# SAFEGUARDING & CHILD PROTECTION POLICY

**Policy Custodian:** Head of MTP
**Approving Governors Committee:** Full Governing Body
**Approved by Governing Body:** November 2024
**Amended:** September 2025
**Next Review:** November 2026

## Introduction and Key Principles

At Merchant Taylors' Prep School, safeguarding is integral to everything we do. It underpins our teaching, our pastoral care and our daily routine#s, and is central to our commitment to providing an environment in which all children feel safe, respected and valued.

We recognise that children flourish best when they feel secure, listened to and understood. Our safeguarding approach reflects this belief. It is built on strong relationships, professional curiosity, and a deep understanding of children's developmental needs. All staff, whatever their role, share responsibility for safeguarding and promoting the welfare of children, and are expected to act in the best interests of each child at all times.

We take a whole-school, child-centred approach to safeguarding and child protection. This means:

- Safeguarding is not limited to reacting to harm but includes the proactive promotion of wellbeing and early identification of need.
- All children at MTP are entitled to feel safe and supported, whether they are in Nursery, Reception or Year 6.
- Staff are trained to recognise that children may not always disclose abuse or neglect directly, and that non-verbal signs, changes in behaviour or quieter voices may still speak volumes.
- Safeguarding includes the prevention of harm online, in peer relationships, and from within or outside the home environment.

Safeguarding also runs through our excellent teaching and learning. Through strong adult-child relationships, developmentally appropriate feedback, and purposeful classroom interaction, staff are well placed to notice early changes and respond with care. Learning environments are designed to promote confidence, independence and trust, creating spaces where pupils feel secure enough to take risks, ask for help and talk to adults.

Our safeguarding culture is supported by visible leadership and clear structures. All members of staff are trained to report concerns, no matter how small, and know how to access the support of the Designated Safeguarding Lead (DSL) and Safeguarding Team. Visitors, volunteers and parents are also made aware of how to raise concerns or seek support.

All staff are required to:

Department
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Email: office@mtpn.org.uk

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- Read and understand Part One (and Annex B, where applicable) of Keeping Children Safe in Education (DfE, September 2025)

- Read and follow this Safeguarding & Child Protection Policy and the Staff Code of Conduct

- Know the identity and role of the DSL and Deputy DSLs

- Report any concerns via CPOMS, or speak to the DSL or Safeguarding Team directly if unable to access the system. Staff are also able to complete a Record of Concern Form (Appendix 2) which should be handed in to the DSL, 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.

- Uphold an open, respectful and alert safeguarding culture where questions, concerns and professional conversations are welcomed and followed through

- Visitors to the school can report safeguarding concerns directly to the Designated Safeguarding Lead or a member of the Safeguarding Team, either in person or by calling the school office on **01923 825 648** or by email to **office@mtpn.org.uk**

This policy applies to all children in the Prep School (ages 3–11), all of whom are considered to be children under child protection legislation.

The school's Local Safeguarding Partnership is Hertfordshire, and the three partners are Hertfordshire County Council, Hertfordshire Constabulary and Herts Valley CCG. We follow the procedures and protocols of the Hertfordshire Safeguarding Children Partnership (HSCP). Our work is underpinned by the principles and responsibilities laid out in Keeping Children Safe in Education (KCSIE, 2025), Working Together to Safeguard Children (2023), and the Continuum of Needs for Children and Young People in Hertfordshire (2025).

### 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 2025) 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, December 2023)
- Prevent Duty Guidance: England and Wales 2023 (Prevent) (Home Office, March 2024)
- 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)
- Working Together to Improve School Attendance (DfE, May 2022)

This policy also aligns with the procedures and thresholds outlined in the Continuum of Need for Children and Young People in Hertfordshire (2025–26).

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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 and safety policies, there are links with the following:

- Anti-Bullying Policy
- Safer Recruitment Policy
- Physical Contact Policy
- Staff Code of Conduct (School Employment Manual)
- Pastoral Curriculum Policy
- Behaviour Policy
- E-safety Policy
- Whistleblowing Policy
- School Visitors Policy and Visiting Speaker Policy
- Special Educational Needs and Disability Policy
- Early Years Policy

This policy is reviewed regularly — at least annually — and updated in line with changes to legislation, statutory guidance and best practice. It is reviewed for compliance and clarity and is approved annually by the Full Governing Body at its autumn meeting. The policy may also be reviewed and reapproved at other points in the year should any updates be required.

## Oversight and Governance

Merchant Taylors' Prep School is fully committed to meeting its statutory and moral responsibilities to safeguard and promote the welfare of all children. The Governing Body plays a vital role in providing strategic leadership and ensuring accountability in this area. The School's Designated Safeguarding Governor is **Mrs Jane Redman**. She meets regularly with the DSL to monitor the school's safeguarding practices and ensure that statutory duties are being fulfilled. Her responsibilities include:

- Meets regularly with the DSL to review safeguarding policies, procedures and practice
- Audits the Single Central Register termly
- Checks that staff safeguarding training is up to date and consistently delivered
- Reviews how the school responds to safeguarding concerns, ensuring correct procedures have been followed
- Confirms the school is working in line with local safeguarding protocols, and cooperating effectively with external agencies
- Ensures that the DSL and Deputy DSL have up-to-date job descriptions and sufficient time, capacity and training to carry out their responsibilities

Safeguarding is a standing item at all Governing Body meetings. In addition, an Annual Safeguarding Report is presented at the end of each academic year to summarise key actions, data and developments.

## Definitions and Abbreviations

### Safeguarding
Safeguarding is defined as:
- Providing help and support to meet the needs of children as soon as problems emerge

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- Protecting children from maltreatment, including harm that occurs online or outside the home
- 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
- Taking action to enable all children to have the best outcomes

*(Adapted from Keeping Children Safe in Education, 2025)*

### Child Protection

Child protection refers to the specific processes and structures used to protect children who are identified as suffering, or at risk of suffering, abuse, neglect, exploitation or violence.
*(Save the Children, 2007)*

### Staff

Throughout this policy, *staff* refers to all individuals working for or on behalf of Merchant Taylors' Prep School, whether in a full-time or part-time capacity, and whether employed, contracted, or volunteering. This includes temporary, agency and supply staff.

### Visitors

All visitors to the school, including volunteers, contractors and external speakers, are expected to adhere to this Safeguarding and Child Protection Policy under the guidance of their host member of staff and the DSL. Procedures for managing safeguarding expectations for visitors are outlined in the School Visitors Policy and the Visiting Speaker Policy.

