



# ST MARGARET'S PREP

## CALNE

### **Safeguarding & Child Protection Policy**

**'The best interests of the child must be a top priority in all decisions and actions that affect children'**

**This is a whole school policy and includes the EYFS**

This document is a statement of the aims, principles and strategies for Safeguarding & Child Protection at St Margaret's Preparatory School. It was developed through a process of consultation and should be read in conjunction with the Code of Conduct for Staff, the Behaviour & Discipline, Teaching & Learning, Anti-Bullying, e-Safety, Equal Opportunities, Whistleblowing, SEND, Safer Recruitment, Intimate Care, Use of Electronic Devices and Health & Safety policies, as well as 'Keeping Children Safe in Education' (Sept 2023)

St Margaret's fully recognises its responsibilities for Safeguarding & Child Protection. We are committed to safeguarding and promoting the welfare of our pupils, regardless of age, ability, culture, religion, sexuality or class. Our policy takes full regard of 'Keeping Children Safe in Education 2023' and 'Working Together to Safeguard Children 2018' and the procedures of Wiltshire Children's Safeguarding Board.

The Designated Safeguarding Lead (DSL) is **Mrs Juliette Heal**, Deputy Head Pastoral.  
The Deputy DSLs are **Mr Luke Bromwich, Mrs Hilary Gibbin and Mr Alex Hopkins**.  
Our Nominated Governor is **Mrs Tricia Pearce**.

The Designated Teacher for Looked After Children is **Mrs Juliette Heal**.

*(The key safeguarding responsibilities for each of the roles above are set out in Keeping Children Safe in Education Sept 2023)*

**Children's Social Care referrals:**

**Early Help Single Point of Entry:** 01225 718230

Multi-Agency Safeguarding Hub (MASH): 0300 456 0108

Out of hours: 0845 6070 888

**Aim of the policy**

call the police on 999.

•To

**Wiltshire Designated Officer for Allegations (DOFA):** 01225 713945

ensure all our pupils are safe and protected from harm.

- To integrate safeguarding within the curriculum, showing continuity and progression, to allow children to develop the skills they need to recognise and stay safe from abuse (including online abuse).
- To raise the awareness of the whole school community (including staff, governors, volunteers and contractors) of the importance of Safeguarding and Child Protection and of their responsibilities for identifying and reporting actual or suspected abuse.
- To take account of and inform policy in related areas such as discipline, anti-bullying and e-safety.

The three main elements to this policy are:

**Prevention:** Establish and maintain a positive and safe environment where children feel secure, are encouraged to talk, and are listened to, where there is accessible pastoral care, careful and vigilant teaching and good adult role models.

**Protection:** Agreed procedures are followed; staff are trained and supported to respond appropriately and sensitively to any safeguarding concerns.

**Support:** For pupils who may have been at risk of significant harm, for staff and the way they respond to concerns and for any subsequent work that may be required.

**What is safeguarding?**

Safeguarding and promoting pupil welfare is 'everyone's responsibility' and is defined as: ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes; protecting children from maltreatment; preventing impairment of children's health or development.

**Child** refers to all children on our school roll and any child under the age of 18 who comes into contact with our school. This includes unborn babies.

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe that includes pupil

health and safety; school behaviour and anti-bullying; supporting pupils with medical conditions; PSHE&RSE; providing 1<sup>st</sup> Aid and site security.

St Margaret's aims to help protect the children in its care by working consistently and appropriately with all relevant agencies in order to reduce risk and promote the welfare of children.

With regard to safeguarding, St Margaret's staff are advised to maintain an attitude of **'it could happen here'**. When concerned about the welfare of a child, staff members must always act in the paramount interest of the child.

Child Protection is a part of safeguarding and promoting welfare and refers to the activity which is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Such harm can be physical, emotional, sexual or through neglect. Additionally, the school is always alert to other forms of harm that may adversely affect children. These include, for example, Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Child on child abuse, serious violence, Preventing Radicalisation, Mental Health and Children Missing Education. This is not an exhaustive list and staff are required to be alert to all issues affecting the welfare of children in consultation with the DSLs.

