers / Withdrawal from the School 28
Attendance / Missing From Education 29
Guardianship 29
Managing Allegations of Abuse Against Adults in the School: staff, supply staff, trainee teachers, volunteers and contactors. (see also Appendix 5 on Page 52) 30
Restrictive Interventions 30
One-to-one Teaching 31
Communication with Parents 31
Looked After Children (Children in Care) 31
Staff Training, Including Induction Procedures 32
Safer Recruitment Procedures 33
Disqualification 33
Homestay during exchange visits 33
Monitoring the effectiveness of the policy and procedures 33

Appendix 1: Abuse, Neglect and Exploitation and Vulnerable Children 35
Appendix 2: Looked After Children 51
Appendix 3: Specific Responsibilities 53
Appendix 4: Role of the DSL 57
Appendix 5: Managing Allegations against Adults 59
Appendix 6: Safer Recruitment Processes 69
Appendix 7: Log of concern about a child's welfare (for non-CPOMS users) 74

School Contacts

Concerns related to Child Protection should be referred to one of the Designated Safeguarding Leads.

Safeguarding Mailbox Mailbox monitored by all DSLs and Deputy DSLs listed below.	Senior School and Sixth Form: Safeguarding@mhsg.manchester.sch.uk Preparatory School: Prepsafeguarding@mhsg.manchester.sch.uk
Designated Safeguarding Lead (DSL) **Senior School** Miss Diana Bruce, Deputy Head (Pastoral)	Email: dbruce@mhsg.manchester.sch.uk Tel: 0161 224 0447 ext 204
Designated Safeguarding Lead (DSL) **Preparatory Department including Early Years** Mrs Sam Gibbons Head of the Preparatory School	Email: sgibbons@mhsg.manchester.sch.uk Tel: 0161 249 2243 ext 285
Deputy Safeguarding Lead (Deputy DSL) **Senior School** School Nurse, Janet Bamford Mrs Penny Scott, Head of Lower School Mrs Jane Burley, Head of Middle School	Email: nurses@mhsg.manchester.sch.uk Tel: 0161 224 0447 ext 219 Email: pscott@mhsg.manchester.sch.uk Tel: 0161 224 0447 ext 227 Email: jburley@mhsg.manchester.sch.uk Tel: 0161 224 0447 ext 225
Deputy Safeguarding Lead (Deputy DSL) **Preparatory Department Including Early Years** Mrs Ruth Anderson, Assistant Head Mrs Jessica Bingham Assistant Head	Email: randerson@mhsg.manchester.sch.uk Tel: 0161 2492243 ext 300 Email: jbingham@mhsg.manchester.sch.uk Tel: 0161 2492243 ext 300
Lead Safeguarding Governor and Governor for Looked After Children Mr Andy Smith	Can be contacted via the School Email: administration@mhsg.manchester.sch.uk Tel: 0161 224 0447
Head Mistress Mrs Helen Jeys	Can be contacted via the School Email: administration@mhsg.manchester.sch.uk Tel: 0161 224 0447
Chair of Governors Sarah Ramsbottom	Can be contacted via the School Email: administration@mhsg.manchester.sch.uk Tel: 0161 224 0447

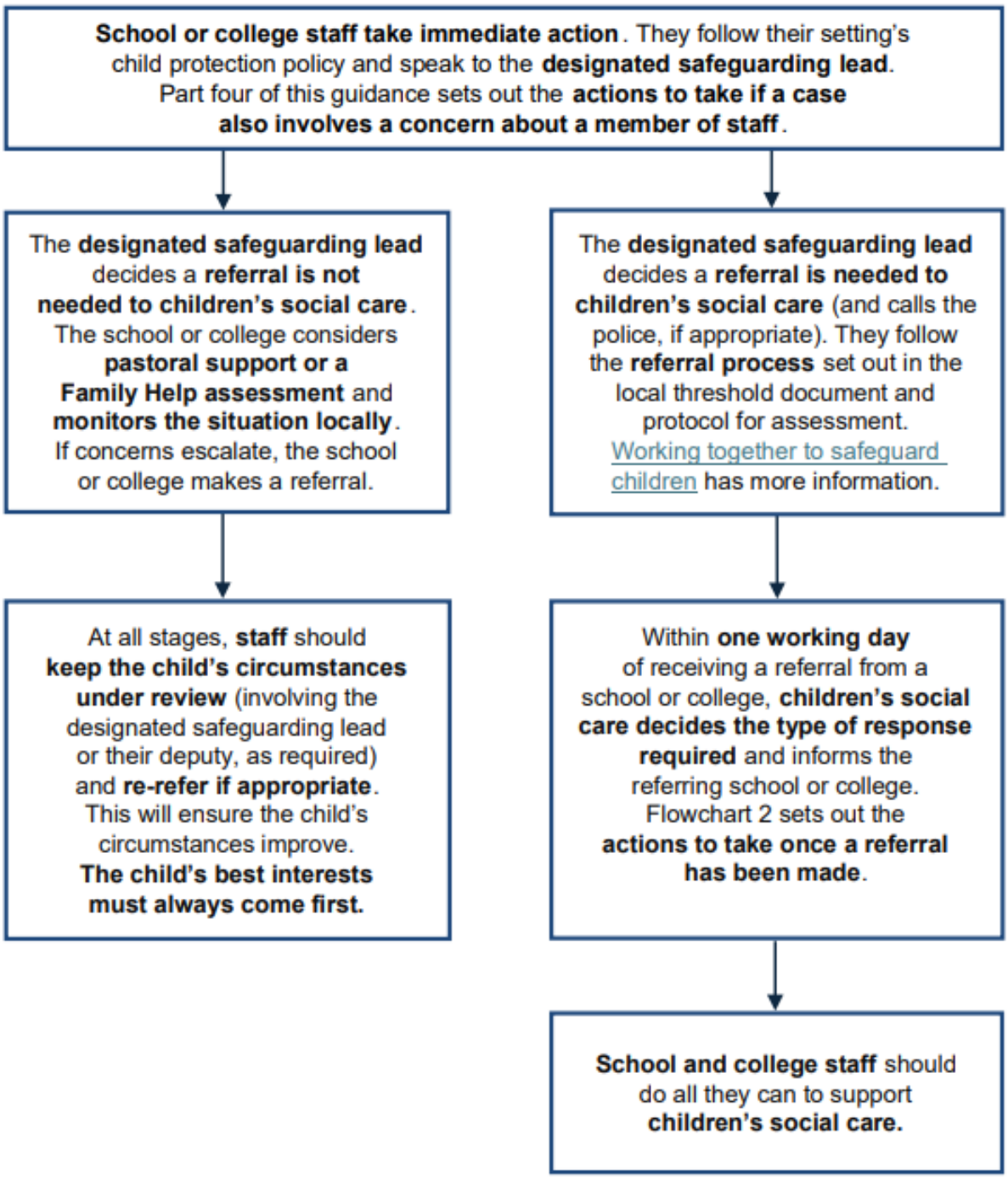
Both the DSL and the Deputy DSLs will liaise with each other and with the Head Mistress.

External Contacts

Local Authority	**Children's Social Care**
Manchester	Tel: 0161 234 5001
Bolton	Tel: 01204 331500
Bury	Tel: 0161 253 5454
Cheshire East	Tel: 0300 123 5012 (office hours) 03001235022 (out of hours)
Oldham	Tel: 0161 770 3790
Rochdale	Tel: 0300 303 0440 (office hours) 0300 303 8875 (out of hours)
Salford	Tel: 0161 603 4500 (office hours) 01617948888 (out of hours)
Stockport	Tel: 0161 217 6028 (office hours) 01617182118 (out of hours)
Tameside	Tel: 0161 342 4101
Trafford	Tel: 0161 912 5125
Wigan	Tel: 01942 828 300
Other Key Agencies	
Channel and Prevent	Tel: 0161 856 6345 Email: channel.project@gmp.police.uk AND mcsreply@manchester.gov.uk
Childline	Tel: 0800 1111 www.childline.org.uk
Forced Marriage Unit	Tel: 020 7008 0151 fmu@fcdo.gov.uk
Local Authority Designated Officer (LADO):	Tel: 0161 234 1214 MCC Designated Officer Referral Form Email: LADO@manchester.gov.uk
Manchester Family Information Service	Tel: 0800 083 7921
Manchester Prevent and Community Cohesion Co-ordinator	Tel: 0161 234 1489
Manchester Safeguarding Partnership (MSP)	Tel: 0161 234 5001 (MSP) mcsreply@manchester.gov.uk
NSPCC 24/7 Helpline	Tel: 0808 800 5000 link: NSPCC helpline
NSPCC FGM Helpline	Tel: 0800 028 3550 fgmhelp@nspcc.org

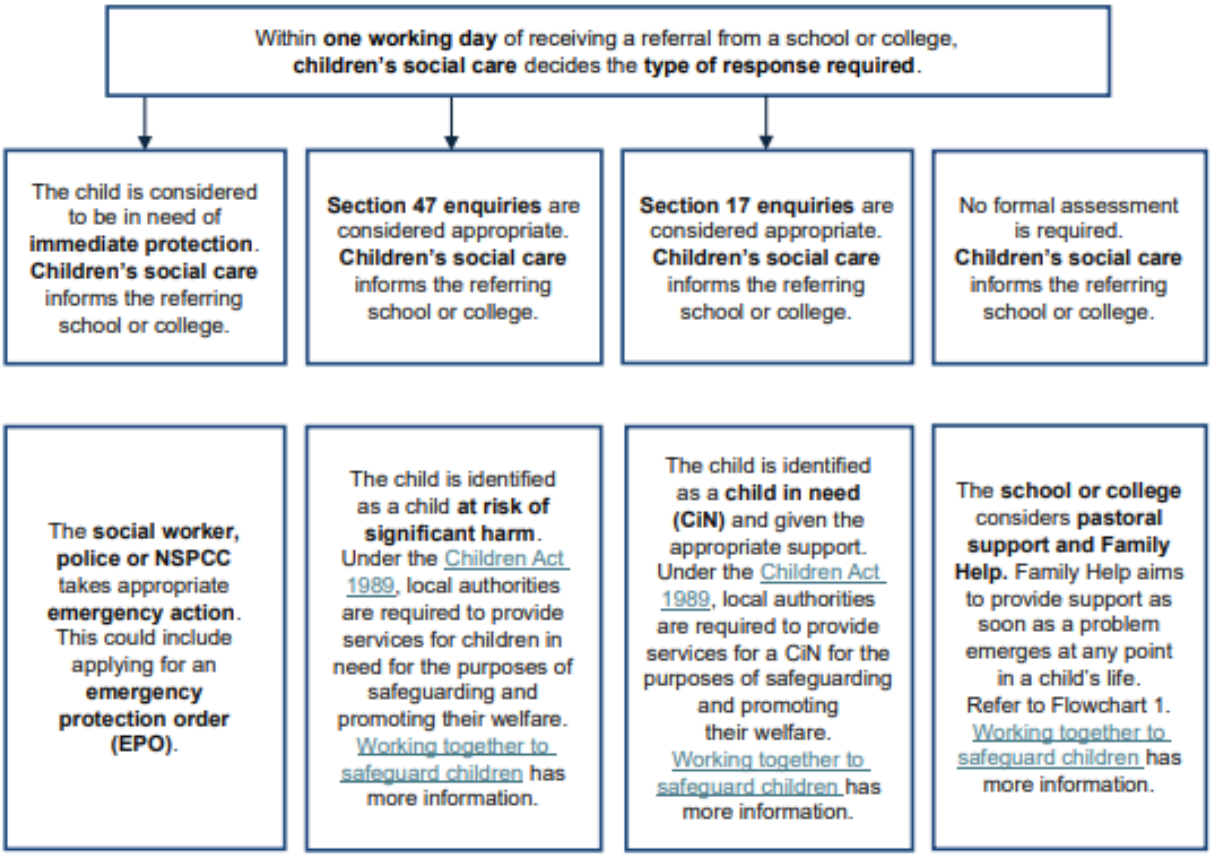
NSPCC Whistle-blowing Helpline	Tel: 0800 028 0285 help@nspcc.org.uk
National Bullying Helpline	Tel: 0845 22 55 787
Police	Non-emergency Tel: 101 Emergency Tel: 999
Police - School Engagement Officer	Tyrone Abraham Tyrone.abraham@gmp.police.uk
Prevent and Counter Extremism	Non-emergency advice on religious and political extremism Tel: 020 7340 7264 Police: Tel: 101 counter-extremism@education.gsi.gov.uk Make a report
Protect Team, Manchester (Child Sexual Exploitation)	01332 585371 Manchester Safeguarding Partnership
UK Safer Internet Centre	Tel: 0344 381 4772 www.saferinternet.org.uk

Summary: Actions when there are concerns about a child.
Taken from Keeping Children Safe in Education



Summary: Actions once a referral has been made to children's social care.

Taken from Keeping Children Safe in Education



Introduction

Manchester High School for Girls (the School) is committed to acting in the best interests of the child and will take actions to enable all pupils to have the best outcomes. The safety and welfare of children is the statutory responsibility of all those who come into contact with them in the School.

All staff, volunteers and governors will be pro-active in trying to identify possible safeguarding issues and will report concerns immediately to one of the School's Designated Safeguarding Leads (DSLs).

Other relevant School policies and procedures include:

- Anti-Bullying Policy
- Artificial Intelligence Policy Senior School
- Attendance Policy
- Behaviour and Discipline Policy
- Communication Guidance Document
- DBS Disclosure Checks Policy and Procedure
- Employment Policy (Parts 1 & 2)
- Equal Opportunities Policy
- Foundation Stage Policy
- Health & Safety Procedures, including Risk Assessments
- Leave of Absence for the Purpose of Studying Policy and Procedure
- Mental Health Policy
- Mobile Phone and Personal Electronic Devices Policy
- Online Safety Policy
- Spiritual, Moral, Social & Cultural Education Policy
- Staff Code of Conduct
- Whistle Blowing Policy

Legislation and Guidance

This Policy has regard to the following guidance and advice:

- Channel Duty Guidance: Protecting people susceptible to radicalisation (2023)
- Children Act (1989 and 2004)
- Children's Wellbeing and Schools Act (2026)
- Children Missing Education (September 2025)
- Child exploitation disruption toolkit (September 2022)
- Crime and Policing Act (2026)
- Criminal exploitation of children and vulnerable adults: county lines (October 2023)
- Criminal records check for overseas applications (May 2024)
- Disqualification under the Childcare Act 2006 (August 2018)
- Equality Act 2010: Advice for Schools (June 2018)
- European Convention on Human Rights (1953)
- Human Rights Act (November 1998)
- Information sharing: advice for practitioners providing safeguarding services (September 2026)
- Keeping Children Safe in Education (July 2026) (KCSIE)
- Keeping children safe during community activities, afterschool clubs and tuition (September 2023)
- Manchester Multi-Agency Safeguarding Arrangements (MMASA) (June 2019)
- Manchester Safeguarding Partnership
- Meeting digital and technology standards in schools and colleges (May 2024)

- Mental Health and behaviour in Schools (November 2018)
- Missing Children and Adults Strategy (December 2011)
- Modern Slavery: how to identity and support victims (July 2026)
- Multi-agency statutory guidance on FGM (July 2020)
- Prevent Duty Guidance for England and Wales (April 2023)
- Relationship Education, Relationships and Sex Education (RSE) and Health Education (September 2026)
- Searching, Screening and Confiscation advice (July 2022)
- Sharing nudes and semi-nudes: how to respond to an incident (December 2020)
- Sexting in Schools and Colleges (UKCCIS)
- Sexual Offences Act (2003)
- Sexual violence and sexual harassment between children in schools and colleges (September 2021)
- Statutory framework for the Early Years Foundation Stage (January 2024)
- Teaching online safety in schools (January 2023)
- The Charity Commission guidance: duties to safeguard children (November 2021)
- The Prevent Duty: Departmental Advice for Schools and Childminders (June 2015)
- The Teachers' Standards (December 2021)
- The Use of Social Media for On-line Radicalisation (July 2015)
- Understanding and Responding to AI-generated child sexual abuse material, CEOP (June 2026)
- Using AI in Education (May 2026)
- Restrictive interventions, including use of reasonable force, in schools (April 2026)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Improve School Attendance (July 2026)
- Working Together to Safeguard Children (March 2026).

Definitions and terms used in this policy

Abuse may be defined as an act of commission or omission judged by the community and professional experts to be inappropriate or damaging. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children. Abuse includes where a child sees, hears, or experiences the effects of domestic violence. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

A child is defined as a person under the age of 18. Students with special educational needs, learning difficulties or disabilities are included in child protection legislation until they are 21.

A child in need is defined in Section 17 of the Children Act (1989) as a child who is unlikely to achieve or maintain a satisfactory level of health and development will be significantly impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under Section 17 of the Children Act 1989, in relation to their special educational needs, disabilities, or as a young carer, or because they have committed a crime. The process for assessment should also be used for children whose parents are in prison and for asylum seeking children.

A child at risk is defined in Section 47 of the Children Act (1989) as a child who is, maybe suffering, or likely to suffer, significant harm. In this instance action is required to safeguard and promote the welfare of a child.

Section 47 places Social Services under a duty to investigate as to whether a child is subject to an Emergency Protection Order, Police Protection or is likely to suffer significant harm.

Child Protection is defined as the right to intervene when children's safety or continued wellbeing is under threat. In most cases it is appropriate to seek parental consent. However, this is not a requirement.

Contextual Safeguarding recognises that the different relationships formed by young people in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts. Young people's experiences of extra-familial abuse can undermine parent-child relationships. Any safeguarding and CP assessment will consider all available evidence and enable a contextual approach to address any harm.

Designated Safeguarding Lead (DSL) or the Deputy Designated Safeguarding Lead in their absence, is defined as the member of senior management to whom staff must immediately refer any child protection concerns. If a child is in danger or is at imminent risk of significant harm, a referral must be made to Children's Social Care and/or the Police immediately. The DSL (Deputy DSLs) also acts as the contact between school, family and external agencies.

