



# MERCHANT TAYLORS'

## Prep

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### **SAFEGUARDING & CHILD PROTECTION POLICY**

**Policy Custodian:** *Deputy Head*

**Approving Governors Committee:** *Full Governing Body*

**Approved by Governing Body:** *November 2023*

**Amended:** *September 2024*

**Next Review:** *November 2025*

#### **Introduction and Key Principles**

Merchant Taylors' Prep takes a child-centred, whole-School approach to safeguarding and child protection. This means that all members of staff are responsible for the safeguarding and welfare of children with whom they come into contact, and they should consider at all times what is in the best interests of the child.

All members of staff have a responsibility for the implementation of this policy. All staff should be prepared to identify children who may benefit from early help. All staff should be aware that children may not be ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experience as harmful. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns.

All staff must have read and understood, and act in accordance with, Part One of [Keeping Children Safe in Education \(DfE, September 2024\)](#). All staff must also have read this policy and the Staff Code of Conduct.

All staff must know who the Designated Safeguarding Lead (DSL) and Deputy DSLs are and all concerns regarding safeguarding and/or child protection must be reported immediately to the DSL or a Deputy DSL.

All concerns regarding safeguarding and/or child protection should be reported immediately via CPOMS. If the member of staff is unable to access CPOMS for any reason, this should not delay them in making a report and they should instead speak to the DSL or a member of the Safeguarding Team directly. Staff are also able to complete and deliver a Record of Concern Form (Appendix 2) to one of the DSLs' Office, if for any reason they are not able to make a report using CPOMS or in person. Staff should challenge any perceived inaction and follow this up with the DSL.

If a child is in immediate danger, a referral should be made to Children's Services and/or the police immediately.

If a crime has been committed, or there is reason to suspect it will be committed, it should be reported to the police.

This policy applies to all pupils in the School.

The School's Local Safeguarding Partnership is [Hertfordshire](#) and the three partners are Hertfordshire County Council, Hertfordshire Constabulary and Herts Valley CCG.

## Legislation and Guidance

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004, the procedures laid down by the [Hertfordshire Safeguarding Children Partnership \(HSCP\) Procedures](#), and with due regard to the following legislation and guidance:

[Keeping Children Safe in Education](#) (KCSIE) (DfE September 2024) including the additional statutory guidance [Disqualification under the Childcare Act 2006](#) (DfE, August 2018) and the non-statutory advice for practitioners, [What to do if you're worried a child is being abused](#) (DfE, March 2015)

[Working Together to Safeguard Children](#) (WT) (DfE, March 2015)

[Prevent Duty Guidance: England and Wales 2023](#) (Prevent) (Home Office, March 2015)

For ease of reference, the above publications will be referred to throughout this policy as *KCSIE*, *WT* and *Prevent* respectively.

[Meeting Digital and Technology Standards in Schools and Colleges](#) (DfE, March 2022)

[The Equality Act 2010](#) and [The Equality Act 2010: guidance](#) (Government Equalities Office, February 2023)

This policy forms part of a set of documents and policies which relate to the safeguarding responsibilities of the School. As well as all school pastoral policies and health, safety & welfare policies, there are particular links with the following:

Anti-Bullying Policy

Safer Recruitment Policy

Restraint Policy & Physical Contact Policy for EYFS

Staff Code of Conduct (School Employment Manual)

Pastoral Care Policy

Curriculum Policy (including FBV and PSHE/RSE Policies and Schemes of Work)

Behaviour Policy

E-safety Policy (including IT Acceptable Use Policies for pupils & staff)

Whistleblowing Policy

This policy will be updated regularly (and at least annually) in line with changes to legislation and statutory guidance, as well as in the light of practical experience. The policy is checked for compliance and clarity and then approved annually by the full governing body at their autumn meeting but is also discussed in full whenever there are any amendments.

## Oversight and Governance

The School's Designated Safeguarding Governor is **Mrs Sarah Morgan**. She meets regularly with the DSL to review child protection policies, to audit the Single Central Register termly, and to check that staff training is up to date and that correct procedure has been followed in the case of any incidents. Checks are also made to ensure that the School is working with local agencies, communicating effectively and cooperating when needed. Safeguarding is an agenda item at all

Governors meetings. Additionally, at the end of the academic year there is an Annual Safeguarding Report to Governors. The Governors ensure that the DSL and the Deputy DSL have a job description, and that they have sufficient time and funding to carry out their roles.

## Definitions and Abbreviations

**Safeguarding** is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing the impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (Keeping Children Safe in Education, 2024).

**Child protection** is defined as the processes and structures which protect children who have been identified as suffering, or being at risk of suffering, abuse, neglect, exploitation or violence (Save the Children, December 2007).

**Staff** refers to all of those working for or on behalf of the School, full time or part time, temporary or permanent, in either a paid or voluntary capacity. All visitors to the School will be expected to adhere to the procedures within this policy, under the responsibility of the member of staff hosting the visitor and the DSL.

All abbreviations in this document are explained at the first point of mention, and follow the standard format as laid out in *KCSIE*. However, for ease of reference the most common are:

CSE: Child Sexual Exploitation  
DDSL: Deputy Designated Safeguarding Lead  
DSL: Designated Safeguarding Lead  
FBV: Fundamental British Values  
FGM: Female Genital Mutilation  
HBV: Honour-Based Violence  
MASH: Multi-Agency Safeguarding Hub  
PSHE: Personal, Social, Health and Economic Education  
RSE: Relationships and Sex Education  
HSCP: Hertfordshire Safeguarding Children Partnership

## Key Personnel

Name	Role	Contact
Cdre Andy Cree, CBE	Chairman of Governors	c/o Clerk to the Governors, Mr Edward Valletta (part-time) 07876 577329
Mrs Sarah Morgan	Designated Safeguarding Governor	c/o Bursar’s Office 01923 825669
Mr Michael Bond	Deputy Designated Safeguarding Governor	c/o Bursar’s Office 01923 825669
Mr Miles Chester	Head	01923 825648

Mr Andrew Crook	Deputy Head & Designated Safeguarding Lead (DSL)	01923 825648
Mrs Colette Quinlivan	Head of Pre-Prep & Deputy DSL at MTP and DSL for Early Years	01923 825648 01923 828857
Mr Antony McConnell	Senior Deputy Head & Deputy DSL	01923 825648
Mr Richard Waddington	Assistant Head (Wellbeing) & Deputy DSL	01923 825648

HSCP Child Protection Schools/Colleges Liaison Officer for MTP is Louise McCourts - 07814 077877 (louise.mccourts@hertfordshire.gov.uk )

## **Child Protection Procedures**

### **Early Help**

Early help is support given to a child or family, as soon as a problem emerges, to prevent escalating risk. All staff should be prepared to identify children who may benefit from early help and this should be immediately reported to the DSL and safeguarding team as a CPOMS incident. The School will act on identified concerns and direct families towards school-based or external services, following HSCP' [Continuum of Need](#) guidance.