All abbreviations are defined at their first point of use within this policy, and follow standard usage as set out in KCSIE. For ease of reference, the most frequently used abbreviations include:

- **CSE**: Child Sexual Exploitation
- **CPOMS**: Child Protection Online Management System
- **DDSL**: Deputy Designated Safeguarding Lead
- **DfE**: Department for Education
- **DSL**: Designated Safeguarding Lead
- **EYFS**: Early Years Foundation Stage
- **FBV**: Fundamental British Values
- **FGM**: Female Genital Mutilation
- **HBV**: Honour-Based Violence
- **HSCP**: Hertfordshire Safeguarding Children Partnership
- **MASH**: Multi-Agency Safeguarding Hub
- **PSHE**: Personal, Social, Health and Economic Education
- **RSE**: Relationships and Sex Education

### 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 Jane Redman | Designated Safeguarding Governor | See above |
| Mr Michael Bond | Deputy Designated Safeguarding Governor | See above |
| Mr Miles Chester | Head, Safeguarding Team | 01923 825 648 |
| Mrs Colette Quinlivan | Head of Pre-Prep, Designated Safeguarding Lead | See above |
| Mr Richard Waddington | Assistant Head (Pastoral), Deputy DSL | See above |

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| Mr Tony McConnell | Deputy Head (Operational), Safeguarding Team | See above |
| Mrs Gemma Ladbury | Assistant Head (EYFS), Safeguarding Team | See above |
| Mr Dominic Todd | Director of Sport, Safeguarding Team | See above |

**External Link Contact**
HSCP Child Protection Schools/Colleges Liaison Officer for MTP:
Louise McCourts
Tel: 07814 077877
Email: louise.mccourts@hertfordshire.gov.uk

At Merchant Taylors' Prep, safeguarding is deliberately embedded across all year groups and areas of school life. Our Safeguarding Team is broad and highly visible, reflecting our commitment to the principle in *Keeping Children Safe in Education* that safeguarding is **everyone's responsibility**.

By including leaders from the Early Years, Pre-Prep, Prep, Sport, and Pastoral teams, we ensure that every stage of a child's journey is represented. This ensures that concerns can be raised promptly with a trusted adult who knows the child and family well.
This structure also reflects the reality that parents often share information or concerns with the staff they see most frequently. Our model ensures these conversations are never held in isolation but are immediately connected to the wider safeguarding team.

Oversight remains with the **Designated Safeguarding Lead (DSL)** and **Deputy DSLs**, who provide consistency, accountability and decision-making. The wider team strengthens **accessibility, visibility, and professional challenge**.

This approach supports a safeguarding culture that is:
- **Proactive** – noticing and responding early
- **Joined up** – with strong internal communication
- **Responsive** – meeting the needs of every child

**Child Protection Procedures**
Merchant Taylors' Prep follows the statutory guidance in *Keeping Children Safe in Education (2025)* and *Working Together to Safeguard Children (2023)*. All staff have a duty to act if they are concerned about a child, and must follow the procedures outlined below. Safeguarding is everyone's responsibility, and no concern is ever too small to report.

### If a Child Discloses Information to a Member of Staff
If a child makes a disclosure — however vague, partial or unclear — the member of staff must:
1. Listen carefully, without interrupting or asking leading questions
2. Reassure the child that they have done the right thing in speaking up
3. Explain that you cannot promise confidentiality, and that information may need to be shared to keep them safe
4. Record the disclosure promptly and factually on CPOMS, using the child's own words where possible
5. Alert the Designated Safeguarding Lead (DSL) or Deputy DSL as soon as possible — in person, by phone or in writing
6. Do not speak to the child's parents or carers unless instructed to do so by the DSL

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### If a Staff Member Has a Concern About a Child
Staff must report any concern, however small, if they notice:
- Changes in mood, appearance, hygiene, energy or behaviour
- Signs that a child may feel unsafe, unwell or unsupported
- An accumulation of low-level concerns or a developing pattern
- Worrying home circumstances or safeguarding risks shared by parents

Concerns should be recorded immediately on CPOMS, with enough detail to support the DSL's understanding and response. Staff may also raise concerns directly with the DSL verbally, but must still follow up with a CPOMS entry.
If in doubt — record it and pass it on.

### DSL Action Following a Concern
The DSL (or a Deputy DSL) will:
- Review the concern promptly and decide on appropriate next steps
- Check for patterns or previous concerns
- Seek further information from staff, parents or external agencies if appropriate
- Make a referral to Children's Services (via MASH) if required
- Record all actions, decisions and outcomes clearly on CPOMS
- Provide appropriate feedback to the referring member of staff

## Early Help
Early help is the provision of targeted support for children and families as soon as a concern emerges, to prevent issues from escalating into more serious safeguarding risks. It is a vital part of the school's safeguarding strategy and is embedded in our culture of noticing, recording and acting early.
At Merchant Taylors' Prep, all staff are trained to identify children who may benefit from early help. Any such concern must be reported immediately to the **Designated Safeguarding Lead (DSL)** or a member of the Safeguarding Team, and recorded on **CPOMS**.
The DSL will assess the concern using the *Hertfordshire Continuum of Need for Children and Young People (2025–26)* and may take one or more of the following actions:
- Offer in-school support or interventions
- Signpost the family to appropriate external services
- Initiate an **Early Help Assessment** in partnership with the family and other professionals
- Monitor the situation through Team Around the Child (TAC) meetings or pastoral support plans

Early help can be led by the school or coordinated with other professionals as part of a multi-agency approach. Decisions and actions will be documented and reviewed regularly.

## Children Who May Particularly Benefit from Early Help
While any child may benefit from early help, school staff should be particularly alert to children who:
- Are disabled or have health conditions with additional needs
- Have special educational needs (with or without an EHCP)
- Have a mental health need
- Are young carers
- Are at risk of becoming involved in anti-social or criminal behaviour, including gangs or county lines
- Are frequently missing from education, home or care
- Have experienced multiple suspensions or are at risk of exclusion
- Are at risk of modern slavery, trafficking, sexual or criminal exploitation
- Are vulnerable to radicalisation or extremist influence
- Have a parent or carer in custody, or are affected by parental offending

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- Live in households affected by drug or alcohol misuse, adult mental health issues, or domestic abuse
- Are themselves misusing alcohol or other substances
- May be subject to so-called 'honour'-based abuse, including **FGM** or **forced marriage**
- Are living in private fostering arrangements

The presence of one or more of these indicators does not automatically trigger statutory intervention but must prompt **early recording, professional conversation and appropriate response**.

Early help sits within our whole-school commitment to acting promptly, working in partnership with families, and doing all we can to support children's welfare at the earliest stage.


### 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 without delay, to share information appropriately, and to act at all times in the best interests of the child.

Staff must remain aware that abuse can occur within or outside the school environment, within or outside the home, and online or offline. Children may be at risk in a range of contexts, and staff must maintain an attitude of *"it could happen here"* in all matters relating to safeguarding.

### Reporting Concerns

Any concern relating to a child's safety or welfare must be reported:
- **Via CPOMS** as the first point of contact
- Or **directly to the DSL or a member of the Safeguarding Team** if CPOMS is unavailable or if the matter is urgent

Staff must not attempt to investigate concerns or determine whether abuse has occurred. It is not the role of school staff to reach conclusions about abuse — their responsibility is to notice, record and report.