Equality Act 2010 (EA) sets out the directive that schools must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). In the context of safeguarding and the legal duties placed on School, while promoting the welfare of children, governing bodies and proprietors, Manchester High School for Girls will carefully consider how we support our community with regards to protected characteristics; disability, sex, sexual orientation, gender reassignment and race. It is noted that provisions within the Equality Act allow School to take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need. This includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. As such we will take positive action to support students if there is evidence they are being disproportionately subjected to sexual violence or sexual harassment. For further guidance: Equality Act 2010

Exploitation is a form of abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in a criminal or sexual activity.

Filtering and Monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material. Governing bodies and the DSL have overall strategic responsibility for filtering and monitoring and need assurance that the standards are being met.

Harmful Sexual Behaviour - Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that apply in the UK. Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention. Therefore, Manchester High School for Girls respects and protects an individual's human rights when making decisions about the individual, and

that young people have the right to expect a reasonable level of personal privacy. For example: Article 3: the right to freedom from inhuman and degrading treatment (an absolute right) - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity - Article 14: declaring that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and Protocol 1, Article 2: which protects the right to education. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. For further guidance: Human Rights Act.

Manchester Safeguarding Partnership (MSP) The Manchester Safeguarding Partnership is made up of organisations that work together to safeguard and promote the welfare of adults, children, young people and their families across the city of Manchester. MSP has adopted the Greater Manchester Safeguarding Children Procedures (GMSCP). This policy is, therefore, written in accordance with locally agreed interagency procedures. As with all such procedures, the focus is on identifying, wherever possible, problems from the earliest possible point.

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. However, Staff are well placed to observe children day-to-day and identify behaviour which suggests that they may be experiencing mental health problems. Adverse Childhood Experiences (ACE) can have a lasting impact throughout childhood, adolescence and into adulthood. Mental health concerns are a safeguarding concern. (See Mental Health Policy) Further information can be found in the Mental Health and Behaviour in Schools Guidance.

Multi-agency involves cooperation between several organisations, bringing these practitioners together to provide an integrated way of working to support children and their families. The School deals with a range of local authorities and this policy has been written in accordance with Manchester Multi-Agency Safeguarding Arrangements (MMASA). Locally, the three safeguarding partners (Local authority; a clinical commissioning group; Chief of Police) will make arrangements to work together. This collaborative work will include child death review partner arrangements.

PACE Code C 2023. PACE Code C: sets out the requirements for the detention, treatment and questioning of people in police custody by police officers. This Act governs a major part of police powers of investigation including, arrest, detention, interrogation, entry and search of premises, personal search and the taking of samples.

Public Sector Equality Duty (PSED) is found in the Equality Act, placing a general duty on School to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act). Equality to foster good relations between those who share a relevant protected characteristic and those who do not. This duty applies to all protected characteristics. Hence the importance of good record-keeping and the monitoring of all forms of abuse and harassment. All staff have a responsibility to focus on key issues of concern and how student outcomes can be improved. It is to be recognised by all that some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. For further guidance: Public Sector Equality Duty

Safeguarding and promoting welfare is defined as: protecting a child from maltreatment, preventing impairment of a child's mental and physical health or development, ensuring that the child grows up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best life chances. Child protection is one part of the safeguarding policy.

'Sexting' is defined as sharing nudes and semi-nudes, regardless of whether they are consensual or non-consensual: UKCIS guidance. All incidents of this nature require a safeguarding response.

Staff refers to all individuals working in or for the School including all teaching and non-teaching staff, parttime staff, supply staff, Governors, volunteers, trainee teachers, coaches and contractors. It is an offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child. All staff have a responsibility to safeguard children.

Training: Experts and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.

When planning, the trainer will use the links to government guidance as required on specific safeguarding issues, for example: Educare, Young Minds and the NSPCC websites, also 'educate.against.hate.' The GOV.UK website will also provide information listed under Specific Safeguarding Issues in KCSIE 2026.

Aims

The School will consider at all times, outcomes which are in the child's best interest. Actions will be taken to ensure a whole school child-centred and coordinated approach to safeguarding. School will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

The School recognises its duty to Safeguard and promote the welfare of all its pupils in a manner that respects the dignity, privacy and beliefs of all and without discrimination on the basis of gender, race, ethnicity, religion, sexual orientation or disability. In line with the Equality Act (2010), no child will be treated less favourably than another due to her individual circumstances. Each child should know that their concerns will be treated seriously and that they can safely express their views and give feedback.

This policy is applicable to the whole School community – all registered pupils of the School. All staff, volunteers and governors have a duty to safeguard the School's pupils. They must therefore familiarise themselves and always comply with this policy. Along with the School's code of conduct for staff, they must also read Part One of KCSIE. The School will put in place training mechanisms to assist staff, volunteers and governors in understanding and delivering their role and responsibilities, as set out in Part One of KCSIE. This will include regular (at least annually) update briefings, discussion, and evaluations of their training needs.

The School will take special care to safeguard the welfare of pupils who are known to live in particularly stressful circumstances. These include families living in poverty, families where there is domestic violence, families where a parent has a mental illness, is misusing drugs or alcohol or has a learning disability, families that face racism and other forms of social isolation and families living in areas with a lot of crime, poor housing, and high unemployment.

The School understands that additional barriers can exist when recognising abuse and neglect in children with special educational needs and disabilities. Care will be taken not to assume that indicators of abuse such as behaviour, mood and injury relate only to a child's disability without further exploration. It is recognised that children with SEN and other disabilities can be more vulnerable to and impacted by behaviour such as bullying or child-on-child abuse even when they don't exhibit any obvious signs of distress. These children may also experience barriers in communicating their concerns and may find it difficult to overcome these without specific support.

The School also understands that children who are lesbian, gay, bisexual or questioning their gender (or perceived to be) may require a trusted adult with whom they can be open. Such inclusion is an important aspect of our school community. It is vital that staff endeavour to reduce the additional

barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

The School aims to prepare students through it's Values and education for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence. The School understands that racism, faith-targeted prejudice and other discrimination are harmful in their own right and can significantly affect a child's welfare, wellbeing and sense of safety. The School promotes an inclusive anti-discriminatory culture as part of our safeguarding duties; this is supported through our School Values, staff training and regular education.

All staff must be aware of the difference between a 'concern' and a child being in 'immediate danger' and the required actions in each case. In the case of a concern, a member of staff should have a conversation with the DSL (Deputy DSLs) to agree a course of action. The DSL or Deputy DSLs will act in accordance with the relevant Local Authority thresholds of the young person, which will determine the level of need required. School will allow access for children's social care from the host local authority or a placing local authority to conduct a section 17 or section 47 assessment.

If a child is in immediate danger or is at risk of harm, a referral to the relevant Local Authority Safeguarding Partnership and/or the Police **should be made immediately**. Any member of staff can make a referral although the DSL should be informed as soon as possible that a referral has been made.

All staff should not assume that a colleague or another professional will take action and share information that will keep a child safe. Early information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. School has authority to share, hold and use information for these purposes. The School will take action to promote the welfare of a child in need of additional support, even if they are not suffering harm, or are not at immediate risk.

This policy is published on the School website. The policy, and all policies referred to in it, are also available to School staff on the Intranet; hard copies are available on request.

Safeguarding Children and Whistle Blowing

The School has a culture of safety and raising concerns. Equally, the School values staff and encourages an ethos of reflective practice. A member of staff who has safeguarding concerns about another member of staff (including supply staff, trainee teachers, volunteers, and contractors) posing a risk of harm to children, or more general concerns about failings in the School's safeguarding and child protection procedures, should report them in accordance with this policy or following the guidance in the School's Whistle Blowing policy. They can be confident that such concerns will be thoroughly investigated. Adverse consequences will not be suffered by anyone who reports a genuine concern in good faith. Concerns about a member of staff should be made directly to the Head Mistress, who will consider whether an onward referral to the LADO is required.
Where there are allegations of criminal activity, the relevant authorities will always be informed by the DSL or Deputy DSL. In this instance, the Manchester Safeguarding Partnership will be referred to.

The NSPCC whistleblowing helpline is also available as an alternative route for staff who feel unable to raise the issue with the School, or have concerns about the way a case is being handled by the School:

The NSPCC Whistle Blowing helpline: Tel: 0800 280 285; email: help@nspcc.org.uk.

Key responsibilities of all governors, staff and volunteers

All governors, staff (including supply staff and contractors who are on site at the same time as students) and volunteers must play a part in preventing abuse, neglect and exploitation through:

- Being aware of procedures to manage safeguarding concerns, or allegations against staff (including supply staff, trainee teachers, volunteers and contractors) that might indicate they would pose a risk of harm to children (see Whistle Blowing policy).
- Knowing, understanding and complying with School policy and procedures on child protection and safeguarding.
- Knowing the signs and symptoms of abuse and being vigilant in noticing such signs in pupils (see Appendix 1).
- Ensuring that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding.
- Knowing that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.
- Reporting allegations or suspicions to the appropriate DSL, or in her absence to one of the Deputy DSLs immediately. If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral.
- Maintaining an attitude of 'it could happen here' where safeguarding is concerned.
- Monitoring changes in the behaviour of pupils in their care and reporting these concerns to the DSL or Deputy DSLs.
- Monitoring the attendance of their pupils carefully and reporting concerning patterns of absence, to the DSL or Deputy DSLs.
- Helping pupils, through the teaching of the curriculum and as positive adult role models, to understand what is and what is not acceptable behaviour towards them and how they can stay safe.
- Creating and maintaining a safe and secure environment for pupils and staff.
- Ensuring that any visitor for whom the School does not have a DBS check is supervised by a member of staff for the duration of their visit and that appropriate due diligence has been carried out before arranging the visit. N.B. Professionals, such as Police or Local Authority Social Workers have DBS from their employer but will be asked for ID. Being approachable so that pupils will share their worries and concerns.
- Adopting a child-centred approach by giving the pupil the right to participate in some decisions about her safety and welfare, in line with her age and maturity.
- Monitoring, carefully, the outcomes for the child in order to ensure her continued welfare and discussing possible early help assessment requirements i.e. providing support as soon as a problem emerges with the DSL or Deputy DSLs.
- Promoting the spiritual, moral, social and cultural development of all pupils.
- Providing pupils with a range of cultural opportunities which promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.
- Knowing that 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.
- Exercising diligence to prevent an organisation or speaker from using the School's facilities to disseminate extremist views or radicalise pupils and following the Visiting Speaker protocol by completing the relevant documentation for the DSL prior to the visit.
- Recognising that children can abuse their peers (child-on-child abuse)
- Recognising that racism, faith-based prejudice and other discrimination are harmful and are serious safeguarding issues that must be reported.

- Attending update training on safeguarding children at least annually and in-depth training at least every three years. Such training will include online safety.
- Reading, understanding and complying with the Staff Code of Conduct
- Raising concerns about poor or unsafe practice and potential failures in the School's safeguarding.
- Raising concerns about a child's mental health, in line with other safeguarding concerns.
- Understanding that safeguarding issues often overlap.

Management of safeguarding practice

The School fulfils its aims and its statutory responsibility or 'Duty of Care' as set out by national government, the Manchester Safeguarding Partnership and ISI Regulatory Requirements by:

Governors, staff (including supply and trainee teachers) and volunteers

- ensuring that safer recruitment practices are followed in checking the suitability of staff, governors and volunteers to work with children
- providing a Staff Code of Conduct (incorporating Safer Working Practice) and Whistle-Blowing Policy in order to protect staff and students
- ensuring that a policy is in place for handling allegations of abuse against members of staff, supply teachers, trainee teachers, volunteers, contractors, and the Head Mistress (see Appendix 5 page 48)
- providing an Acceptable Use of ICT policy for both staff and students and utilising filtering and monitoring systems which enable information on concerning search items to be gathered
- creating an ethos in which staff and volunteers feel able to raise concerns about unsafe practice and ensuring that such concerns are addressed sensitively and effectively
- providing and implementing child protection policy and procedures, updated annually, so that staff know how to respond to signs or reports of child protection issues
- raising the awareness of staff, through regular training, about indicators of neglect / abuse in children and possible medical emergencies such as asthma, allergies and anaphylactic shock. See the Allergy Policy, First Aid Policy and the government guidance: Supporting pupils with medical conditions at school.
- emphasising to staff the core skills of a child-centred approach: listening; being able to convey genuine interest; showing empathy, understanding, emotional warmth and respect for the child; the capacity to reflect, distinguishing between facts and opinions; the capacity to manage one's own emotions when dealing with the difficulties of the child
- understanding the importance of identifying children who may benefit from early intervention or family help assessment
- employing a School Nurse to assist in providing emotional and medical support for vulnerable pupils
- teaching students about safeguarding, including online safeguarding, through teaching and learning opportunities
- appointing a DSL in both Senior and Preparatory School who will take lead responsibility for child protection, provide support to staff members in carrying out their safeguarding duties and liaise closely with external services such as children's social care
- allowing access for children's social care or local multi-agency safeguarding team to conduct or consider whether to conduct an assessment of a child in line with the Children's Act 1989
- being aware that all staff members may be asked to support social workers to take decisions about individual children.

Use of school or college premises for non-school/college activities

- Director of Finance & Operations to monitor the nature of any community groups who may use the school premises, with a view to keeping children safe. Assurance will be sought from

the body concerned that they have appropriate safeguarding and child protection policies and procedures in place and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate.

- Where services or activities are provided separately by another body, assurance should be sought from the provider that appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether the children who attend any of these services or activities are children in the school. School will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

- If School were to receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children, as with any safeguarding allegation, School will follow safeguarding policies and procedures, including informing the LADO.

Visitors

- ensuring that all visitors who can access students directly are given the safeguarding statement to read
- using visitor speaker forms for the DSL to check so as to ensure that all external speakers cohere with the School's commitment to the implementation of Keeping Children Safe in Education. An **External Visitors form** must be completed prior to any visitor accessing students
- Ensuring that professionals from partner agencies are asked for ID when visiting the School.

Pupils

- ensuring staff vigilance so that adults notice when things are troubling them
- establishing a safe and secure environment and a positive, supportive ethos in which children can feel valued and develop academically and personally
- creating an ethos in which children are encouraged to share concerns with an adult, knowing that they will be listened to, respected, supported, and consulted before action is taken
- building stable relationships with children, based on trust
- publicising and implementing a clear code of conduct for students, with summaries in the Student Planner and Parent Handbook
- implementing consistent behaviour management and anti-bullying procedures which try to establish cause as well as effect of inappropriate behaviour
- respecting personal privacy by only circulating information to staff who need to know in order to protect the child
- ensuring that explanations are provided concerning decisions made relating to the child's welfare
- raising awareness of safeguarding issues amongst pupils, by including in the Well Being curriculum, form time and assemblies, information on healthy personal relationships; recognising risk and making safer choices; recognising when pressure from others, including people they know, threatens their personal well-being; using assertiveness techniques to resist unhelpful pressure; developing skills to cope with emergency situations; knowing when and where to get help, Online Safety, fundamental British values.

Communication with external agencies and parents

- working to develop effective links with relevant external agencies, particularly Children's Social Care services, and cooperating with enquiries regarding child protection and family support, including attendance at family group conferences, strategy discussions and child protection conferences
- ensuring that parents understand the responsibility placed on the school and staff for child protection by providing the safeguarding and child protection policy on the School's website.

Responding to a disclosure - quick reference guide for staff, governors, contactors and volunteers

All cases of suspected child abuse (physical, sexual, emotional, neglect or exploitation) should be given the highest priority.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened not to share what is happening to them. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

The following sequence of actions should be adhered to.

Act immediately if a child arrives in school needing urgent medical treatment.
Take her to the School Nurse, who will consult the appropriate medical professionals to arrange treatment. In the absence of the School Nurse, ask for a First Aider.

Listen to what the child has to say in a private area (ensuring that guidance in Staff Code of Conduct on one-to-one meetings with pupils is adhered to). **It is essential that the situation is not investigated, only that information is collected which can be passed on**. Keep calm.

Reassure the pupil that they are right to have shared this information and acknowledge that it must have been difficult for them to do so.
Be accessible and receptive.
Be aware that reporting an incident of sexual violence may be especially traumatic.
Do not interrupt. Do not prompt. Do not over-question.
Be aware of your non-verbal messages.
If you need to ask a question to clarify your understanding, pose the question in an open manner, in order to avoid leading the child in any way.
Do <u>not</u> give undertakings of confidentiality to the pupil.
Let her know that you will have to tell someone to get help for her.
Do not promise that you resolve things.
Do not share your own experiences.
Remind the pupil about the confidential helplines for Childline and the NSPCC contact details for which are printed in the Student Planner.

Report orally <u>immediately</u> to the DSL or, in their absence, to one of the Deputy DSLs.

Be aware that they need a thoughtful proportionate response. Move away from the 'you tell us, and we'll deal with it'. Give the student options: I can go to the DSL…, would you like to come… I need to see the DSL because… you can go to the DSL… we can both go to the DSL.

Do not tell any other staff, even if a parent or child asks you to.
If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral.

Record in detail the discussion as soon as is practicable, but always within 24 hours
Use the child's own words. Include any clarification questions you asked, in your write up. If handwritten, your record should be signed and dated and uploaded to CPOMS and given to the DSL (for confidential disposal). If typed, your record should be logged on CPOMS with the correct date and time. (See Appendix 7 on page 68).

Include the names of any people present at the disclosure; date, time, context, location and sequence of the conversation; a brief outline of what the pupil said had happened, when and to whom and by whom; the nonverbal behaviour and demeanour of the pupil; a brief description of any visible or alleged physical injuries (the School Nurse will record these); the pupil's preferred follow-up action.
These notes may be needed in subsequent court proceedings, and you are accountable for their accuracy. This record should be placed in a sealed envelope and given to the appropriate DSL.