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools
- 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
- misuses alcohol and other drugs themselves
- witnesses or perpetrates so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

### **Recognising and reporting signs of abuse**

All members of staff have a responsibility to identify the signs and symptoms of abuse, neglect and exploitation, to report concerns immediately, to share information in a timely manner and to act in the best interests of the child. All staff should be aware that children can be at risk of harm inside and outside of the School, inside and outside of home, and online. Staff are expected to maintain an attitude of 'it could happen here' where safeguarding is concerned.

Staff should report any and all worries or concerns of potential abuse via CPOMS (or in person to the DSL or a member of the Safeguarding Team, if for any reason they cannot access CPOMS). Members of staff should not investigate concerns or suspicions: it is not their responsibility to decide whether

or not a child has been abused. If at any point, there is risk of immediate serious harm to a child, a referral will be made to the local authority where the child is resident immediately. Alternately the School may contact the local authority for advice before any investigation takes place. The School will normally inform a pupil's parents when contact is being made with a statutory agency (unless doing so would put the child at further risk) but there is not a requirement for parental consent for referrals to statutory agencies and this should be taken into consideration when parents may be involved in the abuse.

For convenience, the most common Local Authority contacts are listed here:

Local Authority	Contact number	Other	
Buckinghamshire MASH	01296 383962	Out of hours 0800 999 7677	<a href="mailto:secure-cypfirstresponse@buckscc.gov.uk">secure-cypfirstresponse@buckscc.gov.uk</a>
Harrow MASH	0208 8901 2690	Out of hours 0208 424 0999	
Hertfordshire MASH	0300 123 4043 (24h)		
Hillingdon MASH	01895 556644	Out of hours 01895 250111	

All staff are trained to understand that anybody can make a referral to external agencies. They can do this by telephoning the relevant numbers above. However, the Safeguarding Team have significant training in such matters and are considered the best people to liaise with outside agencies. This will be carried out using the procedure as set out in the relevant Safeguarding Partnership's procedures and policies.

### **Confidentiality and sharing data**

All staff should be aware that DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the DSL. Further guidance can be found at <https://www.gov.uk/guidance/data-protection-in-schools>. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. The School recognises that matters relating to safeguarding and child protection are sensitive and confidential and staff are expected to balance the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant colleagues and external agencies, in the best interests of the child. Staff should never promise a child that they will not tell anybody about an allegation, as this may not be in the best interests of the child.

### **Recognising Abuse**

Abuse is a form of maltreatment of a child (KCSIE). Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Contextual safeguarding** recognises that as young people grow and develop, they are influenced by a whole range of environments and people outside of their family, in the local community and online. Children may encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that children may encounter multiple risks. Staff work with the local

community, including other local schools, and external agencies to understand these risks, engage with children and help to keep them safe. Staff are trained to recognise signs of abuse and harm that children may experience in contexts and relationships beyond their families.

There are four principal categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect. These are defined below (KCSIE) along with some possible indicator. Whilst indicators will rarely, in isolation, provide conclusive evidence of abuse they should be viewed as part of a jigsaw and should always be reported to the DSL when observed.

<p><b>Physical Abuse:</b> A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.</p>	<p><b>Signs of Physical Abuse:</b></p> <ul style="list-style-type: none"> <li>- unexplained injuries or burns</li> <li>- improbable excuses given to explain injuries</li> <li>- refusal to discuss injuries</li> <li>- untreated injuries</li> <li>- admission of excessive punishment</li> <li>- bald patches</li> <li>- withdrawal from physical contact</li> <li>- arms and legs kept covered in hot weather</li> <li>- fear of returning home</li> <li>- fear of medical help</li> <li>- self-destructive tendencies</li> <li>- aggression towards others</li> <li>- running away</li> </ul>
<p><b>Emotional Abuse:</b> The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p>	<p><b>Signs of Emotional Abuse:</b></p> <ul style="list-style-type: none"> <li>- delay in physical, mental and emotional development</li> <li>- admission of excessive punishment</li> <li>- over-reaction to mistakes</li> <li>- sudden speech disorders</li> <li>- fear of new situations</li> <li>- inappropriate emotional responses to painful situations</li> <li>- neurotic behaviour (e.g. rocking, hair twisting, thumb-sucking)</li> <li>- self mutilation</li> <li>- fear of parents being contacted</li> <li>- extremes of passivity or aggression</li> <li>- drug/solvent abuse</li> <li>- running away</li> <li>- child criminal exploitation</li> </ul>
<p><b>Neglect:</b> The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide</p>	<p><b>Signs of Neglect:</b></p> <ul style="list-style-type: none"> <li>- constant hunger</li> <li>- poor personal hygiene</li> <li>- constant tiredness</li> <li>- poor state of clothing</li> <li>- emaciation</li> <li>- frequent lateness or non-attendance at school</li> </ul>

<p>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.</p>	<ul style="list-style-type: none"> <li>- untreated medical problems</li> <li>- destructive tendencies</li> <li>- low self esteem</li> <li>- neurotic behaviour</li> <li>- no social relationships</li> <li>- running away</li> <li>- compulsive stealing or scavenging</li> </ul>
<p><b>Sexual Abuse:</b> Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see Child-on-Child abuse)</p> <p><b>Child Sexual Exploitation (CSE)</b> acts that encourage children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).</p> <p>Sexual abuse may also be in the form of <b>Female Genital Mutilation (FGM)</b>. If FGM is suspected, the police and the multi-agency referral and assessment team must be informed immediately.</p>	<p><b>Signs of Sexual Abuse:</b></p> <ul style="list-style-type: none"> <li>- unexplained or inconsistently explained physical injuries</li> <li>- repeat bruising; bruising of different colours; burn injuries</li> <li>- reluctance to talk about an injury</li> <li>- dramatic changes in behaviour e.g. more introverted,</li> <li>- lacks confidence, more aggressive or more bullying,</li> <li>- anti-social behaviour, truancy</li> <li>- peer relationship problems</li> <li>- regression to wetting or soiling</li> <li>- frequent urinary tract infection or trips to the toilet</li> <li>- emotional dependence on adults other than parents</li> <li>- frequent request to see the school nurse</li> <li>- avoidance of PE or swimming lessons (possibly hiding injuries or fear of vulnerability when changing)</li> <li>- self-harming</li> <li>- attention seeking beyond norm for age</li> <li>- sexualised play or sexualised language beyond norm for age</li> <li>- unexplained access to large amounts of money or high spending patterns</li> <li>- appears frightened of, or is abnormally attached to, parent/s or carer/s</li> </ul>