**Any safeguarding concerns or disclosures of abuse relating to a child at school or outside of school hours are within the scope of this policy.**

### Expectations

All staff are:

- familiar with this safeguarding policy and have an opportunity to contribute to its review.
- alert to the signs and symptoms of possible abuse.
- able to record and report concerns as set out in this policy.
- able to deal with a disclosure of abuse from a pupil.
- involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

In addition, all staff have read and understood Part 1 of the latest version of Keeping Children Safe in Education (KCSiE 2023).

### Governors

As key strategic decision makers and vision setters for the school, the governors will make sure that our policies and procedures are in line with national and local safeguarding requirements. Governors will work with senior leaders to make sure that the following essentials are in place:

Training/Teaching	Policy/Procedures	Staffing
D/DSL training KSCiE Part 1 Looked After Children Online safety for pupils Online safety for staff Preventing Radicalisation Staff Code of Conduct Staff Training Whistleblowing	Child voice Children missing out on education and Children Missing Education Concerns about Staff Conduct Dealing with a child at immediate risk Early help Female Genital Mutilation Honour based violence Child on child abuse Reporting abuse/WSCB procedures SEND and safeguarding Staff contribution to policy Safeguarding policy review	DSL DDSL Designated LAC teacher (even if there are no LAC on roll)

**Allegations management** – our Chairman of Governors is responsible for liaising with the local authority Designated Officer for Allegations (DOFA) and other partner agencies in the event of an allegation of abuse being made against the Headmaster.

**Audit** – the nominated governor for safeguarding liaises with the Headmaster and the D/DSL to complete an annual safeguarding audit return to the local authority.

**Safer Recruitment** – our governors monitor the school’s safer recruitment practice.

## Mandatory Procedure

### Safer Recruitment

- In line with KCSiE 2023, St Margaret’s follows safer recruitment practices: enhanced DBS check with barred list information, identity checks, verification of the candidate’s mental and physical fitness, qualifications, employment references, DBS details, Disqualification by Association, right to work in the UK and Prohibition for teaching and/or leadership and management.
- All checks are accurately recorded on a single central record and no member of staff or volunteer will be permitted to work in regulated activity without all the checks being made and cleared.
- Key members of staff undertake safer recruitment training. Recruitment, selection and appointment processes always include at least one of these key members of staff.

- In line with KCSiE and WSCB guidance, Volunteers and Governors undergo appropriate checks including DBS check, Disqualification by Association, references, informal interview, induction and child protection training.

### **Staff Code of Conduct**

St Margaret's is committed to positive academic, social and economic outcomes for our pupils underpinned by a strong safeguarding ethos. We are equally committed to the protection and welfare of our staff, who are expected and encouraged to work in an open and transparent way and adhere to the highest standards of professional behaviour.

The Staff Code of Conduct sets out staff behaviours that should be avoided as well as those that constitute safe practice, and supports our commitment to safeguarding children. Further guidance on good practice is set out in our ICT Staff Acceptable Use policy. This includes the use of mobile phones and smart watches.

Teaching staff are additionally expected to act within the guidance of the 'personal and professional conduct' of the Teachers' Standards.

### **Welcoming other visitors and professionals**

All visitors sign in and out, wear a school ID badge for the duration of the visit and read information outlining our safeguarding procedures. Volunteers in regulated activity who have undergone full recruitment checks are identified by ID badges on a green lanyard.

In respect of visiting speakers to the school, staff carry out rigorous checks to determine suitability and ensure that they are never left unaccompanied whilst on St Margaret's premises. Such checks would include contact with previous service users, DBS if appropriate, checking of websites & social media.

Scheduled visitors in a professional role, such as the school nurse, social worker, educational psychologist or members of the Police will have had the appropriate vetting checks undertaken by their own organisation. Any professionals visiting the school should provide evidence of their professional role and employment details (an identity badge for example).