If a child is at immediate risk of serious harm, the school will make an urgent referral to the local authority children's services for the area where the child is resident. In some cases, the school may seek advice from the local authority before making a formal referral, particularly where early help may be appropriate.

In most cases, the school will inform parents or carers when a referral is being made to a statutory agency. However, this will not occur if doing so would put the child at further risk of harm, or if parents may be implicated in the concern. Staff must be mindful that parental consent is not required for referrals to statutory services when a safeguarding concern is raised.

### Local Authority Contacts (as of September 2025)

For ease of reference, the following are the key local authority safeguarding contacts most relevant to the school community. These details should be verified regularly via the local authority website:

| Local Authority | Contact number | Other | |
|---|---|---|---|
| Barnet MASH | 020 8359 4066 | Out of hours 020 8359 2000 | mash@barnet.gov.uk |
| Brent Family Front Door | 020 8937 4300 | Out of hours 020 8863 5250 | Online form |
| Buckinghamshire MASH | 01296 383962 | Out of hours 0800 999 7677 | secure-cypfirstresponse@buckscc.gov.uk |

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| Camden MASH | 020 7974 3317 | Out of hours 0207 278 4444 | LBCMASHadmin@camden.gov.uk |
|---|---|---|---|
| Ealing MASH | 020 8825 8000 (24h) | ecirs@ealing.gov.uk | |
| 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 Data Protection Act (2018) 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, 2025). 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
At Merchant Taylors' Prep, we understand that safeguarding children extends beyond the home. As children grow and begin to explore the wider world, they are influenced by a range of environments and relationships — including school, the local community, online platforms, and peer groups.
This approach is known as contextual safeguarding. It recognises that harm may occur not just within families, but in multiple settings, and that these contexts may be interlinked. A child at risk in one area of their life may also be vulnerable in others.
Staff at MTP are trained to be alert to signs of harm or abuse that children may experience outside the home, including in peer relationships, online activity, local spaces, or during transitions between settings. We work closely with other schools, local agencies, and community partners to understand emerging risks and to keep children safe beyond the school gates.

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All staff are expected to notice early indicators of harm and to report them promptly to the DSL using the school's established procedures. We maintain a culture of vigilance, with a strong belief that safeguarding is everyone's responsibility.

The four main categories of abuse, as outlined in *Keeping Children Safe in Education (2025)*, are listed below. Each may present in different ways, especially in younger children. Staff are trained to recognise both obvious and subtle signs, and to raise concerns even when only a single indicator is observed, recognising that, over time, these may build a fuller picture.

| Physical Abuse: | Possible Signs of Physical Abuse: |
|---|---|
| A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. | - unexplained injuries or burns<br>- improbable excuses given to explain injuries<br>- refusal to discuss injuries<br>- untreated injuries<br>- admission of excessive punishment<br>- bald patches<br>- withdrawal from physical contact<br>- arms and legs kept covered in hot weather<br>- fear of returning home or medical help<br>- self-destructive tendencies<br>- aggressive behaviour or running away |
| Emotional Abuse:<br>The persistent emotional maltreatment of a child such that it causes severe adverse effects on their emotional development. This may include:<br>• Telling a child they are worthless or unloved<br>• Limiting opportunities to express views or engage socially<br>• Imposing developmentally inappropriate expectations<br>• Witnessing or being involved in serious bullying (including cyberbullying)<br>• Exploitation or corruption of children | Possible Signs of Emotional Abuse:<br>- delays in physical, mental and emotional development<br>- admission of excessive punishment<br>- over-reaction to mistakes or fear of new situations<br>- sudden speech disorders<br>- inappropriate emotional responses<br>- neurotic behaviour (e.g. rocking, hair twisting, thumb-sucking)<br>- self-harm or self-mutilation<br>- fear of parents being contacted<br>- extremes of passivity or aggression<br>- drug/solvent abuse<br>- running away<br>- child criminal exploitation |
| Neglect:<br>The persistent failure to meet a child's basic physical and/or psychological needs. It may include:<br>• Failing to provide adequate food, clothing or shelter<br>• Failing to protect from physical/emotional harm<br>• Lack of supervision or failure to access appropriate medical care | Possible Signs of Neglect:<br>- constant hunger or tiredness<br>- poor hygiene or clothing<br>- emaciation<br>- frequent lateness or absence<br>- untreated medical problems<br>- destructive tendencies or low self esteem<br>- neurotic behaviour<br>- social withdrawal or no friendships |

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| | |
|---|---|
| • Neglect during pregnancy due to substance misuse | - running away<br>- compulsive stealing or scavenging |
| **Sexual Abuse:**<br>Involves forcing or enticing a child to take part in sexual activities. This includes:<br>• Contact abuse (e.g. assault by penetration or touching)<br>• Non-contact abuse (e.g. grooming, exposing children to sexual images, watching sexual activities)<br>• Sexual abuse facilitated or conducted online<br>• Peer-on-peer sexual abuse (see Child-on-Child Abuse section)<br><br>Also includes:<br>• Child Sexual Exploitation (CSE): where children are manipulated or coerced into sexual activity in exchange for something (e.g. money, gifts, affection)<br><br>• Female Genital Mutilation (FGM): a form of sexual and physical abuse. Any suspicion of FGM must be reported to the police and MASH immediately. | **Possible Signs of Sexual Abuse:**<br>- unexplained or inconsistently explained physical injuries<br>- repeat bruising; bruising of different colours; burn injuries<br>- reluctance to talk about injuries<br>- dramatic behaviour changes (introversion, aggression)<br>- social withdrawal or peer difficulties<br>- regression to wetting or soiling<br>- frequent urinary tract infection or medical complaints<br>- emotional overdependence on adults other than parents<br>- avoidance of PE or swimming lessons (possibly hiding injuries or fear of vulnerability when changing)<br>- self-harming<br>- attention seeking beyond norm for age<br>- age-inappropriate sexualised play language<br>- unexplained access to money or valuables<br>- fear of, or excessive attachment to parents or carers |

Staff must be alert to safeguarding risks that can affect children both within and beyond the school environment. While some behaviours may appear more common in older pupils, children aged 3–11 can still be vulnerable — particularly through family circumstances, sibling influence, peer dynamics, or online exposure.

The following may be indicators of risk and must be reported to the DSL via CPOMS:

- Drug or alcohol misuse (by the child or within the home)
- Persistent or unexplained absences from school
- Exposure to serious violence or county lines activity
- Signs of radicalisation or extremist influence
- Sharing or exposure to nude/semi-nude images, whether consensual or coerced
- Sudden changes in mood, behaviour, or engagement

Staff should not dismiss concerns based on age. Apparent minor signs may point to broader risk, and early recording and escalation are essential to keeping children safe. All staff must maintain awareness of a wide range of safeguarding issues that may place children at risk of harm. Even in a prep school setting, younger children can be affected directly or indirectly by complex factors including domestic abuse, mental health difficulties, criminal exploitation, or

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radicalisation. Staff are trained to identify these risks early, to record concerns via CPOMS, and to escalate immediately to the Safeguarding Team.