Following the submission of a report to the DSL, the person concerned should continue to monitor the child's safety and welfare. Where concerns continue, the person should remain in contact with the DSL or Deputy DSLs to ascertain what action is being taken. Staff should understand that they can refer a child directly to Children's Social Care, especially where they are concerned that a child is suffering or likely to suffer significant harm. There is a duty on all staff to persist with referrals to Children's Social Care if they feel appropriate action is not being taken. The School will fully support any member of our community who raises a concern over the safety and welfare of a child.

Follow-up to a disclosure or raising of a concern

The decision to refer concerns over a child's safety and welfare to Children's Social Care will normally be taken by the DSL or Deputy DSLs. However, anyone can make such a referral by speaking to staff at the First Response Team (using the Children's Social Care contact numbers on page 2). Schools are required to share information that may help another agency to safeguard children or promote their welfare. The DSL or Deputy DSLs will identify lawful basis for sharing information and explain this to parents/carers, but they do not need to seek permission to do so.

The only exception to information sharing is where sharing would be more detrimental to the child that not sharing. Such circumstances are rare, but when they occur the DSL team will discuss this carefully and document their decisions and rationale.

The School will not impose high thresholds on referrals to Children's Social Care or other external agencies such as the Police. GDPR will not be allowed to stand in the way of safeguarding children. When responding to concerns over a child's safety and welfare, the School will follow both the Greater Manchester Safeguarding Partnership (MSP) guidance and the more detailed guidance on thresholds found in the Manchester Safeguarding Partnership (MSP) Multi-Agency Levels of Need (Threshold) Document and those for the relevant Local Authority of the young person.

The School will always make a referral:

- where a child is in immediate danger or suffering or likely to suffer significant harm
- with the agreement of the child and/or a person with parental responsibility (depending on the age of the child), if a child is likely to benefit from family support services

Referrals will be made even where it is known that Children's Social Care is already involved with the child and/or her family.

A verbal referral will be supported in writing, usually by the completion of a Safeguarding Children Referral Form or equivalent document within 24 hours of the referral being made. The content of the referral will be discussed with parents where this is appropriate. It is good practice to discuss concerns with the parents and where possible to seek agreement, but this will not be done where it could prejudice an investigation or place the child at further risk. Parents are unlikely to be told that a referral is being made if sexual abuse or fabricated illness is suspected. In such cases, advice will be sought initially from the appropriate agencies.

If there is an injury and it is so serious that immediate medical treatment is required, the DSL or Deputy DSLs will arrange for the child to be taken to hospital, usually accompanied by the School Nurse. The parents will be informed that this action has been taken.

The DSL or Deputy DSLs will make decisions on sharing information with other agencies and with parents based on professional judgement, experience and training. Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required when there are reasonable grounds to believe that a child is at risk of significant harm. The Head Mistress will normally be consulted when any external agencies are involved.

The DSL or Deputy DSLs are responsible for contacting external agencies on behalf of any student of the school. In their absence, the School Nurse will contact external agencies. Initially, information may be discussed without naming the child, in order to obtain advice about whether a referral is necessary.

The DSL or Deputy DSL will contact external agencies by telephone (or by written referral) **within 24 hours** of a disclosure or suspicion of abuse and advice will be followed. However, if the child is considered to be in need or has or may have suffered significant harm, then the referral will take place **immediately**. In this instance, information may be shared relating to the individual child's development needs and the capacity of the parents to meet them.

At the end of any discussion with Children's Social Care, the DSL or Deputy DSLs must be clear about local multi-agency safeguarding arrangements proposed response, timescales for action and who will be taking the action, or if no further action is needed.

Any calls received by another member of staff from external agencies should be transferred to the appropriate DSL.

If a student is referred to the Children's Social Care team by the DSL or Deputy DSLs, the local multi-agency safeguarding team should make a decision within one working day about the course of action it is taking. They should then let the referrer know the outcome. This will include determining whether:

- urgent action is required.
- the child will be assessed under section 17 or 47 of the Children Act 1989.
- any services are required.
- further specialist assessments are required to assist in the decision making.

Should this information not be forth coming within 24 hours the referral should be followed up by the DSL. Equally the DSL or Deputy DSLs will press for re-consideration should it be felt that their concerns have not been addressed to ensure that the child's situation improves.

All staff will do everything they can to support an assessment as directed by the DSL or Deputy DSLs. If it is deemed necessary to the child's welfare, the DSL will pass on selected information to the Head of Year and the Form Tutor. This information will be on a strictly "need to know" basis.

It is essential that children who are known to be at risk, or about whom there has been concern in the past, are observed closely in school and that the DSL or Deputy DSLs are alerted immediately to concerns. The DSL or Deputy DSLs will liaise with the appropriate Children's Services.

The DSL or Deputy DSLs will notify Children's Services if there is an unexplained absence of more than two days of a student who we know is on the Child Protection Register and is presently being monitored closely. It is the responsibility of the Deputy DSLs to alert the DSL of such an absence in the Senior School and the responsibility of the DSL in the Preparatory School. The Local Authority are also notified if a child subject to a child protection plan is about to be permanently excluded or when it has been agreed as part of any child protection plan or core group plan.

The DSL will store records written by all involved adults and will produce records of the observations, conversations, contact with external agencies and action taken.

The needs of those children who do not meet the threshold of needing intervention from children's social care will be met by universal services and their needs monitored in School, depending on the advice received from the specific authority. Regular monitoring of such children will be carried out by the DSL / Deputy DSLs together with other members of staff who may have an important role in the life of the child (e.g. Head of Year).

Family Group Meetings, Child Protection Case Conferences and Strategy Meetings
The School takes the commitment to attend meetings related to safeguarding and child protection cases very seriously and will try to ensure that the DSL or a Deputy DSLs can attend, but any member of staff could be required to participate. In the unlikely event that a member of staff cannot attend, a written report will be sent to the conference to convey the latest information from the School.

If the child is placed on the local Child Protection Register, a Core Group will be agreed. The School will provide cover to enable the appropriate person to attend monthly regular Core Group meetings.

Early Identification, Early Help and Family Help

In line with KCSIE and Working Together to Safeguard Children, the School operates within the statutory family help framework that encompasses a continuum of support to assist children and families who are at risk of harm or already experiencing harm.

Internal pastoral support is available and may include: regular meetings with the pupil and/or her family with Form Tutors, Head of Year, Head of Section or SENCO; appointments with the School Nurse or School Counsellor; regular meetings with the pupil and/or her family with the Deputy Head (Pastoral); working with other agencies to develop appropriate support.

Family Help (within the Families First reforms, was previously Early Help) provides support for children and families where needs are emerging or escalating, helping to prevent concerns from progressing to statutory intervention.
Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All school and college staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs

- has special education needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- is showing signs of being draw into anti-social or criminal behaviour, including gang involvement, organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions or is at risk of being permanently excluded from school
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol or other drugs themselves
- is at risk of so-called 'honour'-based abuse such as FGM or Forced Marriage
- is a privately fostered child.

Effective early help assessment relies upon the School and local agencies working together to:
- identify children and families who would benefit from early help assessment
- undertake an assessment of the need for early help assessment
- provide targeted early help assessment services to address the assessed needs of a child and their family which focuses on activity to improve significantly the outcomes for the child

Staff may be required to support other agencies or act as the lead professional in an early help assessment. Where a referral for statutory services has been made, the local authority should make a decision within 24 hours. School will be proactive in asking for an update of action if the local authority is not forthcoming. All cases will be reviewed and consideration given to a referral to the relevant Safeguarding Partnership if the situation does not improve or indeed gets worse.

The MSP publishes a threshold document that includes:
- the process for the early help assessment and the type and level of early help assessment services to be provided
- the criteria, including the level of need, for when a case should be referred to local authority Children's Social Care for assessment and for statutory services under (a) section 17 of the Children Act 1989 (children in need) and (b) section 47 of the Children Act 1989 (reasonable cause to suspect children suffering or likely to suffer significant harm).

The MSP produces detailed guidance on the early help assessment process. However, it must be remembered that the School's pupils live in a variety of districts in the North West, all of which have their own early help assessment procedures.

Where concerns over a child's safety and welfare do not meet the criteria for immediate referral to Children's Social Care, the School will follow the relevant detailed guidance on early help assessment and multi-agency working. This may result in the submission of an Early Help Assessment and, depending upon the circumstances of each case and discussions with any other agencies, might lead to the formation of a Team Around the Child (TAC).
In 'borderline' cases, i.e. where it is not immediately clear whether to make a referral or proceed via the EH framework, the School will consult the relevant Children's Social Care First Response Team for advice. However, and regardless of the precise details of a response in any particular case, the School will always respond to concerns over a child's safety and welfare on the premise that concerns must always be shared.

It is to be hoped that in each case early help assessment will improve the welfare of the child. However, each case will be kept under review, and consideration will be given to a referral to Children's Social Care if the child's situation does not appear to be improving.

Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police), inter-agency assessment will be considered. These early help assessments, identify help that the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

If any member of staff identifies a child who would benefit from an early help assessment, they should alert the DSL utilising the 'MHSG Log of concern about a child's welfare' sheet (see Appendix 7) or via the School's child protection online monitoring system known as CPOMS. The initial assessment will be undertaken by the DSL. A decision will be made about who will provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. This 'lead professional role' may be undertaken by the DSL, a Deputy DSL, Head of Year, medical staff or Special Educational Needs Co-ordinator (SENCo). Decisions about who should be the lead professional will be taken on a case by-case basis and will be formed by the needs of the child and their family.

For an early help assessment to be effective:

- the assessment should be undertaken with the agreement of the child and their parents. It will involve the child and family as well as all the professionals who are working with them.
- the lead professional should be able to discuss concerns they may have about a child and family with a social worker in line with local multi-agency safeguarding arrangements. Local Authority Children's Social Care should determine the process for this to happen.
- if parents and/or the child do not consent to an early help or family help assessment, the referral must still be made; families can still decide if they take up any support offered to them as a result of this. If Early Help is offered and refused, the lead professional will make a judgement as to whether, without help, the needs of the child will escalate and if so consider further referrals.

For advice on how to respond to the needs and interests of children and families and be clear about what is required of individuals, and how they need to work together in partnership with others; see Working Together to Safeguard Children.

Child-on-Child Abuse (including Managing Sexual Violence and/or Sexual Harassment Between Children)

see Part 5of KCSiE 2026.

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online.
Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, racism, faith-targeted, prejudice-based and discriminatory behaviour)
- abuse in intimate personal relationships between children
- physical abuse (this may include threatening or encouraging physical abuse)
- serious physical assault, or the threat of harm, with a weapon
- sexual violence and sexual harassment (see below)
- causing someone to engage in sexual activity without consent (note that under 13s can never legally consent to sexual activity)
- consensual and non-consensual making or sharing of nudes and semi nudes

- upskirting which typically involves taking a picture under a person's clothing without their permission
- initiation/hazing type violence and rituals

The School has a zero-tolerance approach to racism, prejudice-based and faith-targeted bullying and staff must be alert to the signs and impact and report any concerns of this nature to the DSL. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. The DSL maintains a record of racism, faith-targeted, prejudice-based and discriminatory behaviour.

Sexual violence and sexual harassment can occur between two children of any age and sex and within intimate personal relationships between peers. The following factors are vital in understanding the issue:

- A zero-tolerance approach to sexual violence and/or sexual harassment
- A group of children may sexually assault or sexually harass a single child or group of children
- Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face and are never acceptable. The Hackett Continuum should be consulted for guidance: HSB framework and audit | NSPCC Learning
- Abuse that occurs online and/or outside of the School should be treated equally seriously and should be reported to the DSL by staff if they become aware of it
- It is recognised that even if there are no reports of harmful sexual behaviour this does not mean is it not happening
- All reports of sexual violence and/or harassment will be taken seriously, and the victim will be reassured, regardless of how long it has taken them to come forward, and that they will be supported and kept safe
- All staff are advised to maintain an attitude of 'it could happen here'
- All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report
- It is important that all members of the community understand that the law is in place to protect children and young people rather than criminalise them, and this should be explained in this way, especially to those reporting sexual violence or sexual harassment
- Early intervention can help prevent problematic, abusive and/or violent behaviour in the future
- The distress experienced by victims is likely to adversely affect their educational attainment and will be exacerbated if the alleged perpetrator attends the same school
- Safeguarding incidents and behaviours can be associated with factors outside the school, including personal relationships
- It is especially important not to pass off any sexual violence or harassment as 'banter' as this can lead to a culture of unacceptable behaviours, misogyny, an unsafe environment for children and in worst cases a culture that normalises abuse
- All staff should be aware of the dangers of technology assisted child abuse, e.g. AI-generated content such as deepfakes that can be a form of harmful sexual behaviour, and must be reported to the Police and the DSL.
- No illegal images of a child should be viewed or forwarded
- There should always be attention as to whether there have been other victims
- Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach an individual's Human Rights as per the Human Rights Act
- The wishes of the victim will be considered, in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will be balanced with the school's duty and responsibilities to protect other children.

How the School responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. The DSL or Deputy DSLs are the most appropriate persons to decide on the initial response of the school. Important considerations will include: the wishes of the victim, the nature of the alleged incident/s, the age of the pupil, any power of imbalance between the children involved, the frequency of the alleged incident, possible ongoing risks, whether there may be other victims, how the victim's wishes in terms of how they want to proceed with regard to control and support will be balanced with the school's duty and responsibilities to protect other children and other related issues. Supporting information to determine where the school fits into the wider environment can be found here: contextual safeguarding. School will consider every report on a case-by-case basis, while taking immediate action to safeguard their children, for example when to inform the alleged perpetrator(s) will be a decision that should be carefully considered.

When citing sexual violence school will refer to sexual offences under the Sexual Offences Act 2003.

The following principles will shape decisions regarding safeguarding and supporting the victim:

- The ages of the children involved and their developmental stage.
- Any power imbalance between the children. For example, age, maturity, confidence, standing and reputation. Does the victim have a disability or learning difficulty?
- Is there a sustained pattern of abuse – including other forms of abuse?
- Contextual implications: intra-familial harms (child sexual abuse (CSA) which occurs within a family environment) and any necessary support for siblings. Any further risks to the victim, other children, other adults, staff etc. possible links to child sexual exploitation and child criminal exploitation.
- The paramount needs and wishes of the victim. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- The nature of the alleged incident(s), will be assessed, including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed.
- Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- School will be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs, NSPCC and the Lucy Faithful Foundation (including Shore)
- Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged.

Where there is a criminal investigation into a rape, assault by penetration with an object or sexual assault the alleged perpetrator will be removed from any classes they share with the victim. School will consider how best to keep the victim and alleged perpetrator a reasonable distance apart, while considering that in most probability, the rape or assault will have constituted a serious breach of discipline, and that allowing the perpetrator to remain in school will seriously harm the education or welfare of the victim. Support for the perpetrator (and sanctions) will be considered on a case-by-case basis while remembering that harmful sexual behaviour in young children may be a symptom of either their own abuse or exposure to abusive practices and or materials.

When referring to consent, it is understood that consent means a freedom and capacity to choose to sexual activity. It is accepted that consent may be given to one form of sexual activity but not to another and can be withdrawn at any time during sexual activity. Staff training will be based around

Sexual Violence and Sexual Harassment Between Children in Schools and Colleges to ensure that a culture of unacceptable behaviour is not normalised which may prevent reports of behaviours related to abuse being made. School will consider whether any disciplinary action is appropriate against the individual who deliberately invented an unsubstantiated, unfounded, false or malicious reports as per the behaviour policy.

The School will look out for potential patterns of concerning, problematic or inappropriate behaviour. In so doing, it will be decided what course of action is needed but also whether there are wider cultural issues within the School that enabled the inappropriate behaviour to occur and what, therefore, can be done to minimise the risk of it happening again.

Managing Online safeguarding and the making and sharing of nudes or semi-nudes

Any online incidents that raise safeguarding concerns should be handled by the DSL or Deputy DSLs and reports made to Children's Social Care and the Police as appropriate.

The following online incidents must always be reported to the Police:

- Discovery of indecent images of children and young people
- Behaviour considered to be 'grooming'; whether it be perpetrated by those intending to groom for extremist or sexual purposes
- Sending of obscene materials

On discovery of illegal content, the equipment or materials found should not be tampered with and advice should be sought from the Police. Computers or other devices should not be switched off unless instructed to do so by the Police. Further access to the illegal content should be prevented by keeping other people out of the area. If necessary the monitor itself can be turned off but the computer should remain as it was found (DO NOT shut the machine down). No attempt should be made to download, print or send any materials found.

All illegal content must be reported to the Police and the Internet Watch Foundation (www.iwf.org.uk). The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. It is a criminal offence to possess, distribute, show and make indecent images of children, also referred to as nudes or semi-nudes.

If an incident of sharing nudes and semi-nudes comes to the School's attention, the incident should be referred to the DSL as soon as possible. There will be subsequent interviews with the pupils involved if appropriate. Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is a concern a child has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately. All children involved, whether perpetrator or victim, should be treated as being 'at risk'. Judgement or blame should never be apportioned.

School recognises that the motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. However, creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex. Hence the need to refer such matters to the DSL.

The making or sharing of nudes and semi-nudes, either self-generated or created by another person is a serious Child Protection issue that must be reported to the DSL. The taking and sharing of nudes, including those generated using AI of under 18s is a criminal offence and thus must be reported to the

Police; any member of staff can make a referral, and the DSL must be informed of this. Such images may also be digitally altered or wholly generated using artificial intelligence ('deepfakes' or 'deep nudes'), and these must be treated in the same way, even without the original/real photograph. The CEOP guide *Understanding and responding to AI-generated Child Sexual Abuse Material* is a regularly updated resource that can support staff in this fast-changing technology concern.

All incidents of making or sharing nudes or semi-nudes is a breach of the Behaviour Policy and a safeguarding matter, regardless if they are consensual or non-consensual. All incidents will require a proportionate response that considers the age, development and circumstances of the pupils involved, as well as any elements of coercion, exploitation or vulnerability. Members of staff must not intentionally view any nude or semi-nude images that are reported to them, or copy, print or share these images. If staff are made aware of such images on a device, this device must be confiscated, turned off and stored securely before it can be passed to the relevant authorities. See government guidance for education settings: Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK
See, also, the ICT and Online Safety Policy for further information.