If the visit is unscheduled and the visitor is unknown to the school, we will contact the relevant organisation to verify the individual's identity, if necessary.

### **Curriculum**

Our pupils access a broad and balanced curriculum that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.

We provide opportunities for pupils to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. The PSHEE curriculum specifically includes the following objectives:

- Developing pupil self-esteem and communication skills
- Developing strategies for self-protection including online safety (also within the Computing curriculum)
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)

Pupils participate in NSPCC 'Speak Out Stay Safe' and external online safety workshops on alternate years.

All pupils at St Margaret's know that they can talk to any member of staff at any time. This information is on the school's EASY (Enjoyment At School – Yes!) card. Large copies of the card are displayed in all teaching spaces and Pre-Prep classrooms, whilst the older children have an individual card which they keep in a visible position in their desks.

### **Early Help**

At St Margaret's, all staff can identify children who may benefit from early help as a problem emerges and discuss this with the D/DSL.

The D/DSL uses:

- The guidance on the Wiltshire Pathways website and the Digital Assessment and Referral Tool as appropriate as part of a holistic assessment of the child's needs.
- The Multi-Agency Thresholds for Safeguarding Children on the WSCB website about the suitable action to take when a pupil has been identified as making inadequate progress or having an unmet need.

**Early Help Single Point of Entry: 01225 718230**

The D/DSL will also consider the following:

- Provide early help services e.g. school nurse, pastoral worker, Head of Learning Support, family outreach worker, targeted youth, breakfast club.
- Refer to appropriate services e.g. CAMHS etc.

### **Identifying the signs**

All adults who work with or volunteer at St Margaret's should be able to identify and act on concerns about child abuse or any form of harm affecting the welfare of a child at the school. It is an important part of our pastoral responsibility to be aware of the possibility that children can be subjected to abuse, either at home or at school, from adults or from other children and follow school procedures to act upon any concerns.

All staff know how to recognise, and are alert to the signs of neglect and abuse. Definitions of abuse, set out in 'What to do if you're worried a child is being abused – Advice for Practitioners' (2015) and 'Keeping Children Safe in Education' (2023) along with notes from safeguarding training, are important reference documents for all staff. (*see also Appendix 2*)

Every staff member of staff working with children is required to read Part 1 of KCSiE 23.

St Margaret's is committed to working in partnership with parents/carers and in most situations it may be appropriate to discuss initial concerns with them or seek consent to share information.

We encourage parents to disclose any child protection or safeguarding concerns they may have.

### **Responding to concerns/disclosures of abuse**

Staff adhere to the following Dos and Don'ts when concerned about abuse or when responding to a disclosure of abuse.

#### **Do:**

- **create a safe environment** by offering the child a private and safe place if possible.
- **stay calm** and reassure the child, and stress that he/she is not to blame.
- **tell** the child that they were right to tell you and that you know how difficult it must have been to confide in you.
- **listen carefully** and **tell** the child that you believe them and are taking what is being said seriously, and that you have to speak to someone who can help to keep them safe.
- keep questions to a minimum. Encourage the child to use their own words; questioning should only include TED questions:
  - **Tell me**
  - **Explain**
  - **Describe**
  - And/or use the mirroring technique:
  - i.e. 'My dad hit me last night' respond by 'Your dad hit you last night?'
- **tell only the Designated or Deputy Safeguarding lead.**
- **record** in detail using the iSAMs well-being module, using the child's own words where possible, what you heard or what you saw.
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#### **Do not:**

- take photographs of any injuries.
- postpone or delay the opportunity for the child to talk.
- take notes while the pupil is speaking or record the conversation on any device.

- ask the child to write down what they said or repeat it to another adult.
- promise confidentiality eg say you will keep 'the secret'.
- investigate the allegation yourself.
- approach or inform the alleged abuser.