**Domestic Abuse** can be psychological, physical, sexual, financial, or emotional. It may involve a single incident or a pattern of behaviour (*Domestic Abuse Act 2021*). Children can be victims through **seeing,** hearing, or experiencing the effects of abuse in their home.

Children may also be affected by abusive or controlling behaviour in peer relationships, even in primary settings. While not legally classified as domestic abuse in younger children, these behaviours may mirror similar patterns and require safeguarding intervention.

The school recognises that witnessing or being exposed to abuse can significantly impact a child's emotional wellbeing, development, and ability to learn. All concerns must be logged and escalated via CPOMS.

### The Prevent Duty (Anti-Radicalisation and Anti-Extremism)

Staff are trained to recognise the signs that a child may be vulnerable to radicalisation. This may include exposure to extremist views or grooming through online platforms. Any concerns must be referred to the PREVENT team using the HSCP referral process.

- Contact: prevent@herts.pnn.police.uk
- Online referrals: HCSP Prevent Referral Form
- DfE Helpline: counter-extremism@education.gsi.gov.uk | 0207 340 7264

See Appendix 3 for the school's full Prevent strategy.

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

Honour-Based Abuse (HBA) includes Female Genital Mutilation (FGM) and Forced Marriage. These are serious safeguarding concerns and illegal under UK law.

- FGM is the partial or total removal of external female genitalia.
- If a teacher discovers that FGM appears to have been carried out on a girl under 18, they have a statutory duty to report it to the police.
- Contact Hertfordshire Police: 101 (local) or 01707 354000

FGM concerns may also arise through disclosures from family members and must always be taken seriously.

### Mental Health

Children's mental health and emotional wellbeing are central to safeguarding. Mental health problems may be a symptom or an indicator of abuse, neglect, or exploitation.

Staff are trained to recognise behaviours suggesting that a child may be struggling emotionally, including:

- Withdrawal or sudden changes in mood
- Disengagement from learning or play
- Self-harming behaviours or expressions of distress

Staff do not diagnose but can access support and refer children to appropriate services. If a mental health concern has a safeguarding dimension, it must be recorded on CPOMS and discussed with the DSL immediately.

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

While more prevalent in secondary settings, younger children may still be at risk through older peers, siblings, or community exposure.

Child Criminal Exploitation (CCE) involves coercing or manipulating a child into criminal activity, often in exchange for status, money, or under threat.

County Lines refers to the movement of drugs and money across areas, using children as couriers. Common methods include online grooming, violence, and coercion. Risks can include:

- Frequent absence from school

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- Unexplained gifts, money, or new possessions
- Sudden changes in friendships or behaviour
- Signs of assault, fear, or withdrawal
- Children found in unknown locations or staying in unsuitable accommodation ('trap houses')
- Bank accounts used by others
- Signs of trafficking or drug concealment (e.g. 'plugging')

Staff must escalate any concerns about CCE or county lines involvement immediately to the Safeguarding Team.

## Child-on-Child abuse

All staff should recognise that children can abuse other children, and that this may occur inside or outside school, and online. The absence of reports does not mean it is not happening; some children may be reluctant to disclose. Any concern about child-on-child abuse must be reported to the DSL via CPOMS without delay.

Staff have a responsibility to challenge and report behaviours between pupils that are abusive in nature. Dismissing harmful behaviour as "just banter," "part of growing up," or "boys being boys" risks creating a culture in which abuse becomes normalized, and children do not feel safe to speak out.

Child-on-child abuse may include, but is not limited to:
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in peer relationships (sometimes called "relationship abuse")
- Physical abuse: hitting, kicking, shaking, biting, hair-pulling, or otherwise causing physical harm — possibly with online elements
- Sexual violence: rape, assault by penetration, sexual assault (including online-facilitated threats or encouragement)
- Sexual harassment: comments, jokes, online sexual harassment, possibly as part of broader patterns
- Causing another to engage in sexual activity without consent (e.g. forcing a child to strip or touch themselves)
- Consensual and non-consensual sharing of nude or semi-nude images or videos (youth-produced sexual imagery)
- Upskirting: taking an image under a person's clothing without permission for sexual gratification, humiliation, or distress
- Initiation / hazing rituals: harassment, abuse, or humiliation used to initiate a child into a group (may include online activity)

When a child reports child-on-child abuse, staff should:
- Reassure them they are being taken seriously
- Explain what will happen next in clear, age-appropriate language
- Ensure the child feels safe and supported
- Record the disclosure factually on CPOMS and refer to the DSL
- Treat all children involved as "at risk" and support them sensitively, without judgment
- Put in place actions to reduce further risk to all parties

We recognise that child-on-child abuse can be gendered (with girls often more at risk of sexual harassment or violence), but all forms of child-on-child abuse are unacceptable and will be treated seriously, regardless of the identities of those involved.

Reporting channels for pupils include (but are not limited to):
class teachers, teaching assistants, tutors, Heads of, medical staff, sports staff or via parents.
More detail is provided in the school's Anti-Bullying Policy.

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

"Sharing nudes and semi-nudes" refers to the sending or posting of nude or semi-nude images, videos, or live streams by children under 18. This can occur via social media, messaging

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apps, gaming platforms, forums, or device-to-device methods (e.g. AirDrop). Such content may involve one or more children. Incidents may vary significantly in severity, from grooming or coercion (sextortion) to consensual peer-led exchanges. Staff must respond swiftly, guided by proportionality, with the welfare and protection of the child as the primary concern.

If an incident is disclosed or detected:
- Do not view or download the content — this is illegal
- Do not upload it to CPOMS
- Do not ask the child to delete it or handle it themselves
- Explain to the child that you must report it
- Safely confiscate the device (without looking at content) and hand it to the DSL
- Report it immediately to the DSL

The DSL will convene a small team to categorise the incident, assess risks, and decide on next steps. Parents should be informed early, unless this risks further harm. If there is any concern that a child is at risk of harm, a referral must be made immediately to Children's Social Care and/or the police.

Further guidance:
Searching, Screening and Confiscation: Advice for Schools (DfE, July 2022)
Sharing nudes and semi-nudes: advice for education settings (DfE, March 2024)

### Children Missing from Education
A pupil missing from education can be a serious indicator of abuse or neglect. The school must take all reasonable steps to ensure every pupil is accounted for and must act with vigilance when attendance becomes irregular.