Online Safety

Online Safety is a safeguarding issue and the School has a duty to ensure that every student in its care is safe. Online safety is a continuous and interrelated theme throughout the curriculum, teacher training and parental engagement within the School. This applies equally to the 'virtual' or digital world. The School will ensure that appropriate filtering methods are in place to ensure that students are safe from all types of inappropriate and unacceptable materials. It is recognised that appropriate filtering and monitoring systems, in school, can limit children's exposure to risks and provide them with a safe environment to learn. As such School is committed to meet Filtering and Monitoring standards (See Online Safety Policy).
The School uses Smoothwall for both filtering and monitoring and reporting goes to the DSL and Deputy DSLs for review and action. Monitoring of key logging links automatically with the School Child Protection Online Monitoring System (CPOMS) to ensure that records of concerns are maintained. Smoothwall regularly updates its systems to ensure that it is in line with the most up-to-date concerns. These systems will be reviewed annually by the DSL with the Director of Digital Solutions and a record of this will be stored by the DSL.

There are four areas of risk:
Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying
Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. Please report phishing concerns to the Anti-Phishing Working Group (https://apwg.org/).

Mobile phones, tablets and cameras are only allowed in EYFS under strict guidelines. Staff owned mobile phones are prohibited in the reception classrooms and are kept locked in secure classroom cupboards throughout the School day. The use of personal cameras, videos and iPad by all adults and / or children is also prohibited in EYFS. A mobile phone is used in After School club to receive emergency calls from parents, but this phone does not have camera capability. School cameras, video recording equipment and iPad are used by staff and children to record evidence for the Learning Journey and profile.

The introduction of Microsoft Teams as a teaching tool, enabled pupils to have instant contact to staff outside of school hours. Teams 'chat' between pupils in Years 7-11 has been disabled. Sixth Form pupils still have access to Teams 'chat'. Staff will be advised to share with the DSL whenever a pupil contacts them via Teams or email during out of school hours, including weekends and holidays, in circumstances where the communication exceeds queries about schoolwork, i.e. is of a Pastoral nature. See the Staff Code of Conduct and the Communication Guidance Document for more information on the appropriate use of Teams.

Information on the use of AI for educational purposes can also be found in the Artificial Intelligence Policy.

Mobile Phones and Devices

The School recognises that schools should be 'mobile-phone free by default' and has measures in place for different phases of the School so that pupils are safeguarded for potential harm from mobile devices. The School does not operate a Bring Your Own Device (BYOD) scheme. More information can be found in the Mobile Phone and Personal Electronic Devices Policy.
Pupils in all phases of the Preparatory School are not permitted to have access to a mobile phone or personal electronic device during the school day. Pupil-owned smartphones or smart devices are not permitted in the Preparatory School. On rare occasions when an analogue phone is brought to School it must be handed in to the Prep Receptionist.

The School advises that pupils in Years 7-9 do not have a smartphone and we prefer that pupils do not bring mobile phones to School. If mobile phones are brought to School, then all pupils in Years 7-11 must lock their phones into their Yondr pouch for the duration of the School day so that it cannot be accessed.

In recognition of their increased independence and responsibility, students in the Sixth Form are permitted access to their mobile phones and other personal electronic devices, but they should only be used at certain times and locations. use is limited to Sixth Form only areas, which are the Sixth Form Centre and the Mezzanine for Sixth Form students in the Library. They must not be seen in any other area of the School and must not be in view of younger students.

Sanctions for breaches of the above can be seen in the Mobile Phone Policy.

Escalation procedures

Occasionally, there may be disagreements between the view of the DSL and external agencies about the decisions made regarding safeguarding decisions such as:
Whether certain behaviour constitutes child maltreatment
Whether circumstances warrant a child protection response
The need for, or detail of, a Child and Family, Child in Need or Child Protection Plan

The DSL has a responsibility to challenge those colleagues representing external agencies when it is believed that they have failed to recognise child maltreatment and/or their response leaves a child at risk of significant harm. In such situations, every effort should be made to reconcile these differences within one working day. If this is not possible, referral should be made, in writing, to a person in a management position. Any subsequent change in action should be confirmed in writing and a date agreed for review. If this decision affects the plan for the child, then the relevant procedures for reviewing the plan should be invoked. Disagreements about the detail of a child protection plan must be referred to the Service Lead for Safeguarding for resolution as soon as possible and within no more than 15 working days.

Disagreements about principle or cumulative concerns about an agency's thresholds or practice must be referred to the Local Safeguarding Partnership. In those situations when a child is, finally, referred to multi-agency services, the child's needs will be monitored closely by the DSL / Deputy DSLs and referred again if it is believed that the child's needs are not being met by universal services.

A member of staff may also consider that the DSL or Deputy DSLs have not acted, appropriately, on a concern raised about the welfare of a child. In these situations, any member of staff can refer their concerns to children's social care directly.

Child Protection Records

Information relating to individual cases is strictly confidential and actual and suspected child abuse records are kept separately from the individual student record. The DSL keeps child protection records and the School Nurse keeps the individual child's medical records.

Individual student records stored are marked by a blue dot if confidential information is stored elsewhere, either by the School Nurse or by the DSLs in the Senior School or the Preparatory School. At the start of each school year, the DSLs in the Senior School and the Preparatory School produce an annual list of current students for whom the DSLs hold child protection records. These records are updated and reviewed regularly amongst the DSLs to ensure that all records match.

Child protection records are stored in a locked cabinet by the DSL in the Senior School for twenty-five years after the child has left school, according to the requirements of the School's insurance company. Records pertaining to sexual abuse or child sex exploitation will be kept indefinitely. Information on girls in the Preparatory School is also stored in a locked cabinet in the office of the DSL in the Preparatory School. The Head of the Preparatory School will forward copies of confidential Child Protection records to the Senior School DSL when a child leaves the Preparatory School and moves to the Senior School.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. Records should include:

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

Leavers / Withdrawal from the School

The School should be satisfied that alternative provision meets the child's needs. In the case of a child (below the age of eighteen) who is leaving this School to attend an alternative school or college and for whom there has been a child protection concern:

- Copies of official child protection records will be passed on by the DSL to the DSL at the receiving school within 5 days of the new term/the move date.
- A receipt stating that these records have been received is requested when such records are passed on.
- If the student is on the Child Protection Register, the DSL will contact her Social Worker.

To promote the welfare and protect the safety of the child it may be necessary for information to be shared with future schools.
When deciding what information to share, the DSL will:

- Consider the relevancy of the information, including to the current safeguarding risk,
- Consider what is necessary for the receiving setting to know,
- Ensure that shared information is clearly presented and appropriately contextualised.

In the case of any child of compulsory school age for whom parents have given notice, the Registrar will:

- find out the name and address of the receiving school and check that the girl has started at the new school
- inform the local authority of the destination school, or a parent's intention to home-educate their daughter or if there is no known destination school
- inform the local authority where the pupil lives if the child who is due to start at MHSG, does not turn up
- check, if parents have said that they are moving abroad, with the school to which they are moving
- keep a summary log of children who have left the school

In the case of a child who has to leave due to non-payment of fees, the School will inform the child's local authority to check that the child has been enrolled at another school. The Registrar will keep the DSL informed at each stage of the procedures outlined above.

Attendance / Missing From Education

Monitoring the attendance of pupils in the School forms part of the safeguarding responsibilities of all members of staff. Indeed, a child going missing from education, especially when they are repeatedly doing so, can act as a vital warning sign of a range of safeguarding risks including; abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems and substance abuse.
Note: A child missing in education (CME) is of compulsory school age who is not receiving a suitable education. A child absent from education is a child who is absent from the school they are expected to attend. A school's response to persistently absent pupils and children missing in education, helps prevent and identify abuse as well as help identify the risk of an individual becoming a child missing education in the future. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

If a student's attendance falls below 90% and parents have not provided a letter from a GP or other medical expert that the absence is due to valid medical reasons, then the pupil's Local Authority may be informed. The local multi-agency safeguarding team will also be informed if any pupil fails to attend school regularly (15 days cumulatively in the year) or has been absent without the School's permission for a continuous period of ten school days or more. A pupil's name may be deleted from the admission register on certain grounds. These are:

(i) when the pupil has been taken out of school to be home educated
(ii) when the family has apparently moved away
(iii) when the pupil has been certified as medically unfit to attend
(iv) when the pupil is in custody for more than four months
(v) when the pupil has been permanently excluded

See the Attendance Policy for more information.

The Government's missing children and adult's strategy can also be accessed for further information.

Guardianship

For students from overseas and for students whose parents are temporarily living overseas or at a different location from the child, the School will require from parents details of the arrangements they have made for their daughter's care:

- Name and contact details of a responsible carer (this may involve a private fostering agreement)
- Clear authority about the names of persons to whom the School may release the child.

If a visa is required, all details provided must be in accordance with the regulations required by the UK Border Agency, if we are to support the child's application. Private Fostering: The DSL will ensure that all staff should be alerted to the possibility of Private Fostering and such arrangements must be brought to the attention of the DSL or Deputy DSLs who will then notify the local authority to check the arrangement is suitable for the child.

Managing Allegations of Abuse Against Adults in the School: staff, supply staff, trainee teachers, volunteers and contactors. (see also Appendix 5 on Page 52)

Corporal punishment is against the law and will not be used by anyone in this school. There will be no physical contact by a member of staff that is deliberately intended to punish a student or cause pain, injury or humiliation.

There may be rare instances of suspected abuse being reported where a member of the teaching or support staff or a volunteer or a governor is implicated as the abuser. Any suspicions should be reported at once to the Head Mistress who will follow the Managing Allegations of Abuse against Adults who Work with Children and Young People policy (see Appendix Five).

If the allegation involves the Head Mistress, suspicions will be reported to the DSL and by her directly to the Chair of Governors. In such situations, the Head Mistress will not be informed at this stage.

The School will follow the additional EYFS requirement to inform OFSTED as soon as is reasonably practicable (and no later than 14 days) of any allegation of serious harm or abuse by any person 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. The School will also inform OFSTED of the action taken in respect of these allegations.

Restrictive Interventions

Restrictive intervention is 'a means to prevent, restrict, or subdue movement of the body, or part of the body, of a pupil'. Advice from the Government Guidance will be adhered to.

It is acknowledged that the term 'reasonable force' covers a broad range of actions used by staff, which involve a degree of physical contact to control or restrain children. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time.

All members of school staff have a legal power to use reasonable force in certain circumstances, to prevent or stop a pupil from:

- causing injury to themselves or others
- committing a criminal offence
- damaging property
- causing disorder among pupils at the school, whether during a teaching session or otherwise

Staff who are likely to need to use reasonable force and/or other restrictive interventions should be adequately trained in its safe and lawful use and in preventative strategies.

A member of staff can use such force as is reasonable to search for legally prohibited items, but not to search for items banned under the school rules only; this is detailed in the Behaviour and Discipline Policy.

Recording and reporting duties

All significant incidents in which a member of staff uses force on a pupil must be recorded. Incidents must be recorded as soon as practicable after the event. It should be recorded by the staff member(s) involved and they should endeavour to do this no later than the same day. This should be made to the DSL who will keep the record.

The School record of the incident must include:

- names of pupil and staff directly involved
- any relevant needs or circumstances of the pupil, including whether the pupil has identified SEND
- time, date, location and approximate duration of the intervention
- in the case of reasonable force being used, a brief account of the incident, any known identified or potential triggers if known, any preventative or de-escalation strategies used, and the type and degree of reasonable force applied
- why the intervention was deemed necessary
- details of any physical injuries sustained
- any post-incident support, such as details of any medical treatment for injuries or other adverse impacts

A report must be made to the parents, in writing, and should include:

- time, date, location and approximate duration of the intervention
- brief account of why the intervention was assessed as necessary
- brief account of what type of force was applied, and the degree of force
- details of any physical injuries sustained, if applicable

In addition to sharing this in writing, parents will be invited into School for a follow-up meeting.

The duty to report does not apply if doing so would likely result in serious harm to the pupil; in this case it should be made to any parent who it can be without resulting in harm or, if there are none, to the local authority where the pupil resides.

One-to-one Teaching

Many pupils receive one-to-one teaching in the contexts of Music, Performing Arts and, on occasion, Sport. All teachers responsible for such tuition are required to read and understand the School's Child Protection and Safeguarding policy, KCSIE (Part One), the Staff Code of Conduct and Whistle Blowing Policy. Members of the peripatetic Music and Performing Arts staff also receive the usual staff training on safeguarding and child protection every year – alongside the rest of the School staff.

Communication with Parents

This policy is made available to parents of students and parents of prospective students via publication on the internet website and a copy is available for inspection on the school premises during the school day. Parents are notified that the Safeguarding and Child Protection Policy is on the website via the Parent Handbook. Parents are also alerted to on-line dangers through information sessions and welcome evenings. In these instances, School will communicate with parents the importance of children being safe online. Advice and information will be shared to enable parents to be aware of what their children are being asked to do online.

Looked After Children (Children in Care)

A child who is looked after by a Local Authority, subject to a care order or who is voluntarily accommodated by a Local Authority is termed a Looked After Child. Both DSLs in the Senior School

and the Preparatory School are the designated members of staff to safeguard and promote the welfare of each Looked After Child within the School. Further details can be found in Appendix 2.

Staff Training, Including Induction Procedures

The school has a commitment to the regular training of its staff on how to protect children.

- As part of the Staff Induction, School will ensure that the systems set out in the following policies, which support safeguarding are explained:
  - Child Protection and Safeguarding Policy (including how to deal with child-on-child abuse).
  - Behaviour Policy (including measures to prevent bullying, cyberbullying, prejudice-based and faith targeted abuse, religious bullying and harassment (any discriminatory bullying) as these can become safeguarding concerns).
  - Staff Code of Conduct (including low-level concerns, allegations against staff and whistleblowing).
- New staff / volunteers receive verbal training on child protection from the DSL during the New Staff INSET before they take up post, together with the Child Protection and Safeguarding Policy and Procedures, Part One of KCSIE, the Staff Code of Conduct, the Behaviour Policy and the Whistle Blowing Policy.
- New staff / volunteers are given an induction upon starting at the School in September, which includes familiarisation with the School's Child Protection and Safeguarding policy (including the identities of the DSL and the Deputy DSLs), Part One of KCSIE, the Staff Code of Conduct, the School's Whistle Blowing Policy and the Behaviour Policy. In addition, all new staff are asked to complete the EduCare online course: Safeguarding Young People and receive face-to-face training from the DSL.
- Staff / volunteers joining the School at different points throughout the year will receive the same documentation, training and will complete the course.
- All staff will receive appropriate in-depth training at least once every three years with updates as required but at least annually to provide them with the information and knowledge to carry out their responsibilities effectively. This training will include basic safeguarding information about the School's policies and procedures including on-line safety, signs and symptoms of abuse (emotional, physical, sexual, neglect and exploitation), Prevent/Channel and indicators of vulnerability to radicalisation, how to manage a disclosure from a child including a report of child-on-child abuse (including, but not limited to, prejudice based and faith targeted abuse, sexual violence and sexual harassment), as well as when and how to record a concern about the welfare of a child.
- The DSL and the Deputy DSLs and the Head Mistress will undergo training in inter-agency working and updates regularly but at least annually. Training should be provided by, or to the standards set by, the MSP.
- All staff are issued with updates of KCSIE when they are published and sign to say that they have read and understood the updates.
- The Child Protection and Safeguarding Policy & Procedures are updated annually and are available on the School Intranet. All staff / volunteers are expected to sign a memorandum indicating that they have read and understood the policy. These records are stored in individual personnel files.
- Updated regulations and information relating to safeguarding / child protection are given to all members of staff in staff meetings.
- Staff are trained on how to keep children safe online by being adequately equipped to understand, identify and mitigate the risks of new technology, which includes the potential dangers of generative AI and how this can be used to create child sexual abuse material.
- The DSL meets with the Governor who oversees child protection practices on a termly basis so that arrangements can be monitored and, if necessary, reviewed.

Safer Recruitment Procedures

The School is committed to safer recruitment processes as set out in KCSIE, the Safeguarding Vulnerable Groups Act 2006 and other relevant safer recruitment guidance to ensure that no-one works within the School who is unsuitable to work with children. The relevant procedures are set out in Appendix 6 on Page 62.

The School is clear that volunteers must not be permitted to begin working in the EYFS of the School until the School has received the volunteer's enhanced DBS certificate including barred list information.

Disqualification

The effect of the Childcare (Disqualification) Regulations 2009 applies to staff in early years provision, to those who work in later years provision for children who have not attained the age of 8 as well as the management of such provision even though they may not work in the early years or relevant later years provision themselves. The regulations apply to all provision for children in that age range during and outside school hours (including breakfast club and after school care). The School is committed to ensuring that no one is employed if they are 'disqualified'. The grounds of disqualification are not only that a person is barred from working with children (included on the Children's Barred List) but also include in summary, that:

- being on the DBS Children's Barred List
- being cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad
- being the subject of certain other orders relating to the care of children
- refusal or cancellation of registration relating to childcare or children's homes or being prohibited from private fostering

Staff who join the School are asked to provide relevant information about themselves in the form of a self-declaration. This self-declaration is kept in the member of staff's personnel file. Ofsted will be informed if a person falls within one of the disqualification criteria. Staff are reminded, annually, of their duty to disclose any information relevant to the disqualification criteria.

Homestay during exchange visits

School does not currently allow pupils to stay with host families on residential trips visits. However it is recognised that should this change, the regulations outlined in Part Three of KCSIE 2026, will be imposed and adhered to.