*(See Appendix 2)*

It is the responsibility of each adult in the school to ensure that the D/DSL receives the record of concern without delay. The DSL is responsible for ensuring that concerns and discussions are written up properly and acted on appropriately, which may include seeking advice with the duty social worker/MASH and/or referral. All records relating to pupil protection will be maintained in separate confidential files.

**If you believe the child is at immediate risk of significant harm or injury all staff members have a duty to act either through the DSL(s) or in their absence directly to the MASH and/or the police.**

During term time, the DSL and/or a Deputy DSL should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. We also provide 'on call' support for staff running our holiday club.

The voice of the child is central to our safeguarding practice and pupils are encouraged to express and have their views given due weight in all matters affecting them.

### **Missing children and children missing education**

Staff report immediately to the D/DSL, if they know of any child who may be:

- missing – whereabouts unknown or
- missing education – (compulsory school age (5-16) with no school place and not electively home educated).

Children who do not attend school regularly can be at increased risk of abuse and neglect. Where there is unauthorised/unexplained absence and after reasonable attempts have been made to contact the family, the DSL follows the WSCB procedure and refer to the MASH team as appropriate.

If a looked after child or a child subject to a Child protection Plan goes missing, we will refer them to the MASH within 48 hours. The designated teacher for LAC discusses any unauthorised/unexplained absence of looked after children with Virtual School when required.

St Margaret's will also refer to the MASH team any child being withdrawn from school with the intent to be electively home educated where there are safeguarding concerns.

Where there are no known welfare concerns about a pupil, we follow our procedures for **unauthorised absence** and report concerns to the Education Welfare Service.

- has 10 days or more continuous absence from school without an explanation
- has left school suddenly and the destination is unknown
- has not taken up an allocated school place as expected.



## **Children with SEND (SEND Service: 01225 757985)**

St Margaret's recognises that for a variety of reasons, children with additional needs face an increased risk of abuse and neglect; therefore staff take extra care to interpret correctly apparent signs of abuse or neglect.

Staff understand that that additional challenges can exist when recognising abuse and neglect in pupils with SEND.

- We never assume that behaviour, mood or injury relates to the pupil's additional needs without further exploration.
- Communication barriers and difficulties overcoming these barriers may be a factor.
- Children with SEND are also at a higher risk of peer group isolation and can be disproportionately affected by bullying.

At St Margaret's we aim through our environment and ethos to provide all pupils with the confidence and ability to discuss their concerns. The D/DSL works with the SENCO to identify pupils with additional communication needs and wherever possible, pupils will be given the chance to express themselves to a member of staff with appropriate communication skills.

Indications of abuse will be reported as for other pupils.

### **Off-site Visits**

Appropriate risk assessments must be in place prior to any off-site visit taking place.

Any overnight visit will explicitly set out sleeping arrangements; the role and responsibility of each adult; on/off duty arrangements; clear expectations about boundaries and interactions with children/young people; and expectations around smoking/drinking by adult.

Safeguarding concerns or allegations will be responded to following the school's procedures. The member of staff will report any safeguarding concerns to the D/DSL, who will make a referral to the MASH or DOFA if appropriate. In an emergency the member of staff in charge will contact the police and/or the MASH.

### **Record Keeping and Information Sharing**

St Margaret's will:

- keep clear written records of all child welfare and child protection concerns using the iSAMs wellbeing module recording, including a body map as appropriate (*see Appendix 1*).
- ensure all child welfare and child protection records are kept securely, and in a locked location. The record must be signed and dated and kept securely in a file under the child's

name (not family files), separate from any other school records. The DSL is responsible for ensuring that concerns and discussions are written up properly and acted on appropriately.

- ensure the records incorporate the wishes and views of the pupil.
- review concern forms regularly (by the DSL) so that concerning patterns of behaviour can be spotted.
- ensure that all child protection records relating to a child who moves to another school are passed on to the new school securely, promptly and separate from the main pupil file, with a copy being kept in this school. Confirmation of receipt should be obtained. Child welfare records below the child protection threshold but with continuing relevance to the child's wellbeing should also be transferred with parental consent.