#### When a pupil is removed from roll:
- Carry out checks to understand the reason (e.g. contact parents, previous settings)
- Review safeguarding records and confirm the pupil's next educational placement
- Notify the local authority in the pupil's home area, where required by law (e.g. elective home education, no forwarding school, medical unfitness, permanent exclusion)

#### When attendance is concerning:
- If a pupil accumulates ten days of unauthorised absence (excluding illness or agreed leave) or shows unexplained irregular attendance, the DSL or Deputy must consider a CME referral
- Persistent or sudden absence may signal larger safeguarding issues such as exploitation

#### On transfer to another school:
- Child protection records must be copied and transmitted securely—separate from the main file—and clearly marked as confidential
- At least two emergency contact numbers must be held for each pupil

#### If a pupil goes missing during the school day:
- Follow the school's Lost Child Procedure
- Once located, reflect on the cause of the incident
- If any safeguarding concern arises, report it immediately to the DSL
- If a child fails to arrive at school and no reason is given, office staff or registration staff must call parents that morning to verify the pupil's whereabouts

### Responding to safeguarding and child protection concerns (see Appendix 6)
All staff at Merchant Taylors' Prep are trained in how to respond if a child discloses abuse or raises a concern. It is essential to:

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- Reassure the child that they are being listened to and taken seriously, regardless of how long it has taken for them to disclose.
- Avoid minimising any abuse, whether it occurs online or outside school.
- Never give the impression the child is creating a problem by speaking up, or make them feel ashamed.

### How to Listen and Respond

When a child is making a report, staff must:

- Listen attentively and patiently, without interruption.
- Use the child's own language when reflecting back what they say.
- Be non-judgmental, setting clear boundaries and explaining how the report will be handled.
- Avoid leading questions; only use open prompts such as *"when?", "where?", "what happened?"*
- It is acceptable to ask if the child has been harmed and to describe the nature of the harm.

(See Appendix 5 for more detailed guidance on handling disclosures.)

### Recording Concerns

- The school uses CPOMS to record all safeguarding and child protection concerns.
- Staff should log any matter that raises concern about a child's welfare, including:
    - Poor attendance
    - Changes in appearance or dress
    - Unusual or withdrawn behaviour
    - Emotional or mental health issues
    - Academic deterioration
    - Conversations with parents about concerns
    - Home conditions or responses from parents
- All entries must be factual, non-judgmental, accurate, relevant, and timely.
- If CPOMS is unavailable, staff should complete a **Record of Concern Form** (see Appendix 2) and hand it to a member of the Safeguarding Team. It must then be uploaded to CPOMS as soon as possible.

### Supportive Safeguarding Culture

- The DSL and Safeguarding Team promote an open culture where staff are encouraged to raise concerns and maintain professional curiosity.
- The school supports all individuals involved in safeguarding issues, including victims, alleged perpetrators, and other children who may be affected.
- Staff are trained to understand referral thresholds:
    - **Section 47**: when a child is suffering or is likely to suffer significant harm, immediate referral to Children's Services and, if necessary, the police.
    - **Section 17**: when a child is in need of additional support, the school coordinates with Early Help or external services.

### Internal and External Support

- In-school support includes access to the School Counsellor.
- Referrals to external professionals may be made, if appropriate, following consultation with the Safeguarding Team.
- The school provides opportunities for pupil reporting via the **Student Voice app**, which enables anonymous or named disclosures.
- Posters throughout the school remind pupils how to access the app, and it is also used to conduct regular pupil safety surveys. Findings are used to inform pastoral planning and address any emerging concerns.

### Education and Prevention

- The Pastoral Curriculum includes age-appropriate teaching about:
    - Personal safety
    - Respectful relationships

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- o Online safety (also covered in Computing)
- o Knowing who to talk to and when
- **Relationship and Sex Education (RSE)** is delivered in accordance with the school's RSE Policy and government guidance.

## Logging Incidents Involving Younger Children
- For our youngest pupils (from age 3), not every minor incident of unkind behaviour is formally logged, recognising that early social learning includes boundary-testing.
- However, persistent or repeated concerns, or behaviours which indicate distress, harm or unmet needs, are recorded on CPOMS and monitored accordingly.

## Children with Special Educational Needs and/or Disabilities (SEND)

Children with special educational needs and/or disabilities (SEND), including those who are looked after, may face additional safeguarding vulnerabilities. Staff at Merchant Taylors' Prep are trained to be alert to the unique challenges these pupils may face and to respond with appropriate sensitivity and curiosity.

This policy recognises that additional barriers can exist when identifying potential abuse or neglect in children with SEND. These may include:
- **Misattributing behaviours or injuries** to a child's disability, rather than exploring the possibility of abuse or neglect.
- **Underestimating the impact of bullying** or peer-on-peer abuse, particularly when children may not show clear outward signs.
- **Communication difficulties** which may reduce a child's ability to disclose abuse or seek help.

The School is committed to ensuring that all children, including those with SEND, have access to trusted adults, appropriate communication tools, and a culture of safeguarding that is responsive to their individual needs. Staff receive regular training to help them understand the additional risks and to challenge assumptions where necessary.

## Staff Recruitment and Training

We follow strict safer recruitment procedures to ensure that all staff and volunteers are suitable to work with children. These procedures are compliant with Keeping Children Safe in Education (KCSIE) and the Independent School Standards Regulations (ISSRs).

Key elements include:
- Enhanced DBS checks for all staff prior to starting work, and additional checks (e.g. overseas police checks) where applicable.
- Maintenance of a robust Single Central Register (SCR), which is reviewed regularly and audited termly by the Safeguarding Governor.
- Section 128 checks for all internal promotions to management positions, in line with regulatory requirements.
- Safer recruitment training for senior leaders and governors involved in appointment panels.
- All staff involved in recruitment processes are familiar with the School's Safer Recruitment Policy.

For external providers and partner organisations, the school ensures that appropriate safeguarding checks have been carried out for any adults working with our pupils off-site.

All unescorted volunteers who work regularly with pupils undergo the same safeguarding vetting processes, including enhanced DBS checks, reference checks, and appropriate induction.

Regular safeguarding and child protection training is mandatory for all staff, and includes:
- Annual safeguarding refresher training
- Induction training for all new staff

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- Specific training for DSLs and the wider Safeguarding Team
- Regular updates on safeguarding issues, KCSIE changes, and local procedures

This ensures that all adults working in or on behalf of the school are confident in identifying risks, recognising signs of abuse, and responding in accordance with school procedures.

### Induction of Staff and Governors
Merchant Taylors' Prep is committed to ensuring that all staff and governors receive clear, timely, and comprehensive safeguarding induction, equipping them to recognise and respond to concerns from the outset of their role.

### Staff Induction
All new staff (teaching, support, temporary, and volunteers) are required to complete safeguarding induction training as a priority upon joining the School, and ideally before taking up post. This training is led by the **Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL)** and ensures that every adult is confident in their responsibilities and knows how to respond to a concern.