Monitoring the effectiveness of the policy and procedures

The following checklist will be used by the School:

- Is there a policy in place?
- Has the policy been reviewed by the Governors annually, including the nominated Safeguarding Governor?
- Has the Head Mistress reviewed, in writing, the School's safeguarding policy and procedures annually?
- Have the School's recruitment policy and procedures been checked by the Head Mistress against current statutory guidance on an annual basis?
- Is the central record of recruitment checks in place, in line with current regulations and up to date?
- Are individual employment records in order?
- Is the staff training record for child protection up to date?
- Is there evidence of collaboration with Manchester safeguarding Partnership (MSP)?
- Are students able to tell you what they should do if they are suffering abuse or neglect?

- Are staff/ volunteers able to tell you accurately what they should do if they suspect abuse / neglect and whom they should tell?
- Are staff able to tell you accurately what they should do if a student alleges abuse by a member of staff?
- Are staff following the guidance for safe working practice / staff code of conduct?
- Is the policy available on the school website?

Review of policy

This policy is reviewed and updated at least annually.
Policy updated by the Deputy Head (Pastoral) and Designated Safeguarding Lead (DSL) August 2026
Approved by the Full Governing Body

Appendix 1: Abuse, Neglect and Exploitation and Vulnerable Children

DEFINITIONS, SIGNS AND SYMPTOMS OF ABUSE, NEGLECT AND EXPLOITATION

School staff are in a unique position to notice any change in appearance, behaviour, attendance and circumstances. All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery. When children are taking part in swimming, team games or other physical education activities, there is an opportunity to notice injuries, marks or bruises which could indicate abuse. Any concerns should be referred to the DSL. This is in response to both the physical and mental wellbeing of the child and bearing in mind the impact of Contextual Safeguarding and Adverse Childhood Experiences.

All staff, but especially the DSL, should consider whether children are at risk of abuse or exploitation outside of their families. This can include, but is not limited to, sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse – including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, country lines and radicalisation,

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

All staff must be alert to the potential harm of racism, prejudice-based and faith-targeted bullying and report any concerns that they are aware of to the DSL. Staff should be vigilant in challenging such racism and discrimination in order to demonstrate that this behaviour is unacceptable and not in line with our Behaviour Policy. Both the victim and the perpetrator of this behaviour should have appropriate support put in place.

Some of the following signs might be indicators of abuse, neglect or exploitation:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who display a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

Child-on-child abuse (including harassment and violence)
All staff should recognise that children can abuse their peers. This abuse can happen both inside and outside of school and online and even if there are no reports in school of this occurring it does not mean it is not happening, it may be the case that it is just not being reported. All staff should address/challenge abusive behaviours between peers and report them to the DSL, as with all form of abuse, in line with protocol.

Abuse of this type can be physical, sexual or emotional. This child-on-child abuse can manifest itself in various ways and is most likely to include but is not limited to; bullying (including cyber bullying), gender-based violence/sexual violence, sexual harassment, upskirting and sharing nudes and semi-nudes (sexting), physical abuse such as hitting, kicking, biting, hair pulling and initiation/hazing (action without consent) type violence and rituals. Sharing nudes and semi-nudes can but does not always constitute abusive behaviour. Upskirting typically involves taking a picture under a person's clothing without them knowing and is a criminal offence.

Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm; (b) where there is an element of coercion or pre-planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL. The DSL will decide how each allegation of child-on-child abuse will be recorded, investigated and dealt with according to the particular case. It is recognised that victims should be given as much control as is reasonably possible over decisions regarding how the investigation will proceed.

Procedures to minimise the risk of child-on-child abuse include an emphasis on staff and students taking responsibility for creating an encouraging and respectful school ethos and clear anti-bullying and behaviour policies. School ethos is under-pinned by the principle of a zero-tolerance approach to abuse.

Child-on-child abuse should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". This can lead to a culture of unacceptable behaviours, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Older pupils may attempt to recruit younger pupils and children suffering from sexual exploitation themselves can be forced to recruit other children under the threat of violence. When one or more pupil abuses another pupil and when there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm, then this abuse will warrant a response under Child Protection procedures rather than under the School's Anti-Bullying policy, where upon the child will be supported accordingly. In the event of disclosures about child-on-child abuse, all children involved – whether perpetrator or victim – are treated as being at risk and will be referred to the DSL or Deputy DSLs who will contact local agencies and make a referral where appropriate. To manage situations where a Safeguarding risk is present, a risk assessment will be prepared along with a preventative, supervision plan to minimise future risks.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- causing someone to engage in sexual activity without consent, such as forcing, causing or inciting someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element). For further information: The Marie Collins Foundation

Serious violence

Indicators, which may signal children are at risk from, or are involved with serious violent crime:

- 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,
- signs of assault or unexplained injuries.
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

Factors which increase the likelihood of involvement in serious violence

- involvement in serious violence,
- being male,
- having been frequently absent or permanently excluded from school,
- having experienced child maltreatment,
- having been involved in offending, such as theft or robbery.

Sexual violence and sexual harassment

Sexual violence refers to offences as described under the Sexual Offences Act 2003. This includes; rape, assault by penetration and sexual assault. Sexual harassment is 'unwanted conduct of a sexual nature'. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal), to any age and gender and are never acceptable. School will maintain an attitude of 'it could happen here'. It is recognised that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. As such there is a zero-tolerance approach to sexual violence and sexual harassment in the School. Such behaviour is never acceptable and will not be tolerated

It is important that all victims are taken seriously and offered appropriate support. It will be made clear in school that sexual violence and sexual harassment are never acceptable and will never be tolerated. Dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh", "girls will be girls' or "boys being boys" is never acceptable and as such pupils will be taught to challenge behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts, vaginas and penises. It is understood that dismissing or tolerating such behaviours risks normalising them. SEND, LGBT children and those with a social worker and/or are being supported by the DSL, are at greater risk of sexual violence and/or harassment

Incidents of sexual violence and sexual harassment and/or behaviours, can be associated with factors outside the school, including intimate personal relationships. Whilst any report of sexual violence or

sexual harassment should be taken seriously, it is more likely that girls will be the victims of sexual violence and sexual harassment.

KCSiE 2026 signposts the following:

- The Centre of Expertise on Child Sexual Abuse
- The Children's Society: Preventing Child Sexual Exploitation

Preventing Radicalisation and Violent Extremism: The Prevent Duty

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

Extremism - is the vocal or active opposition to British fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation - refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism - is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause

The Prevent duty is seen as part of schools' and colleges' wider safeguarding obligations. The Prevent duty guidance defines extremism as *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faith and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas."* The School values fundamental British values and seeks to protect its pupils and staff from all messages of violent extremism and ideologies including those linked to, but not restricted, to the following: Far Right/New Nazi, White Supremacist ideology, Islamist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights groups.

In accordance with KCSIE, the School has a duty to protect children from being drawn into terrorism including extremism and radicalisation. If a member of staff is concerned that a child may be at risk of being drawn into terrorism, the referral guidelines outlined in this policy will be followed as this is considered a safeguarding concern.

As is the case for all safeguarding concerns, it is important that children receive the right help at the right time to prevent issues escalating and it is therefore important to act on and refer any early signs of potential radicalisation to the DSL or Deputy DSLs.

The following risk assessment reflects the due regard of the School to the need to prevent pupils from being drawn into terrorism / extremism. 'Extremism' is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The risk assessment refers, in part, to Prevent duty guidance: for England and Wales document, 2023. It forms part of the School's wider safeguarding duties. The Risk Priority below is set before the consideration of control measures put in place by the School.

Foreseeable Hazard/what could happen?	Who is at risk?	Severity of harm ABC	Risk factors	Probability 123	Risk Priority A1...C3

Pupil falls victim to radicalization /extremist ideology	All pupils	A	• Pupils' ability to access the internet in school time. • Pupils influencing each other through discussion. • External speakers visiting school to talk to pupils. • Vulnerability as a result of age / mental health etc. • Staff not reporting concerns relating to an individual pupil.	I	A1

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. Statutory Guidance.

Controls:

- Actively promote Fundamental British Values through Well Being and the wider curriculum (see Spiritual, Moral, Social and Cultural Policy).
- Encourage pupils to challenge argument through the teaching of debate / argument skills. This can build pupils' resilience to radicalization by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision making.
- Characteristics such as resilience, determination, self-esteem and confidence are developed through Well Being lessons and Theme Weeks.
- All staff to monitor the attendance of girls in their tutor group and alert the DSL or Deputy DSLs if it is suspected that a pupil has travelled to, or is planning to, travel to areas associated with extremism (e.g. Syria).
- DSL to record any concerns noted by individual staff and use professional judgement in identifying students who might be at risk of extremism. DSL is log concerns highlighted by IT filtering and monitoring systems in relation to extremism. Such records are kept, monitored and reviewed on a regular basis to assess risk.
- DSLs / Deputy DSLs to receive *Advanced Prevent* training.
- Staff trained on the dangers of extremism through regular safeguarding updates in staff meetings and through the distribution of the Prevent Duty risk assessment.
- Staff and Governors to complete DfE approved basic training on the Prevent Strategy and the work of Channel. Channel Guidance
- Staff trained on the warning signs of a student being radicalized – e.g. through changes in behaviour (such as social isolation), voicing or writing views which may suggest opposition to Fundamental British Values.
- Liaise closely with parents / family who raise concerns about signs of radicalization in their daughter. However, consent for a referral is not required from parent/s if a child is believed to be at risk of significant harm.
- All pupils to receive lessons on internet safety and encouraged to report any extremist ideology that they may experience online.
- Effective use of filtering and monitoring systems, in line with the standards and as required by The Prevent duty.
- Encourage characteristics such as resilience, courage and self-esteem so that students are less susceptible to extremist ideology and can resist pressures.

- Usual safeguarding measures in place regarding DBS checks of all staff in regulated activity with students.
- Close monitoring by members of SLT of speakers and content of religious assemblies.
- All members of staff to inform Deputy Head Mistress (Pastoral), in writing, of visiting speaker/s who will be supervised but not subject to a DBS check (e.g. subject related speakers).
- Close monitoring by relevant staff of charities being supported by form / year groups.
- Trip leaders to keep passports of all students when abroad.
- All policies to ensure adherence to the equality of all students.
- Staff provided with clear instructions as to how to record any concerns about an individual student.
- DSLs to liaise with external services if student is at risk of radicalization, this must include contact with GMP and Children's Social Care.

Designated Person/s to liaise with GMP Channel programme as and if appropriate. An individual's engagement with the programme is entirely voluntary and provides a mechanism for an early-stage intervention.

There are four main categories of abuse and neglect: physical abuse, emotional abuse, sexual abuse and neglect. Each has its own specific warning indicators.

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. 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 child. Physical abuse can also occur outside of the family environment.

Some of the following signs may be indicators of physical abuse: any injuries not consistent with the explanation given for them; injuries which occur to the body in places which are not normally exposed to falls or rough games; injuries which have not received medical attention; reluctance on the part of a child to change for, or participate in, games or swimming lessons; bruises, bites, burns and fractures which do not have an accidental explanation; object shaped bruises; inconsistent accounts given by the child for the cause of injuries.

Fabricated or induced illness is illness in a child which is fabricated or induced by a parent or carer. A child who is being abused in this way can be presented for medical assessment or care, usually persistently, often resulting in multiple medical procedures for the child and on occasions limiting the child's ability to participate in activities promoting his/her development. Child welfare concerns arise when the child's normal, daily activities are being curtailed beyond that which might be expected for any medical disorder from which the child is known to suffer.

- Signs of induced illness can involve a parent:
- Pretending the child is ill or has been ill.
- Exaggerating real illness
- Making the child ill, e.g. by poisoning
- Making false allegations of abuse
- Presenting the child as disabled (including learning disability)
- Tending to threaten legal action too readily
- Being over-friendly with staff but abusive if staff do not comply with their wishes
- Presenting with some medical knowledge and trying to intimidate professionals
- Being over-anxious or less attentive than one would expect

- Pretending to be ill her/himself
- Being present with the 'victim' when she has alleged or real symptoms or signs of illness
- Denying the aetiology of the child's illness

Signs of induced illness can also include:
- Frequent and unexplained absences from school, particularly from PE lessons.
- Regular absences to keep doctor, optician, or hospital appointments.
- Repeated claims from carers that the child is frequently unwell and that he/she requires medical attention for symptoms that, when described, are vague in nature, difficult to diagnose and which teachers themselves have not noticed, e.g., headaches, stomach aches, seizures, dizzy spells, frequent contact with health professionals or referrals for second opinions.
- Overuse / inappropriate use of drugs, including non-prescription drugs such as Calpol, laxatives etc.
- Refusal of permission for school medicals.
- Frequent illness, treatments, or ailments not consistent, or considered to be excessive, in relation to a child's disability

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, staff will be able 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. It may include verbal abuse (e.g. criticism, name-calling).

Emotional abuse may involve serious bullying – including online bullying through social networks, online games, online challenges, online hoaxes, or mobile phones – sometimes by a child's peers.

Some of the following signs may be indicators of emotional abuse: depression, aggression, extreme anxiety, changes or regression in mood or behaviour; obsessions or phobias; sudden underachievement or lack of concentration; seeking adult attention and not mixing well with other children; negative statements made by the child about herself; acts of aggression or cruelty to others; extreme shyness or passivity; stealing and lying.

3. Sexual abuse and 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. A victim should never be given the impression that they are creating a problem by reporting sexual violence or harassment. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) 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, causing or inciting 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.

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 you 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 (CSE) involves exploitative situations, contexts, and relationships. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. 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. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing, causing or inciting 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.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- 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; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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

The following vulnerabilities have been seen in children prior to child sexual exploitation abuse:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues and parental criminality).
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of honour-based violence, physical and emotional abuse, and neglect).
- Recent bereavement or loss.
- Gang association either through relatives, peers or intimate relationships (in cases of gang associated CSE only).
- Attending school with young people who are sexually exploited.
- Learning disabilities.
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families.

- Friends with young people who are sexually exploited.
- Homelessness.
- Lacking friends from the same age group.
- Living in a gang neighbourhood.
- Living in residential care.
- Living in hostel, bed and breakfast accommodation or a foyer.
- Low self-esteem or self-confidence.
- Young carers.

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;
- Children who regularly miss school or education or don't take part in education.

See Department for Education Child Sexual Exploitation

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of Child Criminal Exploitation:
- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and • children who regularly miss school or education or do not take part in education.

See Department for Education: Sexual violence and sexual harassment between children in schools

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. CSE and CCE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". It is the criminal exploitation of children to carry drugs and money from urban areas to suburban and rural areas, through the use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online

using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A referral to The National Referral Mechanism, (Modern slavery and human trafficking) will be considered if it is suspected that a child has been missing from school for the purpose of transporting drugs. See also the Modern Slavery statutory guidance. It is recognized that county lines exploitation can affect any young person under the age of 18. As with any exploitation, such activity may appear consensual, can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It is understood that such abuse can be perpetrated by individuals or groups, males or females, and young people or adults and is typified by some form of power imbalance, which may be due to a range of factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of indicators for CSE and CCE, some are additional specific indicators that may be present where a child is criminally exploited through involvement in county lines:

- gone missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing
- increased absence from school
- a change of friendship with older individuals/groups
- a significant decline in performance
- unexplained gifts or new possessions

Further information can be found: Home Office: Preventing youth violence and gang involvement and Home Office and The Children's Society County Lines Toolkit For Professionals

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. For further information view Cyber Choices

Cyber-dependent crimes include:

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

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

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

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

4. Neglect

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

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.

Specific Safeguarding Issues

In addition to identifying the types of abuse and neglect listed above, staff also need to be aware of specific Safeguarding issues, be able to recognise indicative signs and pass on any concerns to the DSL.

Honour or faith-based Abuse (HBA): Honour or faith-based abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. School will be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take

Female Genital Mutilation (FGM) is illegal in the UK and is a violation of the human rights of girls and women. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. From October 2015 it has been mandatory for **teachers** to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. The DSL should also be informed, unless the teacher has good reason not to. The DSL or Deputy DSL should involve children's social care as appropriate.

Telephone Manchester Police on 101 or FGM Helpline: 0800 028 3550

The following may be indicators of risk:

- The family comes from a community that is known to practice FGM;
- Any female child born to a woman who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family;

- Any female who has a relative who has already undergone FGM must be considered to be at risk;
- The socio-economic position of the family and the level of integration within UK society can increase risk.

Indicators that FGM may soon take place:
- Parents state that they or a relative will take the child out of the country for a prolonged period;
- A child may talk about a long holiday (usually within the school summer holiday) to her country of origin or another country where the practice is prevalent;
- A child may confide that she is to have a 'special procedure' or to attend a special occasion;
- A child may tell other children about it.

The following may be short-term indicators that FGM has taken place:
- Prolonged absence from school with noticeable behaviour changes on the girl's return;
- Longer/frequent visits to the toilet particularly after a holiday abroad, or at any time;
- Some girls may find it difficult to sit still and appear uncomfortable or may complain of pain between their legs;
- Some girls may speak about 'something somebody did to them, that they are not allowed to talk about';
- A child may talk about a `special procedure' that took place when on holiday;
- Young girls refusing to participate in P.E regularly without a medical note; • Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain.
- Intense pain and/or haemorrhage that can lead to shock during and after the procedure;
- Haemorrhage that can also lead to anaemia;
- Wound infection, including tetanus;
- Urine retention from swelling and/or blockage of the urethra;
- Injury to adjacent tissues;
- Fracture or dislocation as a result of restraint;
- Damage to other organs.

In the UK, girls and women affected by FGM will manifest some of these long-term health complications. They may range from mild to severe or chronic.
- Excessive damage to the reproductive system;
- Uterine, vaginal and pelvic infections;
- Infertility;
- Cysts;
- Complications with menstruation;
- Psychological damage; including a number of mental health and psychosexual problems, e.g. depression, anxiety, post-traumatic stress, fear of sexual activity. Many children exhibit behavioural changes after FGM, but problems may not be evident until adulthood;
- Abscesses;
- Sexual dysfunction;
- Difficulty in passing urine;
- Increased risk of HIV transmission/Hepatitis B/C – using same instruments on several girls;

Forced Marriage became a criminal offence in June 2014. In addition, since February 2023 it has also been a crime to carry out any conduct the purpose of which is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. The law includes taking someone overseas to force them to marry (whether or not the forces marriage takes place).