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual or non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Below are some safeguarding issues all staff should be aware of:

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional (as defined in the [Domestic Abuse Act, 2021](#)). Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse) all of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

## **Anti-Radicalisation/Anti-Extremism: The Prevent Duty**

Where risks of vulnerability to being drawn into terrorism are suspected or confirmed, staff should make a referral to the PREVENT team at [prevent@herts.pnn.police.uk](mailto:prevent@herts.pnn.police.uk), using the referral form online at the HCSP. The non-emergency DfE advice line can be reached via [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk), <https://report-extremism.education.gov.uk/> or 0207 340 7264. More details of the School's approach to the Prevent Duty can be found in Appendix 3.

## **Honour-Based Violence, including Female Genital Mutilation**

Staff should be aware that there is a mandatory referral for all concerns regarding Female Genital Mutilation, which includes concerns raised through direct evidence from a family member (e.g. brother). FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police; **contact Hertfordshire Police on 101 (from within Hertfordshire) or 01707 354000**

## **Mental Health**

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

Staff are trained to have an awareness of pupils whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Although only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff know that they can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

Staff should consider when concerns regarding a child's mental health might be a safeguarding issue and how to act accordingly. If the mental health issue has a safeguarding dimension, then immediate action should be taken, following the Child Protection procedures and making an immediate report on CPOMS and/or speaking to the DSL or a member of the Safeguarding Team.

## **Serious violence, Child Criminal Exploitation (CCE) and county lines**

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

CCE is a form of abuse which occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. 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.

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

Indicators that may be present when a child is being exploited through involvement in county lines include children who go missing (from school or home) and are subsequently found in areas away from their home; have been the victim, perpetrator or alleged 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.

### **Child-on-Child abuse**

All staff should be aware that children can abuse other children and that it can happen both inside and outside of school and online. All staff should understand that even if there are no reports in the School, it does not mean it is not happening; it may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should report these to the DSL via CPOMS.

Staff should challenge and report inappropriate behaviours between children that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

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 children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Staff should be able to reassure children reporting child on child abuse that they are being taken seriously and that they will be supported and kept safe. All children involved in such incidences will be treated as “being at risk” and supported appropriately, without judgement, and procedures put in place to minimise the risk to all parties. We also recognise the gendered nature of child-on-child abuse (i.e. more likely that girls will be victims and boys perpetrators), but all child-on-child abuse is unacceptable and will be taken seriously. Any such abuse will be referred to the local authority as a child protection concern. Abuse is abuse and will never be tolerated or passed off as banter, just having a laugh or part of growing up.

Pupils are able to freely report instances of child-on-child abuse through a full range of pastoral support mechanisms in place at the School, including, but not limited to, tutors, Heads of House, School Nurse and School Counsellor.

### **Investigating the sharing of nude and semi-nude images/videos**

‘Sharing nudes and semi-nudes’ means the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts. Nude or semi-nude images, videos or live streams may include more than one child or young person.

Incidents may range from aggravated, adult-involved child abuse (grooming or ‘sextortion’) through to youth-only romantic incidents. Staff need to be able to respond swiftly and confidently to make sure children and young people are safeguarded, supported, and educated. The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of any children involved.

If an incident of sharing nudes or semi-nudes occurs it must be reported to the DSL immediately. Do not view the image or ask the child to share or download it, this is illegal. Do not upload the image to CPOMS. If it was shown to you before you could ask them not to, report this immediately to the DSL. Do not delete it or ask the child to delete it. Do explain that you need to report it and confiscate the device without looking at the content, handing it over the DSL.

The DSL will hold an initial meeting with the appropriate staff to categorise the incident and assess the behaviours of any child or young person involved to identify any immediate risks. Parents will be informed at an early stage. If there is any concern a child is at risk of harm a referral should be made to children’s social care and/or the police immediately. Further guidance can be found at [Searching, Screening and Confiscation, Advice for School](#) (DfE July 2022) and [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) ( March 2024)

### **Children Missing from Education**

A pupil going missing from education is a potential indicator of abuse or neglect and to help ensure that pupils do not go missing from education in the long term the following steps will be taken: where a pupil's name is going to be deleted from the admission register, the School will inform the local authority in which the pupil resides. This will be done when a pupil has been taken out of school to be home educated, when the family has apparently moved away, when the pupil has been certified as medically unfit to attend school, when the pupil is in custody for more than four months or when he has been permanently excluded.

In cases where a pupil has had ten days of unauthorised absence (other than for reasons of sickness or leave of absence), failed to attend regularly or his name is to be deleted from the school register where the next school is not known, a report will also be made to local authority in which child resides. The Head’s PA will make such reports.

Staff are aware that absence from education repeatedly and/or for prolonged periods can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. Where children leave the School, we ensure their Child Protection information is copied for any new school but transferred separately from the main pupil file. Where reasonably possible we have more than one emergency contact number for each pupil.

In cases where pupils run away or go missing during the school day the School’s ‘Lost Child Procedure’ should be followed. After the pupil has been found the follow up should include a consideration of the reasons for the pupil going missing, and if there is a safeguarding concern the DSL should be informed. If a child fails to turn up for school and the reason is unknown, then the Absence Secretary will phone the parents immediately to ascertain the reason.

## **Responding to safeguarding and child protection concerns (see Appendix 6)**

All staff are trained on how to handle a disclosure or report from a child. It is essential that children are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. A child should never be given the impression that they are creating a problem by reporting abuse. Nor should a victim ever be made to feel ashamed for making a report.

Staff understand that they should listen carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was. See Appendix 5 for further guidance.

The School uses CPOMS to record all child protection and safeguarding issues. Incidents are logged by anyone dealing with a child when there are concerns about the welfare of that child, e.g. poor attendance, appearance and dress, changed or unusual behaviour, health and emotional well-being of the child, deterioration in educational progress, any discussion with parents about the concern, the response of parents to staff and the child and home conditions.