As part of their induction, staff receive copies of the following:
- The **School's Safeguarding Policy**
- The **Safeguarding Code of Conduct**
- **KCSIE Part One**, including **Annex B: Further Information**

The induction covers the following key areas:
1. Identity and role of the DSL and Safeguarding Team members
2. Receipt of all core safeguarding documents listed above
3. How to access additional safeguarding policies and procedures
4. Understanding and identifying safeguarding and child protection concerns
5. How to report concerns using CPOMS and/or the Record of Concern Form
6. Specific safeguarding issues (including Prevent, FGM, and child-on-child abuse)
7. How to handle a disclosure from a child
8. Procedures for responding to allegations against adults in the School
9. Full review of the Safeguarding Code of Conduct

Staff sign to confirm receipt and understanding of this training; these records are retained securely in the DSL's office.

### Teaching Staff
All teaching staff also receive a copy of the Staff Code of Conduct (School Employment Manual, with digital access to relevant school policies, including those directly related to safeguarding and pupil wellbeing.

### Governor Induction
New Governors receive safeguarding induction training during their initial Governor Visit Day. This mirrors the staff induction content and ensures that Governors understand their statutory responsibilities in overseeing safeguarding practice. Governors are also encouraged to complete regular online safeguarding training to maintain up-to-date knowledge of current expectations and best practice.

### Regular Training
The School ensures all staff receive regular and up-to-date safeguarding training, guidance, and oversight. Key practices include:
- All staff receive annual refresher training, delivered via INSET days or staff meetings.
- Teaching staff must complete online safeguarding training (e.g. via Educare) at least once per year.

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- Updates from external agencies, the Hertfordshire Safeguarding Children Partnership (HSCP), and relevant local or national guidance inform ongoing staff training and the scheduling of further sessions.
- All staff sign to confirm they have received training, understood its content, and that it covers at least the elements in the induction programme.
- If staff are absent from scheduled training, they will receive copies of the materials and have the opportunity to discuss the content with senior staff before signing off their completed understanding.

### DSL / Safeguarding Team Training
- Members of the Safeguarding Team, including the DSL, engage in specialist DSL training at least once every two years.
- Many DSLs and deputies also participate in additional safeguarding training more frequently than biennially.

### Records and Evidence
- Evidence of required pre-employment checks, such as qualification records or safeguarding training certificates, is retained in individual personnel files.
- The Single Central Record (SCR) confirms that all required checks have been completed, though it does not hold copies of certificates.

### Specialist and External Training
- To maintain awareness of emerging safeguarding risks, the School draws on external training providers and expert organisations (e.g. NSPCC, TES) for up-to-date guidance and support.
- Staff are encouraged to consult authoritative sources (for example GOV.UK) for further information on safeguarding topics relevant to their work.

### Training Topics
Staff training and updates cover topics including, but not limited to:
- Abuse (including domestic abuse, relationship abuse, faith-based abuse)
- Bullying and cyberbullying, including child-on-child abuse
- Children and the courts (e.g. witness in criminal proceedings)
- Children missing from education, home or care
- Children with family members in prison
- Child abduction, community safety incidents
- Child exploitation (e.g. criminal exploitation, trafficking, CSE)
- Cybercrime
- Drugs
- Honour-Based Violence (e.g. FGM, Forced Marriage)
- Health, wellbeing, and medical conditions, including fabricated or induced illness and mental health
- Vulnerabilities in specific groups (e.g. girls, children with SEND, LGBT children)
- Homelessness
- Modern slavery and the National Referral Mechanism
- Online safety, including sharing of youth-produced sexual imagery
- Private fostering
- Radicalisation and the Prevent duty
- Violence, including gangs and youth violence
- Sexual violence and harassment between children & violence against women and girls

### Governance Training
- **The Safeguarding Governor receives specialist training from external providers at least once every two years.**
- All governors are encouraged to complete safeguarding training (e.g. via Educare), or provide evidence of equivalent training completed elsewhere.

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## Internet Safety and Online Teaching

Online safeguarding is vital even for younger children, because risks can emerge in many forms. We classify these into four broad categories:

- **Content**: exposure to harmful material (e.g. inappropriate images, misinformation, extremist views)
- **Contact**: harmful interaction with others online (e.g. grooming, peer pressure)
- **Conduct**: risky behaviour by pupils themselves (e.g. sharing inappropriate images, cyberbullying)
- **Commerce**: online fraud, phishing, or inappropriate advertising aimed at children

## Safeguarding Measures in School

- The School employs robust **filtering and monitoring systems**. The DSL works with the Safeguarding Team to ensure these systems meet DfE standards and suit the needs of younger users; these are audited annually.
- All staff receive regular training on their responsibilities for filtering, monitoring, and responding to online risks.
- Pupils are **not permitted** to use their own networked mobile devices during school time without expressed staff permission and supervision.
- School devices (e.g. tablets, laptops) are monitored during school hours. Any suspicious or harmful usage triggers safeguarding procedures.
- Pupils learn to recognise unsafe or inappropriate online behaviour and how to report it and who to

## Education & Prevention

- Internet safety is taught in PSHE, ICT and other relevant parts of the curriculum, tailored for different age groups.
- Pupils are taught how to adjust behaviour online (for example, privacy settings, safe search, respectful communication) and how to build resilience against harmful content or contact.
- Staff and pupils follow the IT Acceptable Use Policy and E-Safety Policy, which detail safe practice, filtering, monitoring, and device use.
- The School recognises the increasing presence of generative AI technologies and the importance of understanding their potential risks and benefits, even for younger children. While generative AI is not currently a routine part of pupil learning at Merchant Taylors' Prep, the School is monitoring national guidance and best practice in this area. Any use of such technology will prioritise pupil safety and will be overseen by the Safeguarding Team in line with DfE expectations.

## Online/Remote Teaching Safeguards

If remote teaching or pupil support is necessary:

- Use school-approved platforms that include security, monitoring, and safeguarding features
- Ensure a safe environment (e.g. background checks for remote tutors, parental awareness)
- Set clear expectations about behaviour, privacy, and usage rules
- Record sessions where appropriate (with consent) and maintain logs
- Be especially vigilant to signs of distress, unusual behaviour, or hidden risk during remote interaction

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 and college

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. We understand that children aged 3–11 are increasingly engaging

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Email: office@mtpn.org.uk

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with the online world, through home learning, games, and digital communication - often with limited supervision. It is essential that all staff remain alert to potential safeguarding concerns arising during remote interactions, and that they respond with the same level of vigilance as they would within school. All concerns must be reported to the DSL via CPOMS, and where necessary, referrals will be made to Children's Services or the police, in line with safeguarding procedures. Online lessons and communications must uphold the same high standards of professionalism, safeguarding and care that are expected in all face-to-face teaching.

The School will ensure that any digital learning platforms and tools used are compliant with privacy, data protection and GDPR standards. Online learning is delivered in accordance with our wider Safeguarding Policy, the Staff Code of Conduct, and the Acceptable Use Policy.