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is a form of child, adult and

domestic abuse and, in line with statutory guidance, is treated by such at this school. The School is sensitive to differing family patterns and lifestyles and child-rearing patterns that vary across different racial, ethnic and cultural groups. However, child abuse cannot be condoned for religious or cultural reasons. The School's Safeguarding and Child Protection Policies will be used to protect a victim or potential victim of forced marriage. If a case of forced marriage is suspected, it will be viewed as a safeguarding concern. Parents and carers will not be approached or involved about a referral to any other agencies. See multi-agency statutory guidance: The Right to Choose.

Breast Ironing: also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, in an attempt to hinder development or to make them disappear.

Domestic Abuse: The Domestic Abuse Act 2021 definition of domestic abuse recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including psychological, physical, sexual, emotional and economic abuse which can manifest itself as coercive and controlling behaviour. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.

Young people may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse may become aggressive, display anti-social behaviour, suffer from depression or anxiety, or show signs of not achieving academically. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Operation Encompass is a statutory duty for police forces to provide information about domestic abuse to schools so that they can work together to provide emotional and practical help to children.

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

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247 Further information on how children who witness domestic abuse can be supported can be found at NSPCC.UK domestic abuse signs, symptoms, and effects

Safe Young Lives: Young people and domestic abuse and Domestic abuse: offer specialist sources of support for all experiencing domestic abuse.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including Local Authorities and childcare, education and other children's service providers, in the

exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Research shows that indicators that may make an individual vulnerable to radicalisation can include:

- Identity Crisis - Distance from cultural / religious heritage and uncomfortable with their place in the society around them;
- Personal Crisis - Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging;
- Personal Circumstances - Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations - Perceptions of injustice; feeling of failure; rejection of civic life;
- Criminality - Experiences of imprisonment; poor resettlement/reintegration; previous involvement with criminal groups.

Preventing Radicalisation: Extremism goes beyond terrorism. It can be defined as a vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Calls for the death of members of armed forces are also deemed as extremism. It is known that extremists can target the vulnerable – including the young – by implementing divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in society. It is known that extremists will target those who are vulnerable who could be influenced by family or friends online. Extremist may well appear to provide solutions and answers to an individual's problems. These indicators may be used to identify children who are at risk of being radicalised. As such a referral may be made to the Channel programme.

More critical risk factors could include:

- Being in contact with known extremists or extremist recruiters;
- Articulating support for violent extremist causes or leaders;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using inappropriate language, extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Seeking to recruit others into extremist ideology;
- Significant changes to appearance and/or behaviour;
- Changes in friends and mode of dress.

Vulnerable Children

All staff must be alert to the fact that all children can be at risk at harm and not make assumptions; staff work with the principle that 'it could happen here'. However, staff are also aware that certain groups may be more vulnerable to safeguarding or child protection risks.

EYFS: The School recognises that younger pupils are more vulnerable as they may not be able to communicate concerns and/or recognise that they are being abused. Staff have undergone training to recognise the signs and symptoms of abuse and understand that they must be vigilant when observing younger pupils as they cannot make direct disclosures.

Special Education Needs and Disabilities (SEND) or Physical Health Issues: All staff should recognise that additional barriers can exist for children with SEND. Any concerns about a pupil with

SEND needs to be considered by both the DSL and the Special Educational Needs Coordinator (SENCO). Staff should be aware that these children can be more prone to peer group isolation or bullying (including prejudice-based bullying), can be disproportionately impacted by bullying, without outwardly showing signs of this, can have barriers in managing or reporting abuse, or may not understand that what is happening to them is abuse. Staff should be aware that these children may not support with cognitive understanding, such as differentiating between fact and fiction in online content.

Looked after children and previously looked after children: See Appendix 2.

Children with medical conditions: All staff should recognise that the existence of a medical condition (including allergies) would not in and of itself warrant a referral to local authorities. However, staff are aware that a safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might include if the relevant information about the medical condition was not provided to School or the pupil is repeatedly sent to School without having their essential medication, which would put the pupil at risk.

Children who are lesbian, gay or bisexual: A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. LBG inclusion is taught as part of the statutory Relationships and Sex, and Health Education. All staff are aware of these vulnerabilities and the School endeavours to ensure that pupils know where they can seek support.

Children who are questioning their gender: The School recognises that some children may question their gender, including the physical attributes of their sex and how they fit into society. The School recognises that it is not uncommon for children to engage in activities that may not align with gender stereotypes and that this may be temporary for many. The School will take a child-centered approach and take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Staff should:

- Be aware of the potential vulnerabilities and safeguarding concerns, such as mental health needs, family or peer pressures, discriminatory bullying
- Promote an environment of respect where all pupils feels safe. Bullying in relation to gender, gender expression and gender identity are unacceptable and will be addressed in line with the Behaviour and Anti-Bullying policies

The School will consider requests for social transition carefully, considering the welfare of the child and their peers. The School will work closely with the parents/carers to support children who are questioning their gender and will discuss with parents/carers if clinical advice has been sought, any wider health issues and possible neurodiversity, if relevant, and consider the age of the child. Clear records of decisions will be kept. However, in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the DSL will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

Staff should never initiate a social transition request; it must always come from a child or parent. Staff must not adopt changes, e.g. in pronoun or name, unless a decision has been made with the pupil's parent and communicated with staff.

As a single-sex School, the School environment only has female toilets for pupils and all PE is single-sex. However, the School is aware that on educational visits this will not be the case. In line with the Equality Act 2010 and the Human Rights Act 1998, pupils will not be allowed to use toilets, changing rooms, or residential accommodation designated for the opposite sex.

Children requiring mental health support: All staff are aware that mental health problems can develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. These things could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. **Staff are not expected to diagnose mental health problems**, but their observations could identify those who are struggling through the following signs:

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things that they have previously enjoyed
- Physical signs of self-harm or self-neglect.

Staff with concerns in relation to a pupils' mental health must inform a DSL. If staff things that there is an immediate risk, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.

Homelessness: All staff should recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and Deputy DSL) will contact Local Housing Authorities and raise/progress concerns at the earliest opportunity should it become apparent that a family are at risk of becoming homeless. Such a referral will not replace a referral into children's social care where a child has been harmed or is at risk of harm.

In most cases, homelessness is seen in the context of children who live with their families, and any intervention by school will be on that basis. However, 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home. In a situation such as this is it recognised that a different level of intervention and support will be required via Children's services. The DSL (or Deputy DSL) will ensure appropriate referrals are made based on the child's circumstances. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and antisocial behaviour, as well as the family being asked to leave a property.

Staff should also be mindful of other specific safeguarding issues such as, drugs, gangs and youth violence, gender-based violence, teenage relationship abuse, trafficking, mental health issues, body image issues, self-harm, children missing in education etc. (Further information on these safeguarding issues can be found at What is Child Abuse? and in the Mental Health Policy).

LOOKED AFTER CHILDREN

Definition:
The term 'looked after' refers to a child who is either accommodated (whereby the local authority provides for the child on an agreed basis with the person who has parental responsibility) or is subject to a care order (whereby a court order grants shared parental responsibility to the local authority in order to protect and promote a child's welfare). Children in both instances could be living with foster carers, in a residential unit, with relatives or with parent/s on a part- or full-time basis.
A Looked After Child is considered a vulnerable child who may suffer from low self-esteem, delayed cognitive and emotional development, isolation and poor educational standards.

Aims of the care of a Looked After Child at MHSG:
All staff must:

- Know and comply with the School's procedures relating to a Looked After Child
- Have the skills, knowledge and understanding necessary to keep a Looked After Child safe
- Where appropriate, have the information they need in relation to a child's looked after and legal status to ensure that the School complies with the interim or full care order
- Contribute to the Designated Person's requests for information on educational attainment and needs, as appropriate
- Provide a supportive climate to enable a Looked After Child to achieve stability within the school setting
- Have high aspirations for the educational and personal achievement of a Looked After Child

Roles and Responsibilities:

The DSL
The DSL for the Preparatory School or the Senior School will:

- Closely monitor the progress and attendance of a Looked After Child.
- Be aware of the emotional, psychological and social effects of loss and separation from birth families and other Adverse Childhood Experiences (ACE)
- Ensure that Looked After Children are not treated differently from their peers and show sensitivity about who else knows about their LAC status
- Ensure that a Looked After Child has a PEP (Personal Educational Plan) that reflects her achievements and targets
- Keep the PEP up to date, particularly in time to inform review meetings
- Work in partnership with all professionals, parents and carers (where relevant) of a Looked After Child. This includes attending and contributing to review meetings
- Have the information needed to ensure that contact arrangements with birth parents or those with parental responsibility comply with the interim or full court order
- Have the information needed relating to the care arrangements and the levels of authority delegated to the carer by the authority looking after her
- Have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child
- Identify one member of staff who will, in compliance with the Welfare Call (LAC) Ltd, take the daily call to confirm the attendance of the Looked After Child
- Ensure confidentiality for the Looked After Child and only share personal information on a need-to-know basis
- Ensure the speedy transfer of information between individuals and other relevant agencies and to a new school if and when the child transfers
- Keep the Head Mistress and Governor (in charge of safeguarding) informed about concerns relating to a Looked After Child

The School Nurse will:

- Provide information relating to the medical care of the Looked After Child to external services as requested, particularly in preparation for review meetings
- Contribute, as appropriate, to the medical and pastoral support of the Looked After Child
- Attend review meetings

The Head Mistress will:

- Ensure that the DSL has the time and resources needed to fulfil her duties in line with the procedures relating to a Looked After Child
- Oversee the academic progress and pastoral support of a Looked After Child

The Governors will:

- Identify a nominated Governor for Looked After Children. This Governor will be the same Governor who oversees child protection and safeguarding arrangements in school
- Ensure that all Governors are fully aware of the legal requirements and guidance on the education of Looked After Children
- Be aware of whether the School has Looked After Children
- Ensure that the School's policies and procedures support the needs of a Looked After Child
- Ensure that there is a designated person appointed to monitor the academic and pastoral support of a Looked After Child
- Liaise with the Head Mistress to ensure that the DSL is able to carry out her responsibilities in relation to a Looked After Child.

Appendix 3: Specific Responsibilities

SPECIFIC RESPONSIBILITIES OF INDIVIDUALS

Governors

The duties arising from the regulations and standards fall on the governing body who must ensure that proper arrangements are in place and operating. Together with the Head Mistress and DSL, the Governors must ensure that all staff read Part One of *Keeping Children Safe in Education* and *understand* it.

The Governors will also ensure that:

- there is a whole-school approach to safeguarding, ensuring that 'safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development and that all systems, processes and policies operate with the best interests of the child at their heart.
- the School has a Safeguarding and Child Protection Policy which describes procedures, which are in accordance with current government law and guidance (currently *Keeping Children Safe in Education*, 2026 and *Working Together to Safeguard Children,* 2026*)* which refers to MSP, contributes to multi-agency working and is updated by the DSL annually.
- they review the Safeguarding and Child Protection Policy and procedures annually, receive appropriate safeguarding and child protection training (including online safety) at induction, and this should be regularly updated. This training will equip governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding
- the Safeguarding and Child Protection policy is made available to parents of students and prospective students on the School's website and from the School Office on request.
- overall strategic responsibility for the filtering and monitoring system in school including measures/ assurance that the standards are being met – including ensuring that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. In doing so, Governors should consider the number of and age range of those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
- there is a nominated governor who will liaise with the School's DSL on issues of safeguarding (not of individual students) on a termly basis and who will scrutinise the School's safeguarding practices annually to assess the efficiency with which child protection duties are discharged and take leadership responsibility for the school's safeguarding arrangements.
- the School has an explicit written recruitment and selection policy statement including safe recruitment procedures that are operated for each appointment and all appropriate checks are carried out on governors, trustees, staff and volunteers who will work with children, including DBS checks.
- the School has disciplinary procedures for dealing with allegations of abuse against members of staff, volunteers and contractors that comply with current government legislation and guidance
- the School has at least one DSL for the Senior School and one DSL for the Preparatory Scool (who will cover all sections of the Preparatory School including Early Years) who have appropriate status and authority to carry out the duties of the post
- the DSL undertake training in inter-agency working that is provided by, or to standards agreed by, the Local Safeguarding Partnership, at least annually
- the School contributes to multi-agency working in line with statutory guidance; that arrangements rest with and are published by three safeguarding partners as defined under the Children Act 2004 i.e. multiagency safeguarding team, clinical commissioning group of the area, the Police and Manchester Multiagency Safeguarding Arrangements (MMASA).
- procedures are in place to ensure that information is shared between professionals and local agencies and that this information is held in line with data protection guidance.

- the Head Mistress and all other staff / governors who work with children undertake in depth training at least every three years and receive updates at least annually to enable them to carry out their responsibilities for child protection effectively. This training must be in line with MSP procedures.
- staff have the skills, knowledge and understanding necessary to keep looked after children safe
- the School has in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, as it is recognised that this may be an indicator for a range of safeguarding risks.
- the School will hold more than one emergency contact number for each pupil.
- any deficiencies or weaknesses in child protection arrangements are remedied without delay.
- pupils are taught about safeguarding through teaching and learning opportunities.
- staff members always act in the best interests of the child.
- school procedures and policies reflect the fact that additional barriers can exist when recognising abuse and neglect in children with special educational needs.
- the DSL ensures that the child protections files are transferred to new schools as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives.
- pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum.
- they are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and local multi-agency safeguarding arrangements
- children are taught about how to keep themselves and others safe

The Head Mistress

Implementation of policies and monitoring of outcomes are the responsibility of the Head Mistress. The Head Mistress will report annually to the Governors on the working of the policy.

The Head Mistress will ensure that:

- the School has policies and procedures for handling cases of suspected abuse, including allegations against staff, supply staff, trainee teachers, volunteers and contractors which are consistent with those agreed by the MSP, are easily available to staff and volunteers for reference and are updated annually
- all policies relating to the safeguarding of children are followed and understood by all staff
- safer recruitment procedures are operated for each appointment, in accordance with current law
- all legally required checks are carried out on new governors, trustees, staff, volunteers who will work with children, including DBS checks and a single log is kept of the checks on all staff.
- the DBS (and OFSTED for EYFS) is informed about any person, whether employed, contracted, a volunteer or a student, whose services are no longer used because he or she is considered unsuitable to work with children. This information will be sent to DBS within one month of that person leaving the School. (Address: PO Box 181, Darlington, DL1 9PA Telephone: 01325 953795)

  Ceasing to use a person's services includes:

  Dismissal; non-renewal of a fixed-term contract; no longer engaging / refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation and voluntary withdrawal from supply teaching, contract working, initial teacher training or volunteering. Compromise agreements cannot apply in relation to unsuitability to work with children.
- the Teacher Regulation Agency (TRA) is informed of any misconduct referrals about teachers
- the School has designated a senior member of the leadership team for the Senior School and a second senior member of the leadership team for the Preparatory School to take lead responsibility for dealing with child protection issues, providing advice and support to other staff and working with external agencies and that sufficient resources and time are allocated for these roles; these are the Designated Safeguarding Leads (DSL)

- the School has Deputy DSLs to work with the DSL and provide cover for them in case of absence. There is a DSL mailbox to ensure that this cover is effective.
- the DSLs receive appropriate training regularly, and at least annually
- all staff know, and are alert to, signs of possible abuse and understand what to do if they have concerns or suspicions
- all staff and volunteers feel able to raise concerns about poor or unsafe practice about children
- all staff undertake training that equips them with the knowledge and skills necessary to carry out their responsibilities for child protection, in accordance with MSP procedures, and that is kept up to date by refresher training at three-yearly intervals
- parents of current and prospective students are provided with a copy of the child protection policy via the School website
- any concerns raised about poor or unsafe practice and potential failures in the School's safeguarding regime will be taken seriously

The DSL (or Deputy in case of absence)

See Appendix 4 on Page 47

The Head of the Preparatory School will also:

- take lead responsibility for safeguarding all children aged four to eleven within the Preparatory School, including Early Years, liaising with the DSL within the Senior School and the Deputy DSL and with local statutory children's agencies as appropriate
- ensure that all Preparatory staff understand the signs and symptoms of abuse, the School's procedures and channels of referral and confidentiality issues involved in child protection
- send copies of documentation relating to referrals to the DSL in the Senior School as soon as any suspicions / incidents are reported.
- ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the Preparatory School Parent Handbook.

The School Nurse and the Heads of Section are the Deputy DSLs for Child Protection in the Senior School and they are consulted by the DSLs whenever abuse is reported or suspected. The Nurse checks visible signs of physical abuse that have been reported by the child or a member of staff. The School Nurse sends copies of documentation immediately to the DSL.

The Deputy Head (Teaching and Learning) will ensure that:

- temporary and supply staff, trainee teachers and volunteers who work with students attending this School are made aware of the School's arrangements for child protection and their individual responsibilities
- the appropriate legally required child protection checks, and procedures have been undertaken for any staff employed by another organisation.
- the identity of any supply staff is checked on their arrival at the school by looking at their photographic identification

The Assistant Head will ensure that:

- the appropriate legally required child protection checks and procedures have been undertaken for any person/s working with the pupils offsite in a regulated activity (for example, Duke of Edinburgh Award expeditions)
- Child Protection / Safeguarding procedures are included on risk assessments for trips and visits

The Head's Personal Assistant or the Registrar / Assistant Registrar will ensure, for any child of compulsory school age, that she

- receives, from parents of students from overseas, details of the arrangements they have made for their daughter's care
- forwards information to local multi-agency safeguarding team, if required to do so, when a child has a Tier 4 visa

- lets the Deputy Head (Pastoral) know when a parent gives notice
- lets the Deputy Head (Pastoral) know the date of leaving the school roll and the destination school, if known
- informs the child's local authority of the destination school or a parent's intention to home educate their daughter
- informs local multi-agency safeguarding team if a child is due to start school here and does not turn up
- informs the child's local authority if a girl must leave for non-payment of fees
- informs the child's local authority if a child has been certified as medically unfit to attend school
- informs the child's local authority if a child is in custody for more than four months
- informs the child's local authority if a child has been permanently excluded
- checks, if parents have said that they are moving abroad, with the school to which they are moving

All staff, volunteers and governors will ensure that they

- Know the names of the DSLs and Deputy DSLs for child protection in the school
- Read the safeguarding and child protection section of the Staff Handbook each September, when they begin their contract at the school and when the policy has been reviewed
- Know and implement the School's policy and procedures on safeguarding and child protection
- Are alert to the signs of harm and abuse in students of the school
- Report concerns immediately to the DSL or a Deputy DSLs
- Take into account the School's Equal Opportunities Policy when discharging their duties
- Attend induction meetings on child protection
- Attend training on child protection
- Understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Provide the Deputy DSLs with a list of pupils involved when organising residential educational visits, in order to ensure that they are made aware of all essential information relating to the pupils in their care.