All records and subsequent reports are factual, non-judgmental, clear, accurate and relevant. Where CPOMS is not available, staff may speak to the DSL (or a member of the safeguarding team) or, in the unlikely event CPOMS and the safeguarding team are not available, staff can complete a written Record of Concern Form (Appendix 2) for the DSL. Staff should always be aware of the need for confidentiality and the requirement to follow-up to ensure that the written information has been received and then transferred to CPOMS.

The DSL and safeguarding team create an open environment where staff can approach any member of the team with questions or concerns: professional curiosity is encouraged and staff are regularly reminded to maintain the attitude of 'it could happen here'. The School will do everything in its power to ensure that those affected by safeguarding and child protection issues are supported. In the case of child-on-child abuse this includes victims, the perpetrators and other children investigated.

Staff are aware of the process for making referrals and are trained to differentiate between safeguarding children who have suffered or are likely to suffer harm (Section 47) and those who are in need (Section 17) of additional support. For Section 47 a referral would be made immediately to children's social care which is the local authority children's social care services, and if appropriate also the police. Those who are in need of additional support may receive it from one or more agencies through Early Help from Team Around the Child (TAC) or Common Assessment Framework (CAF) or, in Hertfordshire, Families First.

Internal support systems are in place that include counselling sessions with the School Counsellor and, if felt appropriate, referral to outside specifically trained counsellors.

The School places great importance on listening to each and every pupil and responding to their concerns. The School regularly uses surveys such as Anti-Bullying to assess pupil's experiences around the School site and outside of school, to identify times and spaces where pupils feel more or less safe. The School responds to these reports individually or by changing school processes.

Children are taught about safeguarding and online safety throughout their time at MTP, through the Pastoral Curriculum. Pupils undertake Relationship and Sex Education at appropriate times in accordance with the separate RSE Policy, which is regularly updated in the light of changing government guidance and/or legislation. Serious incidences of poor behaviour, e-safety concerns, racist and bullying incidents, sexual violence or harassment are all logged by staff on CPOMS. The

DSL, SLT and the Pastoral Committee regularly review these incidents and use them to update the Pastoral Curriculum to address specific safeguarding or pastoral needs.

## **SEND**

Children with special educational needs and/or disabilities and 'looked after children' are particularly vulnerable and all staff should recognise that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

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

## **Safeguarding by external parties and off site**

When services or activities are provided by an external party, the School ensures that the body concerned has appropriate safeguarding and child protection policies and procedures in place and that there are arrangements in place to liaise with the School on these matters, where appropriate. This applies regardless of whether the children attending the activity are on the School roll. Safeguarding requirements are a condition of use and occupation of the School premises by external parties and failure to comply with this leads to a termination of the agreement.

The School values educational visits and all adults involved have a responsibility to safeguard and promote the welfare of pupils during off-site visits and learning outside the classroom.

## **STAFF RECRUITMENT AND TRAINING**

The School operates safe recruitment procedures including DBS checks, keeping a robust Single Central Register (SCR) and compliance with Independent School Standards Regulations (ISSRs). *KCSIE* is adhered to in the Safer Recruitment Policy. The School also ensures that appropriate checks have been made on the employees of any organisation that have responsibility for the School's pupils away from the School site. The School also carries out checks for internal promotions to management in line with section 128. Any unescorted volunteers that will be spending time with children will have a DBS check carried out, as well as all other required recruitment checks for volunteers.

## **Induction of Staff and Governors**

The School is committed to supporting and training all staff in matters of child protection as soon as they start at the School, if not before. They are informed of what to do if they have concerns about a child and if a child makes a disclosure to them or they suspect signs of abuse. Staff are also given guidance on 'early help' outlining children who may benefit from early help.

On joining the School all staff, teaching and support and including temporary staff and volunteers, are directed to the School's Safeguarding Policy, the Safeguarding Code of Conduct, and Part One *KCSIE* (which includes Annex B 'Further Information' in its own Annex). They also receive induction training from the DSL and sign to confirm that this has been received and has covered at least the following:

1. The identity of the DSL and other Safeguarding Team Members
2. Receipt of Safeguarding documents (including the Safeguarding Policy, *KCSIE* Part 1 (including Annex B 'Further Information'), Safeguarding Code of Conduct)
3. How to access all relevant Safeguarding documents/other relevant policies
4. What is a Safeguarding concern and how to identify it
5. How to communicate any Safeguarding concerns, including the use of CPOMS and the Record of Concern Form and how to make a direct referral
6. Specific Safeguarding issues, including Prevent, FGM, Child-on-child abuse

7. How to handle a disclosure from a pupil
8. What to do in the event of an allegation against a member of staff
9. All points in the Safeguarding Code of Conduct

Signed confirmation of receipt of Safeguarding Induction is retained in the staff member's HR file.

In addition, all teaching staff are able to access the Staff Handbook and further electronic links to all relevant School policies, including those enumerated at the start of this policy and which have direct relevance to safeguarding.

All Governors are scheduled to have a Safeguarding Induction as above when they first visit the School on their Governor's visit day and are encouraged to do regular online Safeguarding training.

### **Regular Training**

Although there is no longer a set frequency for formal regular staff refresher training, the School provides training and safeguarding updates for all staff at least annually on INSET days and staff meetings. Staff are also regularly updated on information from any relevant external agencies and from HSCP (Hertfordshire Safeguarding Children Partnership) to determine the most appropriate schedule or follow their published advice, if any, concerning the level and focus for training. All staff sign to say they have received training and understood its contents, and it covers at least the information contained in the Safeguarding induction programme listed above. Those members of staff that are absent from the INSET training are given a copy of the information and have an opportunity to discuss its contents with senior staff prior to signing the documentation. All Safeguarding Team members receive specific DSL training at least every 2 years. Certificates are held in HR files.