### Code of Conduct for delivering virtual lessons

When staff deliver online lessons or pastoral sessions remotely, the following guidance applies:
- Only school-approved platforms should be used (e.g. Microsoft Teams) and personal accounts must never be used.
- Staff must ensure that any online interaction is scheduled and visible to colleagues, with Heads of Department or SLT able to join sessions if required.
- Staff and pupils must conduct sessions in appropriate environments, bedrooms must not be visible, and care should be taken to remove personal or inappropriate items from view.
- Staff must follow the School's Acceptable Use Policy at all times, including guidance on appropriate communication, data protection, and the recording or sharing of images.
- Staff must take care not to initiate or continue livestreams unintentionally.
- For pupils in the younger age ranges, sessions should involve a parent or carer nearby wherever possible, to support engagement and safeguarding.
- Sessions should be timetabled and appropriate to the age and attention span of the pupils involved.

### Whistle Blowing

All staff and volunteers should feel confident in raising concerns about poor or unsafe practice, including potential failures in the School's safeguarding processes. The School is committed to ensuring that such concerns are treated seriously and handled appropriately by the Senior Leadership Team. To support this, staff should be aware of the School's Whistleblowing Policy.

Given the age of our pupils, many safeguarding disclosures will rely on adult vigilance. Staff and volunteers are therefore actively encouraged to report concerns, however small they may seem.

Where a staff member feels unable to raise an issue within 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 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

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

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The following procedure applies when a member of staff has:

(a)     behaved in a way that has harmed a child, or may have harmed a child;
(b)     possibly committed a criminal offence against or related to a child;
(c)     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 and advice and will preside over the investigation of the allegation; weight will be given to the views of the LADO (or designated

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Email: office@mtpn.org.uk

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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

The culture at Merchant Taylors' Prep encourages openness, transparency and professional curiosity. This includes a proactive approach to identifying and addressing **low-level concerns,** those which do not meet the threshold for harm but may still indicate a need for reflection, support or intervention.

According to *Keeping Children Safe in Education* (KCSIE), a **low-level concern** is any concern — no matter how small, and even if based on a sense of unease or a 'nagging doubt' — that an adult working in or on behalf of the School may have acted in a way that:
- is inconsistent with the staff code of conduct (including inappropriate conduct outside of work); and
- does not meet the allegations threshold or is not considered serious enough to refer to the LADO.

Examples of such behaviour could include, but are not limited to:
- being overly friendly with children;
- showing favouritism;
- taking photographs of children on a personal mobile device;
- spending excessive time with a child one-on-one, particularly in private or secluded spaces; or
- using sexualised, intimidating or inappropriate language.

Such behaviours may arise from thoughtlessness, misjudgment, or a lack of awareness, but could also be a signal of something more concerning. Addressing low-level concerns helps to uphold the professional boundaries that protect both children and staff.

Any member of staff who has a low-level concern about a colleague—whether permanent, temporary, or a volunteer—should report this to the DSL, Deputy DSL or the Head. This includes concerns about supply staff and contractors.

The Head (or DSL/Deputy DSL, if delegated) will:

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- Speak to the person raising the concern
- Speak to the individual the concern relates to
- Make a determination on appropriate next steps, based on context and risk

All low-level concerns will be recorded in a secure and confidential section of the staff member's HR file. These records will be reviewed periodically to identify any patterns of behaviour or emerging risk. Staff will not be penalised for raising a low-level concern in good faith.

Raising concerns early helps prevent potential harm and promotes a safe, respectful environment where safeguarding is truly everyone's responsibility.

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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 or college the DSL should ensure their child protection file is transferred to the new school or college 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;
- Receive, 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 annually that all staff (or volunteers) who work directly with children:
- Complete an online Level 1 Safeguarding Course;
- Receive, 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 Sex and Relationships Education (SRE).

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- Working with the Head of PSHE, the IT support department and the Deputy Head (Information Systems) 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 Missing Pupil 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 Pupil Information 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 MTS and 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.

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## Appendix 2: Safeguarding Referral 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 to the DSL or DDSL.*

| | |
|---|---|
| **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**

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## Appendix 3: Prevent Duty

### Policy on preventing extremism and radicalisation

### Principles

Merchant Taylors' School 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 2025 (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, March 2024

### 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' School. 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 and Discipline Policy for pupils and the Safeguarding Code of Conduct for staff.

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

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- 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 identitu, 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' School 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' School 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

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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' School (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.

DSL
September 2025


## 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

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Email: office@mtpn.org.uk
mtpn.org.uk
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WD3 1LW

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?

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- 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**

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Email: office@mtpn.org.uk

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## Appendix 4: Safeguarding Code of Conduct

**(See also the Merchant Taylors' School 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

### 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

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email address. Staff should report any concerns about inappropriate contact from pupils to the Safeguarding Team immediately.

- Staff supporting former pupils, for instance those reapplying to university, 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 telephone 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' School Employment Manual and the MTS Acceptable Use Policy.
- Parents and visitors are prohibited from using mobile phones or smartwatches in EYFS settings. Any necessary phone calls must be taken outside of the EYFS area.