Appendix 4: Role of the DSL

ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL) (and Deputy DSL in their absence)

The DSL has lead responsibility for safeguarding and child protection including on-line safety.

Referrals and follow up

- Refer concerns about a child's welfare, possible abuse or neglect to local multi-agency safeguarding team Children's Social Services as soon as is reasonably practical (within 24 hours).
- Refer cases of suspected abuse or allegations to the relevant investigating agencies promptly, including the Police if a criminal matter and local multi-agency safeguarding team as required
- When working with others, liaise with the Head Mistress to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an appropriate adult, under PACE Code C.
- Be responsible for ensuring that the filtering and monitoring standards of the school are met. Ensure that filtering and monitoring provision are reviewed, (which can be part of a wider online safety review), at least annually.
- Refer cases to the Channel programme where there is a radicalisation concern
- Refer cases where a person is dismissed or left due to risk / harm to a child to the Disclosure and Barring Service
- Refer any serious cases to the Charities Commission
- Act as a source of support, advice and expertise within the School including when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with the Head Mistress to inform her of any issues and ongoing investigations and ensure there is always cover for this role.
- As required, liaise with the lead practitioner at the local multi-agency safeguarding arrangements for child protection concerns and attend strategy discussions, child protection conferences and family group meetings as required in order to assess the needs of a child and provide on-going support. Contribute to the Early and Family Help assessment processes and provide a report to be shared with parents.
- Support staff in providing a child with early help assessment.
- Support staff who make referrals to local authority children's social care or to the Channel programme
- Be available to discuss any safeguarding concern with members of staff and ensure that if the DSL is absent, a deputy is available.
- Ensure that any absence from School of a pupil currently on the Child Protection Register of two days, without satisfactory explanation, is referred to their Education Welfare Officer and/or Social Worker.
- In all cases the DSL has access to external advice and appropriate legal service.

Training

- Receive training in safeguarding procedures regularly but at least annually and undertake Prevent awareness training
- Understand the additional risks faced by SEND, LGBT children and those with a social worker and/or are already being supported by the Pastoral Team. SEND code of practice:0 to 25 years
- Understand the unique risks associated with online safety and the applicable roles and responsibilities in relation to filtering and monitoring.
- Recognise how to identify signs of abuse and when it is appropriate to make a referral.
- Have a working knowledge of how Local multi-agency safeguarding arrangements operate and the conduct of a child protection case conference, particularly that of MSP as outlined in Manchester's Multi-Agency Safeguarding Arrangements (MMASA)

- Maintain effective links with MSP to ensure procedures are updated as appropriate, in line with Working Together to Safeguard Children.
- Understand the assessment process for providing early and family help assessment and intervention, for example through locally agreed common and shared assessment processes such as early help assessments and family help assessments
- Ensure each member of staff has access to, and understands the school's child protection policy and the procedural stages that involve them, especially new or part-time staff who may work with different educational establishments
- Ensure all staff have induction training, in depth training at least every three years and update training at least annually and are able to recognise and report any concerns immediately they arise
- Keep detailed, accurate, written records of referrals and/or concerns securely and separately from other records
- Obtain access to resources and to attend any relevant or refresher training courses at least annually
- Liaise with the Deputy Head (Teaching and Learning) to ensure that other DSLs have training regularly and, at least annually
- Be alert to the specific needs of children in need, those with special educational needs and young carers

Raising awareness

- Ensure the School's child protection policies are known, understood and used appropriately
- Ensure that students are given information on who to turn to if they are a victim of neglect or abuse.
- Ensure the establishment's Safeguarding and Child Protection policy is updated and reviewed annually and sooner if new legislation is introduced, and work with the governing body, senior leadership team and Head Mistress regarding this
- Keep staff aware of child protection procedures within school
- Report to Governors each term.
- Ensure parents have access to the Safeguarding and Child Protection policy on the School's website which alerts them to the fact that referrals may be made and the subsequent role of the School in this procedure
- Where a child leaves the establishment, share relevant child protection information with the new establishment as soon as possible and transfer it separately from the main pupil file and obtain a confirmation of receipt, preferably hand delivering it to the designated person.
- Having received information regarding safeguarding or the learning support need of a child, the DSL will share this information with key staff as required and promote these outcomes.

Appendix 5: Managing Allegations against Adults

MANAGING ALLEGATIONS OF ABUSE MADE AGAINST ADULTS WHO WORK WITH CHILDREN AND YOUNG PEOPLE

Part 4 of KCSIE 2026 should be consulted alongside this policy and the School's staff code of conduct / Whistle Blowing procedures, which are separate to this policy).

Introduction
This policy has been written in line with government guidance from the following documents:

Keeping Children Safe in Education (September 2026)
Education (Independent School Standards) Regulations (2014)
Teacher misconduct: referring a case (2014)

The term statutory guidance means that the School must have regard to it when carrying out duties relating to handling allegations of abuse against teachers and other staff.

This policy applies to all adults who work with children and young people in Manchester High School for Girls, whether paid employees or volunteers and looks to the procedures followed Manchester's Safeguarding Children Partnership for guidance on managing allegations of abuse against adults who work with children.

The procedures outlined in this policy will be followed when an allegation is made that an adult has:
1. Met the harms threshold
2. Not met the harms threshold – referred to as 'low level concerns'.

1. Allegations that may meet the harms threshold

This guidance should be followed when it is alleged that anyone working in the School has:
(i) behaved in a way that has harmed, or may have harmed a child;
(ii) possibly committed a criminal offence against a child, or related to a child; or
(iii) behaved towards a child or children in a way which indicates that s/he would pose a risk of harm if s/he works regularly or closely with children
(iv) behaved or may have behaved in a way that indicates they may not be suitable to work with children

Harm is considered in its widest context and may include: sexual harm, physical harm, financial harm, neglect, emotional harm, psychological harm or verbal harm. As outlined on the Disclosure and Barring service website on Gov.Uk, the harm test assesses if an adult, has behaved in a way that has harmed a child, or may have harmed a child, possible committed a criminal offence against or related to a child or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

An **adult** is defined in this policy as a permanent or temporary member of the school staff, employment agency supply staff, trainee teacher, volunteer, self-employed person and staff employed by a contractor or services provider.

According to this definition, an adult may not necessarily be 18 years of age or over.

All adults working in Manchester High School for Girls are expected to comply with the School's Code of Conduct to ensure safe working practice.

Underlying principles

- The welfare of the child is paramount. GDPR will not be allowed to stand in the way of safeguarding children. See data protection: toolkit for schools
- It is the responsibility of all adults in this School to safeguard and promote the welfare of children and young people and to support a child who has allegedly been harmed by an adult.
- The School also has a duty of care for those adults employed, commissioned or contracted to work with children and young people in the School.
- Adults about whom there are allegations of abuse will be treated fairly, consistently and quickly, in line with employment law, and will be provided with support, including a named contact if he / she is suspended.
- Quick resolution of an allegation is to the benefit of all involved and will be given priority.
- The School will not undertake its own investigation of allegations without prior consultation with the Designated Officer, or in the most serious cases, the police, so as not to jeopardise investigations.
- Allegations against a teacher who is no longer teaching at the School will be referred to the Police.
- The School has a staff code of conduct (separate to this policy) which provides clear guidance about behaviour and actions so as not to place pupils or staff at risk of harm or of allegations of harm to a student.
- Any investigations into allegations against staff should be reflected upon so that lessons can be learned; whether the allegations are substantiated or not.

Timescales

(i) It is expected by the DfE that, where it is clear immediately that the allegation is unfounded, it will be resolved within one week.
(ii) If the initial evaluation finds that the allegation does not involve a criminal offence or child protection concerns, and there is no requirement for formal disciplinary action, the Nominated Senior Manager should institute appropriate action within three working days.
(iii) If a disciplinary hearing is required, and can be held without further investigation, the hearing should be held within fifteen working days (see the later section on Disciplinary Hearings).
(iv) If the Designated Officer needs to be contacted, then this should take place within one working day of all allegations that come to our attention.

Definitions

The following definitions are used when determining the outcome of allegation investigations:

Substantiated:	there is sufficient evidence to prove the allegation
Malicious:	there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
Unsubstantiated:	there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
Unfounded:	to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Strands in the consideration of an allegation
The order of action will depend on the nature and seriousness of the allegation and will not necessarily follow the order below.

1. Support to the child or young person, with immediate treatment if the child is injured
2. Provision of information to the parents of the child
3. Consultation with the Manchester Designated Officer (LADO) which may lead to:
    - Referral to the Police in the case of a possible criminal offence
    - Consultation with Children's Social Care Services if the child is in need of protection or other services
    - Internal action and consideration by the School of whether disciplinary action is warranted
4. Provision of information to the person against whom the abuse is alleged

Nominated Senior Manager within the School

- The Nominated Senior Manager within the School, that is, the person who undertakes the internal investigation and liaises with the Designated Officer, Police and Children's Social Care Services as appropriate, is the Head Mistress. She may delegate the investigation to the DSL.
- In the event of the absence of the Head Mistress, the Nominated Senior Manager will be the DSL
- In the event of allegations of abuse against the Head Mistress, the Nominated Senior Manager within the School will be the Chair of Governors who will be contacted by the Senior Designated Person for Child Protection (DSL).

PROCEDURES TO BE FOLLOWED Initial reporting of an allegation
A person receiving an allegation of abuse should report the matter immediately to the Nominated Senior Manager (the Head Mistress or, in the absence of the Head Mistress, the DSL). The Nominated Senior Manager will record facts provided by this person, such as the nature of the allegation, times, dates, locations and the names of any potential witnesses.

If allegations of abuse are made about the Head Mistress, the matter should be reported to the DSL who will immediately inform the Chair of Governors and the Designated Officer. The Head Mistress will not be informed at this stage.

Designated Officer for Manchester: 0161 234 1214
Website: Allegations against Professionals (LADO) - Manchester Safeguarding Partnership

If the allegation meets any of the criteria (i), (ii) or (iii) outlined in the introduction of this policy and requires immediate intervention by the Designated Officer and/or the police, the Nominated Senior Manager will contact the Designated Officer. In the most serious cases, the Police will also be informed. The Designated Officer will be informed as soon as possible of allegations that meet the threshold for referral, and they will guide the Nominated Senior Manager as to the actions they must take. (See procedures below.)

Confidentiality
All employees of the School will:
(i) make every effort to maintain complete confidentiality and avoid discussing the situation within or outside school, except when interviewed as part of the official investigation
(ii) guard against publicity / media interest during an investigation. No material should be published that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil. This includes on social media. Such restrictions apply until the point that an accused person is charged with an offence, until the Secretary of State publishes information relating to the case or until the individual goes public or gives written consent for another to do so.

The Nominated Senior Manager will agree with the Designated Officer, Police (if necessary) and Children's Social Care Services the following:

- What information can be shared and with whom
- What, if any, information can be given to the wider community to reduce speculation
- How to manage speculation, leaks and gossip
- How to manage press interest, if it should arise

The Police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the Police might depart from that rule, the School should expect to be consulted beforehand.

Recording

The person receiving the initial allegation of abuse will produce a written, signed and dated account of the allegations, as soon as possible. This will be hand-delivered to the Nominated Senior Manager who will read, sign and date it. Communication with the individual and the parents of the child / children will be agreed.

Comprehensive minutes will be produced of all meetings, preferably by a person not involved in the investigation.

The Nominated Senior Manager will keep records of all documents submitted, and, for all allegations – other than those found to have been malicious and false – the following information will be kept on the file of the person accused:

- A clear and comprehensive summary of the allegation
- Details to how the allegation was followed up and resolved
- A note of any action taken, and decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded
- A copy provided to the person concerns, where agreed by children's social care or the Police
- A declaration on whether the information will be referred to in any future reference (substantiated allegations should be included in references, provided that the information is factual and does not include opinions)

Records concerning allegations of abuse must be preserved for the term of the Independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer. This applies even if the individual leaves the organisation.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide information where future DBS disclosures reveal information from the police about an allegation that did not result in a criminal conviction.

Allegations that are not substantiated are unfounded or malicious will not be referred to in references, even if there is a history of repeated concerns or allegations which have been found to be unsubstantiated or malicious.

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

ACTION BY THE NOMINATED SENIOR MANAGER Initial evaluation
The Nominated Senior Manager will make a decision on whether it is necessary to contact the Designated Officer on **0161 234 1214** for advice.

The Designated Officer should be consulted if there is any doubt as to whether the allegation meets the criteria set out in this policy.

The purpose of an initial discussion with the Designated Officer is for the Designated Officer and the Nominated Senior Manager to consider the nature, content and context of the allegation and agree a course of action.

The Designated Officer may ask the Nominated Senior Manager to provide or obtain any additional information which may be relevant, such as previous history, whether the child/family have made similar allegations and the individual's current contact with children.

The discussion will include deciding whether the information meets agreed thresholds to hold a **strategy meeting** under child protection procedures and whether the police and/or Children's Social Care Services need to be involved.

Discussions will be recorded in writing and any communication with both the individual and the parents of the child / children agreed.

The following two aspects will be considered when an allegation is made:

- Looking after the welfare of the child
- Investigating and supporting the person subject to the allegation

Procedure if no further action involving external agencies is required

This initial sharing and evaluation of information may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. This assumes that no strategy discussion is needed and no involvement of police or Children's Social Care Services is required.

- In this case, the decision and a justification for the decision will be recorded in writing by the Nominated Senior Manager and the Designated Officer.
- The Nominated Senior Manager and the Designated Officer will agree what information should be put in writing to the individual concerned and by whom.
- The Nominated Senior Manager will inform the accused person about the allegation as soon as possible after consulting the Designated Officer and will give as much information as possible at the time.

The Nominated Senior Manager and the Designated Officer will consider what action should follow in respect of:

1. the individual who is the subject of the allegation / concern
2. the person(s) who made the initial allegation

The investigation must be concluded even if the individual facing the allegation resigns or stops providing their services.

If the decision is made that an allegation has been deliberately invented or malicious, the Head Mistress will make a decision about disciplinary action against the person making the allegation. The Head Mistress may ask the police whether any action might be appropriate with respect to the Protection from Harassment Act 1997.

Procedure if further action involving external agencies may be required

If there is cause to suspect that a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened by the Designated Officer.

In this case, the Nominated Senior Manager will not provide information to the accused person until the appropriate external agencies have been consulted and have agreed what information can be disclosed to the person.

The Designated Officer will canvass the views of police and/or children's services as to whether the member of staff should be suspended from contact with children. The power to suspend rests with the Nominated Senior Manager alone and it cannot be required by another agency, although the Nominated Senior Manager will have regard to the views of investigative agencies if involved. (See section on Suspension). An individual should only be suspended if there is no reasonable alternative.

If the strategy discussion decides that an investigation by police or Children's Social Care Services is not necessary, the Designated Officer and Nominated Senior Manager will discuss next steps. This may include:

- No further action
- Summary dismissal
- A decision not to use the person's services in future
- Further enquiries by a senior manager of the School or an investigator independent of the School
- Report to the DBS
- Referral to the Teaching Regulation Agency

Resignations and compromise agreements

The School will follow the procedures outlined above, including referring the individual to the DBS, even if a person against whom an allegation has been made tenders their resignation or withdraws the provision of a service. The findings will be recorded.

The School will not make a compromise agreement in the case of allegations of abuse or when the criterion are met to make a DBS referral. A compromise agreement will also not be made in cases of refusal to cooperate or resignation before the member of staff's notice period expires.

Support to the person against whom the allegation is made

The School will make every effort to manage and minimise the stress arising from the allegations and ensuing processes.

An individual will be informed of an allegation as soon as possible and the likely course of action explained, unless there is an objection from the Designated Officer, Children's Social Care Services or the police.

Any member of staff subject to an allegation will be offered support throughout the process. They will be encouraged to seek advice and support at the earliest opportunity from a professional association or trade union if they are a member, or from a colleague. Wherever possible, the member of staff will be given a full opportunity to answer the allegation and make representations about it.

The member of staff, or their representative, will be given the name of a named representative who will then keep them up to date regarding the progress of the case and consider what other support is appropriate. This named representative would normally be the Deputy Head (Teaching and Learning) who is in charge of staff.

Social contact with colleagues will not be prevented unless there is evidence to suggest that such contact is likely to prejudice the collection of evidence.

The need for help and support is equally applicable when considering a suspended person's return to work. A phased return and the provision of a mentor to provide assistance and support in the short term will be provided, if appropriate.

Support to the child or children involved and their parents
If the child has suffered injury, the School Nurse will provide emergency assistance if required. The DSL will accompany the child to hospital to ensure professional assessment and immediate treatment of the injury. In this case, parents will be informed immediately. There will be no communication about the alleged abuse with the child who is the subject of the allegation. Parents will be informed about the allegation as soon as possible unless a strategy discussion is required or Police and/or Children's Social Care are involved. In this case, there will be discussion and agreement on what can be disclosed.