All staff have an awareness of safeguarding issues through their regular training. However, in addition, expert and professional organisations will be used to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information can be found on the TES and the NSPCC websites. Staff can access government guidance on the issues listed below via GOV.UK and other government websites and they are encouraged to do so if they seek further guidance. Some such issues are;

- Abuse, including domestic abuse, relationship abuse and faith-based abuse
- bullying including cyberbullying, including child-on-child abuse
- children and the courts (including 12-17 year old witnesses in criminal courts)
- children missing from education, home or care
- children with family members in prison
- child abduction and community safety incidents
- child exploitation, including criminal exploitation (e.g. County Lines), Child Sexual Exploitation (CSE) and trafficking
- cyber-crime
- drugs
- so-called "Honour Based Violence" (HBV), including female genital mutilation (FGM) and Forced Marriage (FM)
- health and wellbeing, including fabricated or induced illness, children with medical conditions and mental health
- greater safeguarding vulnerability of certain groups of children, including girls, children with SEND, and LGBT children
- homelessness
- modern slavery and the National Referral Mechanism
- online, including sexting and sharing (consensual or non-consensual) of youth-produced sexual imagery
- private fostering
- radicalisation, including Prevent duty
- violence, including gangs and youth violence
- sexual violence and harassment between children and violence against women and girls

Our Local Education Authority is Hertfordshire, and all our training is in line with HSCP (Hertfordshire Safeguarding Children Partnership) procedures, with staff attending both internal and external training courses. Therefore, the School operates in line with locally agreed inter-agency procedures. The staff have training and updates/meetings with outside agencies where relevant, to make them aware of how to differentiate between safeguarding children who have suffered or are likely to suffer significant harm, and those who are in need of additional support from one or more agencies.

The Safeguarding Governor receives specialist Safeguarding training through an external agency at least once every two years. In addition, all Governors are encouraged to complete some form of Safeguarding training, whether through the online platform Educare or by giving confirmation that they have had appropriate safeguarding training elsewhere.

## **INTERNET SAFETY & ONLINE TEACHING**

Staff are aware of the safeguarding risks posed to pupils through the use of the internet, in particular the risk to online safety and the potential for child-on-child abuse. Pupils are not permitted to use networked mobile devices in school during the school day, and school devices are monitored during school hours for inappropriate use, with safeguarding procedures followed for any pupil identified to be at risk. Pupils recognise inappropriate online behaviour and know how to report it to staff.

All pupils are taught about internet safety in their Computing lessons and whenever discussion or concerns arise. Pupils are taught how to adjust their behaviour in order to reduce risks and build resilience, including to radicalisation. Particular attention is paid to the safe use of electronic equipment and the internet. Internet safety is an integral part of the School ICT curriculum. All staff should have regard to the School's IT Acceptable Use Policy (for pupils and staff) and the School's E-Safety Policy, which lists in detail the ways in which this is supported, through the curriculum, additional training, internet systems and safety measures (including filtering) and the School's approach to personal electronic devices.

The School has robust IT filtering and monitoring systems in place for its IT systems. The DSL is responsible for this and works closely with the Senior Deputy Head (DDSL) in ensuring these are appropriate, effective and meet the DfE's filtering and monitoring standards and the School's safeguarding needs. All staff receive regular training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

On occasion it may prove necessary to continue support some pupils remotely. In these instances the following online safeguarding measures apply:

### **Children and online safety away from school**

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding Policy and where appropriate referrals should still be made to children's social care and as required, the police. Online teaching should follow the same principles as set out in each School's existing policies, guidance and code of conduct. Merchant Taylors' Prep will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

### **Code of Conduct for delivering virtual lessons**

- Staff should only use school-registered accounts, never personal ones;
- Staff should only use systems that SLT have approved (check if unsure, but approved include M-S Teams, Zoom, Skype, Seesaw);
- Staff should ensure that, when livestreaming, they and their pupils have a safe and appropriate place with no bedrooms/inappropriate objects/information visible;

- Staff should take care not to livestream by mistake;
- Staff should ensure that at least one other colleague is a co-owner of any Team and/or can join in on any livestream at any point (this will typically be the Head of House for tutors, or the Head of Department for academic classes);
- Staff should only livestream during the equivalent lesson time in the timetable, or through a meeting scheduled in the 'Calendar' function of Teams;
- All Acceptable Use Policy agreements are still in force for all staff and all pupils, this includes the illicit recording of staff.

#### **Code of Conduct for one-to-one Skype correspondence for pupils in Nursey to Year 4**

- Skype conversations must be approved by SLT first;
- Date/time of the conversation will then be agreed with the parent;
- All Skype conversations will take place on a school registered account with a parent registered account (not one belonging to a pupil);
- Conversations take place in a safe and appropriate place (ie not a bedroom) and in appropriate dress;
- A parent must be seen in the background of the conversation so pupils should not use the blur function;
- Teachers will keep a log of their conversation (who, when, what) on iSAMS;
- Teachers, parents and pupils should not make a video or recording of the conversation;
- Parents will email acceptance of this Code of Conduct before any conversation is arranged.

#### **WHISTLE BLOWING**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and that such concerns will be taken seriously by the Senior Leadership Team. To support this staff should be aware of the School's Whistleblowing Policy.

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

- The Government's general guidance can be found on whistleblowing at [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing);
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the School. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

#### **SAFEGUARDING CONCERNS & ALLEGATIONS REGARDING SCHOOL STAFF, SUPPLY STAFF AND VOLUNTEERS**

The following procedure applies when a member of staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children; or

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

Concerns about staff, supply staff, contractors or volunteers that do not meet this “harms threshold” are referred to by KCSIE as **low-level concerns** and the procedures for these are discussed at the end of this section.

As part of their Safeguarding Induction all staff discuss and sign to confirm that they have read the Safeguarding Code of Conduct. They also discuss and sign the IT Acceptable Use Policy prior to starting at the School. Therefore, the expectations for staff behaviour are made clear to all staff. Governors realise that because of their daily contact with children in a variety of situations, including the caring role, teachers and other school staff are vulnerable to accusations of abuse. The Governors, therefore expect all staff to follow the Government procedures set out in *‘Dealing with allegations of abuse against teachers and other staff (part 4 of KCSIE)*.

Members of staff who hear an allegation of abuse against another member of staff, supply staff or volunteer or who witness abuse should report the matter immediately to the Head so that appropriate action can be taken; this includes allegations against the DSL and allegations involving an organisation or individual using the School’s premises. If the allegation is against the Head, it should be taken directly to the Chairman of Governors or in his absence, the Designated Safeguarding Governor, **without informing the Head**. If the Head is deemed to have a conflict of interest then the report should be made directly to the LADO. An allegation against a teacher who is no longer teaching at the School or historical allegations will be referred by the Head to the police.