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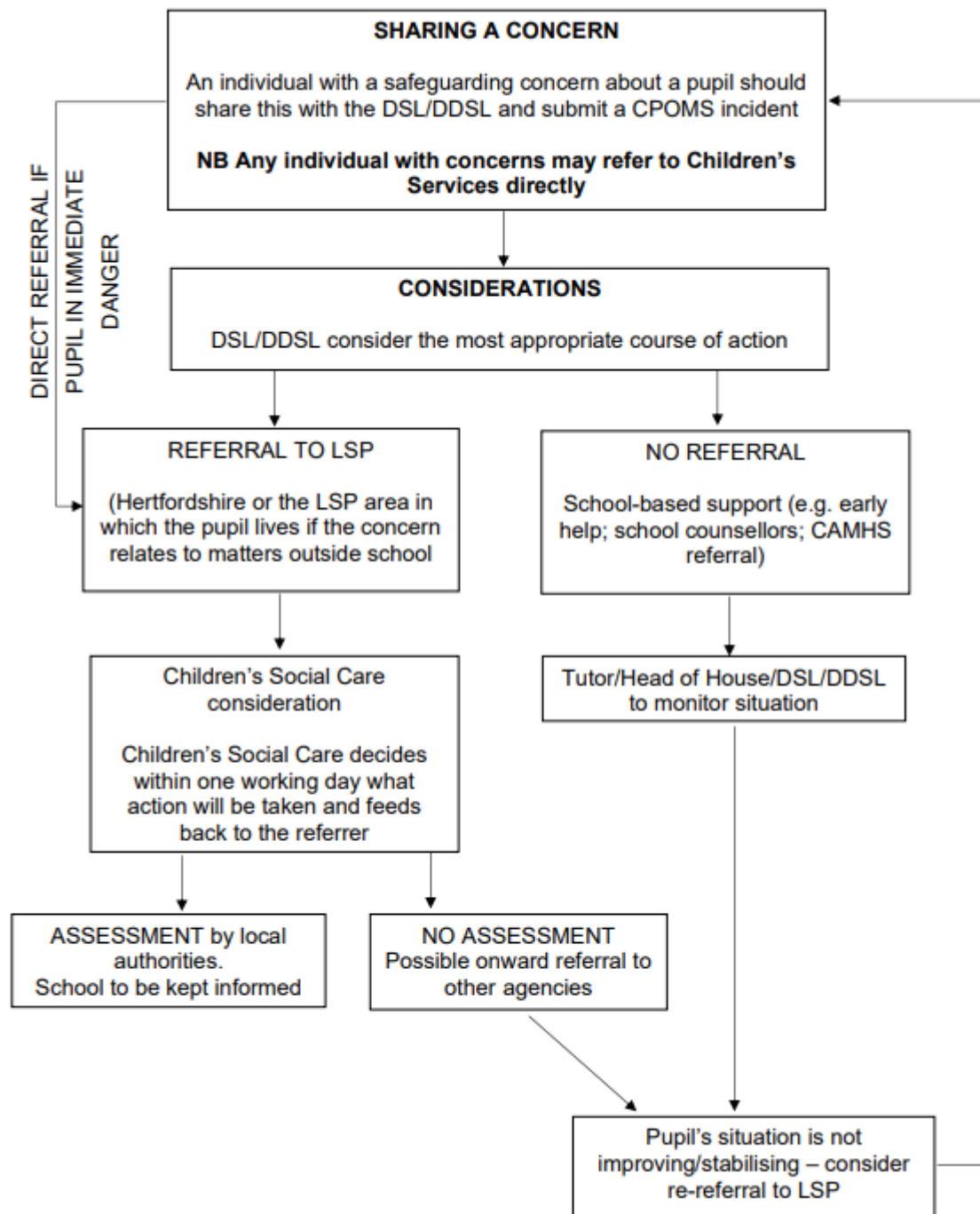## Appendix 5: Practical Advice When Dealing with Disclosures of Abuse

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.

DSL
September 2025
Review Date: September 2026

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Email: office@mtpn.org.uk

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WD3 1LW

## Appendix 6: Safeguarding Concern Flowchart

**DIRECT REFERRAL IF PUPIL IN IMMEDIATE DANGER**

**SHARING A CONCERN**

An individual with a safeguarding concern about a pupil should share this with the DSL/DDSL and submit a CPOMS incident

**NB Any individual with concerns may refer to Children's Services directly**

↓

**CONSIDERATIONS**

DSL/DDSL consider the most appropriate course of action

↓

**REFERRAL TO LSP**

(Hertfordshire or the LSP area in which the pupil lives if the concern relates to matters outside school

**NO REFERRAL**

School-based support (e.g. early help; school counsellors; CAMHS referral)

↓

Children's Social Care consideration

Children's Social Care decides within one working day what action will be taken and feeds back to the referrer

Tutor/Head of House/DSL/DDSL to monitor situation

↓

ASSESSMENT by local authorities.
School to be kept informed

NO ASSESSMENT
Possible onward referral to other agencies

Pupil's situation is not improving/stabilising – consider re-referral to LSP

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**Appendix 7: Early Years Safeguarding from 1 September 2025**

This supplements the School's Safeguarding & Child Protection Policy and applies specifically to children in the Early Years Foundation Stage (EYFS), including our Nursery and Reception pupils. It reflects the strengthened requirements introduced from 1 September 2025.

1. Safer Recruitment in Early Years
In addition to the School's Safer Recruitment Policy:
- References: At least two references will be obtained before appointment is confirmed. These will be followed up directly with the referees to verify authenticity.
- Suitability: Recruitment procedures will include safeguarding-specific questions and checks to ensure only suitable individuals are employed in early years provision.
- Single Central Record: All EYFS staff are included on the SCR in line with statutory requirements.

2. Attendance and Emergency Contact Details
- If an EYFS child is absent without explanation, staff will follow up with parents/carers on the first day of absence.
- For prolonged or repeated absence, the DSL will investigate, record actions, and notify the Local Authority where necessary.
- The School will hold at least two emergency contact details for each EYFS child wherever possible.

3. Safer Eating and Nutrition
- Staff will supervise meals and snack times to reduce risks such as choking.
- The School takes into account the DfE's Early Years Nutrition Guidance (2025) in its provision of meals and snacks for EYFS children. Menus are planned to support healthy development, dietary needs and allergy management, and staff supervise eating to promote safer eating practices. This will inform menu planning and food provision, unless there is a valid reason not to follow it.
- Parents will be consulted about dietary requirements, allergies, and preferences, and records kept up to date.

4. Safeguarding Training for Early Years Staff
- All EYFS staff will complete safeguarding training in line with the School's Safeguarding Policy.
- In addition, the School follows the new DfE Safeguarding Training Criteria (2025), ensuring that:
  - training is practical, contextualised, and includes how staff apply learning in practice,
  - refresher training is provided at least annually,
  - DSLs in EYFS undertake EYFS-specific safeguarding training.
- The School will keep clear records of EYFS safeguarding training.

5. Paediatric First Aid (PFA)
- All EYFS staff counted in ratio must hold a full and valid PFA certificate.
- Early years students or trainees can only be included in ratios at the level below their study if they have successfully completed PFA training.

6. Whistleblowing in EYFS
- Staff are reminded of their duty to raise concerns where safeguarding practices in EYFS may be unsafe.

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Email: office@mtpn.org.uk

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WD3 1LW

- Staff understand that they can escalate safeguarding concerns either internally to the Designated Safeguarding Lead or the Head. They are also aware of the school's Whistleblowing Policy and that they can raise concerns externally, including via the NSPCC Whistleblowing Helpline on 0800 028 0285, if they feel their concerns are not being addressed appropriately.

7. Intimate Care
- Children's privacy and dignity will be respected during changing and toileting, while balancing safeguarding considerations.
- Procedures include:
  - changing in designated areas,
  - ensuring staff are visible and/or accessible to colleagues when undertaking intimate care,
  - recording changes where necessary,
  - training staff to recognise safeguarding concerns that may arise during intimate care.

8. Other Early Years Safeguarding Requirements
- Experience-Based Route (EBR): Staff who qualify through the EBR and meet other requirements may be counted in ratios at Level 3.
- While the Reception Baseline Assessment (RBA) is statutory for maintained schools, our setting is exempt from this requirement. However, we remain committed to robust, age-appropriate assessment and tracking of pupils' progress in Reception, consistent with best practice and the EYFS learning and development requirements.
- Policy Review: This annex will be reviewed annually alongside the Safeguarding & Child Protection Policy, or sooner if DfE requirements change.

This appendix must be read alongside:
- Safeguarding & Child Protection Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Whistleblowing Policy
- EYFS Statutory Framework

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