Unless there is a criminal prosecution, parents will be informed about the progress of a case (though not any details of a disciplinary hearing) and the outcome, in confidence.

Parents will also be informed of the prohibition on reporting or publishing allegations against teachers in section 141F of the Education Act 2002.

Disciplinary hearings
If the Nominated Senior Manager, in consultation with the Designated Officer, feels that an internal disciplinary investigation and/or hearing is needed, she will comply with the School's disciplinary policy in terms of the timescales for the investigation.

- If a disciplinary hearing is required and can be held without further investigation, the hearing will be held **within 15 working days**.
- Where further investigation is required to inform consideration of disciplinary action, the Nominated Senior Manager will discuss who will undertake that investigation with the Designated Officer. In some circumstances, it may be appropriate for the disciplinary investigation to be conducted by a person who is independent of the School or the person's line management, to ensure objectivity.

The investigating officer should aim to provide a report to the Nominated Senior Manager **within 10 working days**.

- On receipt of the report of the disciplinary investigation, the Nominated Senior Manager should decide within two working days whether a disciplinary hearing is needed.
- If a disciplinary hearing is needed, it must then be held within 15 working days of the decision.

The Nominated Senior Manager will continue to liaise with the Designated Officer, who should monitor progress of the case and provide advice/support when required or requested.

Case subject to police investigation: Information for the Nominated Senior Manager
If a criminal investigation is required, the police will aim to complete their enquiries as quickly as possible, consistent with a fair and thorough investigation, and will keep the progress of the case under review.

The police should, at the outset, set a target date for reviewing progress of the investigation and consulting the Crime Prosecution Service (CPS) about whether to proceed with the investigation, charge the individual with an offence, or close the case. Wherever possible, that review should take place **no later than four weeks** after the initial evaluation meeting.

If the decision is to continue to investigate the allegation, dates for subsequent reviews at fortnightly or monthly intervals should be set at that point. (It is open to the police to consult the CPS about the evidence that will need to be obtained in order to charge a person with an offence at any stage.)

If the police and/or CPS decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a court, the police should pass all information they have which may be relevant to a disciplinary case to the Nominated Senior Manager without delay.

If the person is convicted of an offence, the police should also inform the Nominated Senior Manager straightaway so that appropriate action can be taken.

Suspension

Suspension will be considered by the Nominated Senior Manager in discussion with the Designated Officer in any case where there is cause to suspect that:

(i) a child is at risk of significant harm, or
(ii) the allegation warrants investigation by the police, or
(iii) the allegation is so serious that it might be considered grounds for dismissal.

DfE guidance states that a person must not be suspended automatically or without careful thought and that the Nominated Senior Manager must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children until the allegation or concern is resolved. An individual should be suspended only if there is no reasonable alternative and, when it is deemed appropriate to suspend, written confirmation should be given within one working day. This written confirmation should give as much detail as appropriate for the reasons for the suspension. The individual should also be provided with a named contact within school who will provide support and information as appropriate.

Alternatives to suspension for staff employed by the school

- the individual could undertake duties which do not involve direct contact with the child concerned or other children, for example administrative work
- an assistant or colleague could be present when the employee has contact with children
- the child / children involved could be moved to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted.

It may be appropriate to use an alternative to suspension when an allegation is first made. This would allow time for an informed decision regarding suspension to be made and possibly reduce the initial impact of the allegation. This will depend upon the nature/ seriousness of the allegation.

An interview to consider suspension

Where suspension is being considered, an interview with the member of staff will be arranged. Where police are involved in a criminal investigation, this interview will not be conducted without prior consultation with the police officer in charge of the case.

The member of staff will be advised to seek the advice and assistance of their trade union, or a friend if they are not a member, and offered the opportunity of a brief meeting with the representative or friend before the interview.

The member of staff will be given as much information, including the reasons for any proposed suspension, as is consistent with not interfering with an investigation about the allegation. If it is

considered that suspension is necessary, the individual will be advised that they are suspended from duty. Written confirmation will be dispatched **within one working day**, giving the reasons for the suspension.

Action on conclusion of a case

If the allegation is substantiated and the person (whether employed, contracted, a volunteer or student) is dismissed or the School has ceased to use the person's services, the Nominated Senior Manager will make a prompt referral to the DBS. It is a statutory duty to report the person to the DBS if the School believes that the person has met the criteria outlined by the DBS and engaged in conduct that harmed or is likely to harm a child. This will be done immediately. This will apply even if the person resigns or withdraws their voluntary services before a disciplinary process has been completed. 'Compromise agreements' will not be used to prevent a referral being made to the DBS when it is legally required nor will an individual's refusal to cooperate with an investigation. The Nominated Senior Manager will respond to requests from the DBS for information and reports will include as much evidence as possible about the circumstances of the case.

A referral to the Teaching Regulations Agency (TRA) may also be made where a teacher has been dismissed (or would have been dismissed had they not resigned). In such cases, a prohibition order may be appropriate when there is evidence of unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence.

If the allegations were unsubstantiated or malicious and the member of staff was suspended as a result of the allegation, appropriate support should be offered so that he/she can return to school. A phased return may be considered in this situation. In these situations, the Designated Officer may also decide to refer
the child / children concerned to external agencies. The Head Mistress will also decide whether any disciplinary action is appropriate against the student who made the allegation.

The Head Mistress will review whether any improvements to the School's procedures would help to prevent similar events in the future. This will also include issues arising from suspension of a member of staff.

2. Low-Level Concerns - Concerns that do not meet the harm threshold

MHSG promotes an open and transparent culture in which all concerns about all adults working in or behalf of the School are dealt with promptly and appropriately. All staff should share low-level concerns with the DSL in the knowledge that their concerns will be addressed and dealt with proportionately and sensitively. The purpose of the Low-Level Concern policy is to create and embed a culture of openness, trust and transparency in which our values and expected behaviour (as set out in the staff code of conduct) are constantly lived, monitored and reinforced by all staff.

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the threshold set out above and / or may have acted in a way that:
is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Those behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. These include, for example:

(i) being over friendly with children

(ii) having favourites
(iii) taking photographs of children on their mobile phone
(iv) engaging with children on a one-to-one basis in a secluded area or behind a closed door
(v) using inappropriate sexualised, intimidating or offensive language
(vi) sending emails or Teams messages to a child that are excessive in number, outside of usual working hours and/or not related to school matters

All low-level concerns should be recorded in writing and confidentially, so as to comply with the Data Protection Act 2018 and the UK General Data Protection Regulation. These records will be reviewed to identify potential patterns of concerning, problematic or inappropriate behaviour. If school are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the LADO will be consulted.

Low-level concerns which are shared about supply staff, trainee teachers and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Low-level concerns should not be included in a reference; only when it has met the threshold for referral to the Local Safeguarding Lead and found to be substantiated, should it be referred to in a reference.

Responding to Low-Level Concerns:
Procedure: All low-level concerns should be reported to the **Head Mistress** who may **delegate an investigation to the DSL if required**. If it is required, information collected will help to categorise the type of behaviour, as well as to determine what further action may need to be taken. This will be recorded along with the rationale for decisions and action taken. Not all low-level concerns will require an investigation; they will need to be recorded. See Disciplinary Policy for further detail on the procedures for such an investigation.

The following records should be kept about low-level concerns:
(i) details of the concern
(ii) the context in which it arose
(iii) evidence collected by the DSL where the concern was raised by a third party
(iv) the decision categorising the type of behaviour
(v) action taken
(vi) the rationale for decisions and action taken
(vii) the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)

SAFER RECRUITMENT PROCESSES

The School operates safer recruitment procedures and complies with government regulations. These are outlined more fully in the School's Employment Policy and are vital to help deter, reject or identify people who might abuse children.

The procedures stated below also refer to workers not on the payroll, for example staff employed by contractors and unpaid volunteers. Peripatetic staff and sports coaches are also included.

The School complies with current requirements relating to safer recruitment. The Disclosure and Barring Service (DBS) was launched on 1st December 2012 and merges the services previously provided by the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA). The DBS assesses every person who wants to work or volunteer with children or vulnerable adults in order to prevent anyone who is unsuitable from working with children from being able to do so. The level of DBS certificate required will depend on the role being offered and duties involved. This will establish whether a check for prohibition, direction, sanction or restriction is required.

In enhanced checks, the DBS monitors the applications it receives against the Police National Computer, local records kept by the Police, information provided under Section 142 of the Education Act 2002 (formerly List 99) and the Children's Barred List. It then assesses this information and decides whether to give the individual concerned DBS registration or put him/her on the DBS barred list.

The School is under a legal duty to notify the DBS of relevant information, so that individuals who pose a threat to vulnerable groups can be identified and barred from working with these groups in future. If the School dismisses or removes any person from working with children in a regulated activity, the Head Mistress will inform the DBS. The DBS contact details for referrals are 01325 953795. The DBS referral form must be filled in and sent to DBS, PO Box 181, Darlington DL1 9FA.

The Crime and Policing Act 2026 made changes to regulated activity, meaning that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight is now in regulated activity. This change removed the supervision exemption and therefore requires further checks for volunteers, even if they are supervised.

Regulated activity includes:

a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children.

Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight. Some activities are always regulated activities, regardless of frequency. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;

- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

• paid work in specified places which is occasional and temporary and does not involve any of the activities in (a) above.

Most staff in a school and those in colleges working with children will be engaging in regulated activity relating to children, in which case an enhanced DBS check which includes children's barred list information, will be required.

For all other staff (e.g. contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate. Barred list information must not be requested on any person who is not engaging in or seeking to engage in regulated activity.

Recruitment procedures

For all staff and volunteers appointed to work in regulated activity, **the School will:**

Before the interview

- Ensure that all job descriptions, including Form Tutor job description, make reference to the responsibility for safeguarding and promoting the welfare of children
- Ensure that the person specification includes specific reference to suitability to work with children
- Use an application form to obtain a detailed common set of data from all applicants, including verification of professional status such as DfE reference number, QTS, GTC registration, NPQH. The Teacher Services' system will be used to verify awards of QTS.
- Ensure that the application form includes a statement to the applicant that any previous employers may be approached for information.
- The application form also makes it clear that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.
- The application pack states clearly that the School's Child Protection and Safeguarding Policy and the Employment Policy are available on the School website.
- Applicants will be expected to provide personal details, current and former names, current address and national insurance number, details of their present (or last) employment and reason for leaving; full employment history (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment; qualifications, the awarding body and date of award; details of referees and a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.
- Check that a candidate for a teaching post has completed the statutory induction period satisfactorily. (School will use the government 'Check a teacher's record' service to make GTCE, prohibition, direction, restriction, and children's barred list checks: Check a teacher's record.
- Obtain and scrutinise comprehensive information from applicants, checking for discrepancies, anomalies, any unexplained gaps in employment or any frequent changes in employment if not for promotion.
- Approach referees before an interview in the effort to obtain two independent, professional and character references that answer specific questions to help assess an applicant's suitability to work with children. One referee will be the applicant's current or more recent employer. References will not be accepted from relatives or from people writing solely in the capacity of a friend. If the referee is school based, the reference should be confirmed by the Head as accurate in respect to disciplinary investigations. Testimonials and open references will not be accepted. These references will be verified to ensure that they are genuine.

- Check previous employment history and reasons for leaving.
- We will carry out a search (via and online search engine) as part of our due diligence on the shortlisted candidates, to help identify any incidents or issues that have happened, and are publicly available online, which School might want to explore with the applicant at interview. The candidates will be informed of this.
- For short-listed candidates, if a candidate claims to have specific qualifications or experience that is relevant to the post and this might not be verified by a reference, it is good practice to verify the facts before interview by telephoning previous employers and asking for written confirmation of the facts, so that any discrepancy can be explained at interview.
- Carry out further checks on those who have lived overseas if a DBS enhanced disclosure check is insufficient to establish suitability to work in a school. Obtain a certificate of good conduct from an embassy or police force. In addition, obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which they have worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.
- Where an individual working within the school, moves from a post that was not a regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity will be carried out
- Where an individual moves from a position that did not involve the provision of education to one that does, it will be treated as if that individual were a new member of staff and all required pre appointment checks will be carried out.
- Shortlisted candidates should be asked to complete a self-declaration of their criminal record of information that would make them unsuitable to work with children. They should also sign a declaration confirming the information they have provided is true. Where they have provided an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

Interview procedures

- Ensure that one member of the interview panel has undertaken Safer Recruitment training
- Conduct a face-to-face interview that includes assessment of the applicant's suitability to work with children. Keep a written record of the outcome. Question any unexplained gaps in employment, discrepancies or anomalies. Keep a written record of reasons given for gaps
- Check the applicant's identity and right to work in the UK, keeping a photocopy in the personnel file
- Verify that the successful applicant has any academic or vocational qualifications claimed. Photocopy relevant certificates and store these in the successful appointee's personnel file

After interview and provisional appointment

- Verify that the successful candidate has the mental and physical capacity for the post.
- Apply to the DBS for an enhanced DBS check and keep records. This also applies to any foreign nationals. MHSG will not be accessing the Update Service to carry out Status checks on an individual's DBS Certificate. The School will apply for a new DBS check with each appointment.
- In the unlikely event that an enhanced DBS disclosure has not been obtained before an individual is due to start work, a risk assessment will be completed by the Line Manager and checked by the Deputy Head (Teaching and Learning) and the Director of Finance and Operations. The individual will be supervised whilst children are on the school site.
- Keep a single central register (SCR) of pre-appointment checks made in respect of their staff, all others who work in regular contact with children in the school and all members of the Governing body. Include (for all except the Governing Body):
  Identity of appointee

Name (passport or other official document with a photograph), address (utility bill or financial statement). Best practice is checking the name and date of birth on their birth certificate, where this is available. The name of the checker and the date checked should be recorded.

Recommended

Post and date of appointment

Qualifications checks

Educational and professional qualifications required; name of checker and date

Suitability to work with children

DBS enhanced check, DBS standard check; DBS (unique reference number); name of checker and date Self-declaration relating to disqualification

Other statutory checks

Right to work in the UK check; name of checker and date

Overseas check –

Following Brexit, the TRA Teacher Services system no longer maintains a list of those teachers who have been sanctioned in EEA member states, so should apply the same approach for any individuals who have lived or worked outside the UK (for three months or more) regardless of whether or not it was in an EEA country or the rest of the world. This standard applies where relevant both to foreign nationals and UK nationals returning from overseas. In the absence of a response from official sources overseas before the person starts work, or if the country in question does not have a suitable system in place, we should seek alternative methods of checking suitability and undertake a risk assessment to inform the decision on whether to appoint.

Prohibition from teaching under section 141B / TRA

Prohibition from teaching under section 141B

Subject to disciplinary sanctions imposed by the GTCE prior to 2012

Prohibition from management

Check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, called a section 128. To ensure that a teacher is not subject to a prohibition order, information provided by the TRA is checked via the website https://www.gov.uk/teacher-status-checksinformation-foremployers.

References received; name of checker and date. Reference to be requested directly from the referee; and will be current employer or most recent employer if not currently employed.

A referee should be a senior person with authority and not just a colleague. Referees will be checked to ensure that they originate from a legitimate source. Application form; name of checker and date

Medical fitness declaration; name of checker and date

All documentation will be photocopied by the P.A. to the Head Mistress and stored in the individual staff record folder in a locked cabinet.

- Supply information to the DBS and TRA where the School has stopped using the services of a person because they consider her / him unsuitable to work with children, whether this person has been dismissed or resigned, or where false information has been provided in an application for a post in the School.
- Ensure that no one is employed who has been barred by the DBS as this is a criminal offence.
- Provide each successful candidate with copies of the Child Protection and Safeguarding policy, Part One of Keeping Children Safe in Education, the Staff Code of Conduct, the Behaviour Policy and Whistleblowing Policy.

Recruitment of supply staff

The School will:

- Ensure that it has received written notification from any supply agencies used that the relevant DBS disclosure has been received and whether the DBS certificate included any disclosed information
- Ensure that it has received a copy of the DBS certificate if there was any disclosed information or any information provided to the agency alongside the certificate

- Ensure that the individual arriving at the school is the individual the agency is intending to supply, for example by seeing the passport and checking the photograph.
- Not cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. School will liaise with the agency to establish whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

In considering the need for a DBS, School must consider the nature of the work with the children, knowledge of the volunteer, whether a reference would be possible and whether the role is eligible for an enhanced DBS check. A record must be kept that this risk assessment took place. Assurances will be sought from the employers of contractors working on the site that they have been subject to the appropriate level of DBS check.
For anyone working in the School who is not in regulated activity, an enhanced DBS check without a barred list check will be requested. All such volunteers / visitors will not be left unsupervised and will be accompanied by an existing member of staff at all times. This supervision must be by a person in regulated activity, each time they are in the school and that it must be 'reasonable in all the circumstances to ensure the protection of children'.

For other adults who supervise our students, for example on work experience, procedures are in place to protect children from harm. This includes, if regulated activity is taking place, asking the employers to ensure that the person providing instruction / training is not a barred person.

The Governing Body will ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

Copies of DBS certificates and records of criminal information disclosed by candidates are covered by UK GDPR/DPA 2018 Article 10. To ensure that School complies with the requirements of the Data Protection Act 2018, when copies are retained, there will be a valid reason for doing so and they will not be kept for longer than six months. When this information is destroyed a record will be kept of the fact that vetting was carried out and the result and the recruitment decision. It is understood that School does not have to keep copies of DBS certificates, in order to fulfil the duty of maintaining the single central record.

Appendix 7: Log of concern about a child's welfare (for non-CPOMS users)

Log of concern about a child's welfare Please refer to the MHSG Child Protection and Safeguarding Policy for detailed guidance.

Name of child:		Form:
Today's date:		
Name and role of person completing the log:		
Date and time of the incident /concern/disclosure:		
Situation/location of disclosure		
Description of the incident / concern – include any record of conversation with the child – please try to use the exact words		
Signature of person completing log:		
Please pass this form immediately to the Designated Safeguarding Lead		