Any allegation made against a teacher, other member of staff, supply staff, contractor or volunteer will be dealt with quickly and in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. In the first instance, before any investigation is undertaken, the Head or Chairman of Governors will immediately or certainly within one working day contact the Hertfordshire Safeguarding Children Partnership Designated Officer using the LADO Referral Form (or Tel: 01992 555420) to discuss the allegation and agree a course of action including any involvement of the police; if a crime has been committed the police must be informed. The School will not undertake their own investigations of allegations without prior consultation with the Local Authority Designated Officer (LADO) (or designated officer or team of officers), or in the most serious cases, the Police, so as not to jeopardise statutory investigations. GDPR cannot be allowed to stand in the way of safeguarding children. The School does not require parental consent before reporting allegations to the LADO (or designated officer or team of officers). In borderline cases, discussions with the LADO (or designated officer or team of officers) can be held informally and without naming the School or individual.

Discussion with the LADO should be recorded in writing, and communication with both the individual and the parents of the pupil(s) agreed. Consideration must be given as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The Designated Officer will provide advice and will preside over the investigation of the allegation; weight will be given to the views of the LADO (or designated officer or team of officers), KCSIE, WT and School policies when making a decision about suspension. 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. The School will make every effort to maintain confidentiality while an allegation is being investigated or considered. Any investigation will follow the procedures suggested in Part Four of *KCSIE*.

If the School dispenses with a person’s (employed, contracted, a volunteer or a student) services, or would have dispensed with their services had they not resigned, because they have caused harm or posed a risk of harm to a child then this will be reported within one month to the Disclosure and Barring Service (DBS). If a teacher is dismissed (or would have been dismissed had they not resigned) because of unacceptable professional conduct, conduct that may bring the profession into



disrepute, or a conviction at any time for a relevant offence a referral will be made to the Teaching Regulation Agency (TRA).

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

### **Low Level Concerns**

Concerns that do not meet the harms threshold laid out above should still be treated seriously and appropriately. According to KCSIE, a low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the School or college may have acted in a way that:

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

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

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Should someone have any concern about a staff member, supply teacher or volunteer which does not meet the harms threshold that would require informing the Head, then they should still raise these concerns with either a DSL, Deputy DSL, or the Head. The Head, DSL or Deputy DSL will speak with both the staff member raising the concern and the staff member who is the subject of the concern. A determination will be made about the next appropriate steps and a record will be kept on the staff member’s HR file marked confidential.

## APPENDICES

### **Appendix 1: Designated Safeguarding Lead and Deputy Designated Safeguarding Lead Job Descriptions**

#### **Roles & Responsibilities: Designated Safeguarding Lead**

The areas of responsibility for the DSL are as follows (and are taken from Annex C of *KCSIE*):

#### **Manage referrals**

The Designated Safeguarding Lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the police as required.

#### **Work with others**

The Designated Safeguarding Lead is expected to:

- liaise with the Head to inform him or her of issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the Designated Officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise for staff.

#### **Undertake training**

The Designated Safeguarding Lead (and any deputies) undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years.

The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school and college;

- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School or college may put in place to protect them.

### **Raise Awareness**

The Designated Safeguarding Lead should:

- ensure the School's child protection policies are known, understood and used appropriately;
- ensure the School's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School or college in this;
- link with the local LSP to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

### **Child Protection File**

- Where children leave the School the DSL should ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

### **Availability**

- During term time the Designated Safeguarding Lead or a deputy should always be available (during school hours) for staff in the School to discuss (in person or over the phone) any safeguarding concerns.

### **In addition to the above, the DSL has responsibility for the following:**

- Ensuring annually that all staff, including volunteers:
  - Attend an in-house Safeguarding refresher session;
  - Read and understand the School Safeguarding Policy, the Staff Code of Conduct, information on the Prevent Duty and the mandatory reporting of FGM, and Part One of *KCSIE*.
- In addition to the above, ensuring that all staff (or volunteers) who work directly with children:
  - Complete an online Level 1 Safeguarding Course;
  - Read and understand Annex A of *KCSIE*.
- Ensuring that all staff who join the School immediately receive a Safeguarding Induction that includes all of the above as appropriate.
- Ensuring that an accurate record of staff attendance of induction refresher training is maintained.
- Notifying the appropriate LSP if a child with a child protection plan is absent for more than two days without explanation.
- Considering how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT), Personal, Social, Health and Economic Education (PSHE) and/or Relationships and Sex Education (RSE).
- Working with the Head of PSHE, the IT department and the Senior Deputy Head to ensure all staff and pupils are aware that much abuse can take place online, the safeguarding risks that children can be exposed to online, and that everyone should be regularly trained and educated about how to stay safe online.
- Ensuring appropriate safeguarding responses are in place and are implemented to deal with pupils who go missing from the School, in particular any pupils who go missing on repeat occasions. The School has a separate Attendance and Absence policy.

- Understanding safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.
- Monitoring pupils over whom a child protection concern has been raised, but after referral to or advice from the appropriate LSP are judged not to be at risk of child abuse, using CPOMS and adding to the Monitoring List (vulnerable pupils); such pupils may need additional support from one or more agencies and an inter-agency assessment will be sought where appropriate.
- Ensuring that bullying incidents will be treated as child protection concerns when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, from significant harm' (for a definition of significant harm see below). In such circumstances a report will be made to the LSP.
- Facilitating and supporting the development of a whole school policy on Child Protection.
- Attending case conferences or nominating an appropriate member of staff to attend.
- Maintaining records of case conferences and other sensitive information in a secure confidential file and to disseminate information about the child only on a 'need to know basis'.
- Passing on records and inform the key worker when a child who is on the Child Protection register leaves the School. The custodian of the register must also be informed.
- Ensuring that checks are made that external organisations working with MTP pupils away from the School site have appropriate Child Protection procedures.

### **Deputy DSLs**

In the absence of the DSL, the functions of the DSL will be carried out by the deputy DSL. In this policy, reference to the DSL includes the deputy DSL where the DSL is unavailable.

## Appendix 2: Safeguarding Referral Form

# RECORD OF CONCERN FORM

*In the event that concerns cannot be recorded on CPOMS or by speaking to the DSL or DDSL in person, please complete and hand in at the DSL office.*

Pupil's Name:	
Tutor:	Tutor Group:
Date and time of concern:	
Account of the Concern (what was said, observed, reported and by whom)	
Your response (what did you do/say following the concern)	
Name of person reporting the concern:	
Signature of person reporting the concern:	
Position in School:	
Date and time of this recording:	
Response of DSL	
DSL Signature	

## Appendix 3: Prevent Duty

### Policy on preventing extremism and radicalisation

#### Principles

Merchant Taylors' Prep is committed to providing a secure environment for pupils where they are kept safe and feel safe. All staff and volunteers working at the School recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not. The School recognizes its duty to counter terrorism in all its forms; under the Counter Terrorism and Security Act 2015 the School has a statutory duty to have due regard to the need to prevent people from being drawn into terrorism. The School also undertakes a regular risk assessment concerning those pupils who may be at risk of radicalisation. This policy is one element within our overall school arrangements to Safeguard and Promote the Welfare of all Children in line with our statutory duties and should be read in conjunction with the School's Safeguarding Policy.

This Policy draws upon the guidance contained in the following publications:

*KCSIE: Keeping Children Safe In Education*, September 2023 (including the additional statutory guidance *Disqualification under the Childcare Act 2006*, June 2016, and the non-statutory advice for practitioners, *What to do if you're worried a child is being abused*, March 2015)

*Prevent: Prevent Duty Guidance: for England and Wales*, April 2021

#### School ethos and practice

The School uses the following accepted Governmental definition of extremism, which is:

'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

There is no place for extremist views of any kind at Merchant Taylors' Prep. Our aim is that pupils see our school as a safe place where they can explore controversial issues safely. As a school we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for children and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views we are failing to protect our pupils.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.

The School provides a broad and balanced curriculum, delivered by skilled professionals, so that our pupils are enriched, they understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and not marginalised. Furthermore, we are aware that young people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times pupils may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and where appropriate dealt with in line with our Behaviour Policy for pupils and the Safeguarding Code of Conduct for staff.

As part of wider safeguarding responsibilities school staff will be alert to:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups.
- Graffiti symbols, writing or art work promoting extremist messages or images
- Pupils accessing extremist material online, including through social networking sites

- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Reports of issues affecting pupils in other schools or settings
- Pupils voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or ‘hate’ terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, sexual orientation or identity, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

The School will employ suitable levels of filtering in its IT systems to protect pupils as far as is possible from terrorist and extremist material when accessing the internet via the School network.

### **Teaching Approaches**

Merchant Taylors’ Prep promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. Pupils are expected to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. The School promotes these values through assemblies, PSHE and across the whole curriculum with a focus on SMSC. We will ensure that our teaching approaches help our pupils build resilience to extremism and radicalisation, and give pupils a positive sense of identity through the development of critical thinking skills. We will ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it. The School will also regularly audit SMSC across the curriculum and report to the Education Committee.

### **Use of External Agencies and Speakers**

Merchant Taylors’ Prep encourages the use of external agencies or speakers to enrich the experiences of our pupils; however, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our pupils to ensure their suitability. External speakers and anyone contributing to workshops and training in general will be treated as escorted visitors and will be badged appropriately and be supervised during their time in the School. Staff and pupils (via the sponsoring member of staff) arranging such visits should consult the School policy ‘Visiting Speakers – Policy and Protocol’ and follow the instructions provided.

### **Referring Concerns**

Where there are concerns of extremism or radicalization (see Annex A for possible indicators) parents, pupils and staff should use our internal systems to raise any issue in confidence with senior management. Our lead personnel for Prevent is the DSL, who would normally be the first point of contact should there be concerns. The DSL, after appropriate consultation, will pass the matter to Children’s Services or to the local Channel Police Practitioner for advice and/or referral, keeping a record of that conversation and the action taken.

### **Child Protection**

Please refer to our Safeguarding Policy for the full procedural framework on our Child Protection duties. Staff will be alert to the fact that whilst Extremism and Radicalisation is broadly a safeguarding issue there may be some instances where a child or children may be at direct risk of harm or neglect. For example, this could be due to a child displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or staff may be aware of information about a child’s family that may equally place a child at risk of harm. (These examples are for illustration and are not definitive or exhaustive)

Therefore all adults working at Merchant Taylors’ Prep (including visiting staff, volunteers’, contractors, and students on placement) are required to report instances where they believe a child may be at risk of harm or neglect to the Designated Safeguarding Lead or to one of their deputies who will make a referral to children’s social care or to the local Channel Police Practitioner when appropriate.

## **Training**

As detailed in the main Safeguarding Policy, all staff, including temporary staff and volunteers, will receive an induction to our Safeguarding policy and procedures. This will include information and guidance about our duty to prevent people from being drawn into terrorism.

Whole school in-service training in regard to safeguarding and child protection will be organised for staff and volunteers at least every year and will comply with the prevailing arrangements approved by Hertfordshire Safeguarding Children Board and will, in part, include awareness raising on extremism and radicalisation and its safeguarding implications.

The Designated Safeguarding Lead will attend appropriate and relevant training courses in regard to safeguarding children, including the appropriate inter-agency training organised by the Safeguarding Children Board at least every two years. This will include accessing training on extremism and radicalisation and its safeguarding implications. The Designated Safeguarding Lead will ensure that all adults working in the School receive appropriate levels of training, guidance and support in regard to safeguarding children from extremism and radicalisation.

## **Recruitment and staff conduct**

The arrangements for recruiting all staff, permanent and volunteers, to our school will follow guidance for safer recruitment best practice in education settings, including, but not limited to, ensuring that DBS checks are always made at the appropriate level, that references are always received and checked and that we complete and maintain a single central record of such vetting checks. We will apply safer recruitment best practice principles and sound employment practice in general and in doing so will deny opportunities for inappropriate recruitment or advancement.

We will be alert to the possibility that persons may seek to gain positions within our school so as to unduly influence our school's character and ethos. We are aware that such persons seek to limit the opportunities for our pupils thereby rendering them vulnerable to extremist views and radicalisation as a consequence. Therefore, by adhering to safer recruitment best practice techniques and by ensuring that there is an ongoing culture of vigilance within our school and staff team we will minimise the opportunities for extremist views to prevail.

Deputy Head  
September 2024

## **End Note A**

### **Possible Indicators of radicalisation**

#### **Vulnerability**

- 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

#### **Access to extremism / extremist influences**

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - because either they associate directly with known individuals or because they frequent key locations, where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)



- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

### **Experiences, Behaviours and Influences**

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

### **Travel**

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/ young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/ young person employed any methods to disguise their true identity? Has the child/ young person used documents or cover to support this?
- Social Factors
- Does the child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/ young person have any learning difficulties/ mental health support needs?
- Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/ young person have a history of crime, including episodes in prison?
- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child/ young person have insecure, conflicted or absent family relationships?
- Has the child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?

- Is there evidence that a significant adult or other in the child/young person's life has extremist views or sympathies?

**More critical risk factors could include:**

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour
- If you have any concerns discuss them with your Safeguarding Lead and local Prevent Officer

**If you have any concerns, discuss them with the DSL/Deputy DSL.**

## **Appendix 4: Safeguarding Code of Conduct**

**(See also the Merchant Taylors' Prep Employment Manual: Code of Conduct for Staff and the School's Whistleblowing policy)**

The safeguarding culture of a school is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement. Relationships between staff and pupils should be friendly and mutually respectful.

If a member of staff feels threatened or compromised by the actions of a pupil or other member of the School community, a member of Senior Leadership Team should be approached for support. It is recognised that these guidelines do not cover every situation. Members of staff must always use their professional judgement and discretion.

### **Physical contact with pupils**

- Be wary about providing physical comfort or any demonstration of affection in the light of complaints that might be made. Not all children feel comfortable about certain types of physical contact; this should be recognised and wherever possible, adults should seek the pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed.
- Sporting activities - where exercises or procedures need to be demonstrated, extreme caution should be used if this involves physical contact with the pupils. Whenever possible, such contact should be avoided.
- Individual music tuition – physical contact may be necessary to show correct technique e.g. bowing when playing the violin, but such contact should be appropriate and kept to a minimum.
- Force used to avert an immediate danger - if action needs to be taken to protect a child (e.g. in the case of fighting) and physical intervention proves necessary, it should be the minimum force required to prevent injury (see Restraint Policy). Unless the situation is so urgent as to require immediate intervention, non-physical de-escalation techniques should be used initially. If physical force is used to restrain a child who is at danger to himself or is endangering others, it should be reported to senior staff as soon as possible after the incident) and a written report of what occurred should be sent to the Head within 24 hours. Any form of physical aggression towards pupils must be avoided.
- Staff giving intimate care must follow the School's intimate care guidelines. Refer to the Early Years Physical Contact policy for times when such contact may be necessary for young children.

### **Staff-Pupil/Former Pupil Relationships**

- Staff should not normally socialise with pupils other than at events arranged by the School and should be particularly careful in locations where alcohol is available. Where staff are parents of pupils, or friends with parents of pupils outside of school, they should use their professional judgement to act within the spirit of this guidance.
- Staff must not have a sexual relationship with a pupil or former pupil - it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.
- Staff should not communicate with pupils on social networking sites and should not communicate/connect online with young people who have been pupils at the School within the last two years. Care must be taken with all forms of communication with pupils including

electronic communication, which should be sent only from a school email address. Staff should report any concerns about inappropriate pupil contact to the Senior Deputy immediately.

- Staff supporting former pupils with academic guidance should communicate using school email systems and meet on the School site, within office hours in a professional manner.
- Details of home address, personal email address, and phone numbers should not be given to pupils or their parents. Do not divulge personal contact details of a colleague without consent.

## **Professional Behaviour**

- Staff Dress Code – be aware of what is and is not appropriate and maintain professional standards and boundaries.
- Accepting and giving gifts – consider the appropriateness of accepting or giving a gift to a pupil and discuss any such decisions with a senior member of staff.
- Confidential information – be aware of the School procedures for the sharing of information regarding a pupil. Staff are expected to balance the requirement for confidentiality with the need to share information with colleagues and external agencies to safeguard children (see the Safeguarding Policy for further guidance).
- Endeavour to prevent gossip spreading about pupils, parents, colleagues or other members of the School community.
- Take care to protect your own reputation and that of the School.
- Always be respectful in dealings with pupils, taking care to avoid the use of bad language or humiliation of a pupil.
- It is advisable to use a room with a window in the door or leave the door ajar when meeting with a child.
- Staff should only enter pupil toilets or changing rooms as part of their professional duties or if they have reason to suspect a child is at risk of harm.
- Staff should avoid giving lifts to pupils other than in school vehicles. If special circumstances make it necessary to use a privately owned car, permission must be sought from a member of SLT and the pupil's parent/carer beforehand, unless in the case of a medical emergency.

## **Taking photograph of pupils**

- Staff may take photographs and make videos of pupils in the course of their daily work, providing they have previously informed senior management of their intention and their proposals have been accepted. Photographs and videos should only be made using school cameras/devices and then must be downloaded to school computers. Images of children should not be taken when they are in a state of undress. Having made and used these records, in accordance with the professional discharge of their duties and responsibilities, they must delete them from any personal records, retaining them for the minimum time necessary. Should it be appropriate to make a permanent record, for example, of a dramatic performance, these should be retained centrally on the School's own database.
- Information and guidance on the use of mobile phones and cameras is contained in the Merchant Taylors' Prep Employment Manual and the MTP Acceptable Use Policy.

## Appendix 5: Practical Advice When Dealing with Disclosures of Abuse

If a child chooses to tell a member of staff about possible abuse, there are a number of things that the member of staff should do to support the child:

- Stay calm and be available to listen
- The pupil concerned will probably be worried about confidentiality - this often runs counter to the need to tell someone. Never promise to keep a disclosure to yourself - reassure the pupil that you will agree a course of action with him when you have heard what he has to say, and that it will all be handled very sensitively. Win his confidence, but **never promise confidentiality**.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the pupil.
- **Under no circumstances ask investigative or leading questions** – such as how many times this has happened, whether it happens to siblings too, or what does the boy’s mother think about all this.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid any censure of the pupil for not disclosing earlier. Comments like ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may lead the pupil to feel that they have done something wrong.
- At an appropriate time, tell the child that in order to help them you must pass the information on.
- Tell the child what will happen next. The child may agree to go with you to see the DSL.
- Make a note of exactly what is said, when it is said, where, and to whom.
- Make a record of any visible injuries, signs of neglect, and how they are said to have occurred.
- Immediately complete a CPOMS incident and/or inform the DSL or, when absent, one of his/her Deputies. If you speak to the DSL in person, they will ask you to write up the incident on CPOMS as soon as possible.
- Do not contact the pupil’s parents.
- Seek support from the DSL/DDSL if you feel distressed.
- If the allegation of abuse has been made against a member of the School staff, the procedure in **Safeguarding Concerns & Allegations Regarding School Staff, Supply Staff and Volunteers** should be followed.

Should other pupils or adults inform you of their suspicions of abuse, or should you yourself suspect it from what you see or hear, then these must be reported immediately to the DSL.

Deputy Head  
September 2024  
Review Date: September 2025

## Appendix 6: Safeguarding Concern Flowchart