The D/DSL acts in accordance with 'Information Sharing' - DfE (2015). Information concerning pupils at risk of harm will be shared with members of staff on a 'need to know' basis. The D/DSL makes a judgement in each individual case about who needs and has a right to access particular information.

St Margaret's is committed to working in partnership with parents/carers and in most situations we will discuss initial concerns with them. However, the D/DSL will not share information if doing so would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

When we become aware that a pupil is being privately fostered, we remind the parent/carer of their legal duty to notify Wiltshire Children's Social Care. We follow this up by contacting Children's Social Care directly.

We encourage parents to disclose any child protection or safeguarding concerns they may have. This policy is held on the school website and informs parents about the responsibility placed on the school and staff for child protection.

### **Escalation Policy**

Effective working together depends on an open approach and honest relationship between colleagues and between agencies.

Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for re-consideration if they believe a decision

to act/not act in response to a concern raised about a child is wrong. In such cases the WSCB Case Resolution Protocol and escalation policy is used if necessary.

If we are on the receiving end of a professional challenge, we see this as an opportunity to reflect on our own decision making.

### **Whistleblowing**

All staff can raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. Our whistleblowing procedures, which are reflected in staff training and our Code of Conduct, are in place for such concerns to be raised with the Headmaster, Deputy Head Pastoral or the Bursar.

Where staff feel unable to raise an issue with the members of the SLT named above or feel that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- Raise the concern in confidence with the Governors.
- Use the NSPCC whistleblowing helpline.
  - Tel: 0800 028 0285 (8.00am – 8.00pm Mon to Fri)
  - email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **Managing Allegations against Adults**

St Margaret's follows the procedure set out by the WSCB 'Allegations against adults' flowchart and includes low level concerns as set out in the staff code of conduct

Concerns about the behaviour of an adult who works or volunteers at the school must be reported to the Headmaster who will refer immediately to the Wiltshire Designated Officer for Allegations

**tel: 01225 713945/out of hours 0845 6070888**

Concerns about the Headmaster will be reported to the Chairman of Governors without informing the Headmaster.

All staff must remember that the welfare of a child is paramount and must not delay raising concerns by a worry that a report could jeopardise their colleague's career.

Any allegation of abuse will be dealt with 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.

St Margaret's **will not** undertake its own investigation of the allegation without prior consultation with the DOFA or where an offence is alleged the police.

**Inspiring Excellence**

If any person leaves St Margaret's or whose services are no longer used because he or she is considered unsuitable to work with children, this will be reported to the Disclosure and Barring Service within one month of the person leaving. Contact details for DBS: [disclosure-and-barring-service](#)

St Margaret's will also consider making a referral to the Teaching Regulation Agency (TRA) should a teacher's dismissal not reach the threshold for DBS referral but is for reasons such as 'unacceptable professional conduct' or a 'conviction, at any time, for a relevant offence'. Further guidance can be found through the Department for Education.

## **Training**

All staff and volunteers have read the, signed and understood the school's Staff Code of Conduct.

All staff and volunteers undertake training delivered by the DSL following the guidance from WCSB or via Training Toolz.

## **Induction**

The welfare of all our pupils is of paramount importance. All staff including volunteers are informed of our safeguarding procedures, including on line safety, at induction. Our induction process also includes:

- Staff 'check list' – an individual plan of support appropriate to the role for which they have been employed.
- All staff receive a copy of 'Keeping Children Safe in Education – Part 1' which they confirm they have read and understood. Regular reference is made in meetings to support staff in understanding their responsibilities for safer working practices as laid out in the Code of Conduct.
- Opportunities for a new member of staff to discuss any issues or concerns about their role or responsibilities.
- Confirmation of the line manager/mentor process whereby any general concerns about the person's ability or suitability will be addressed.
- Guidance for the use of mobile phones and cameras is included in the 'ICT Staff Acceptable Use' policy. This forms an important part of staff induction and applies throughout the school, including EYFS and after school care.
- All staff are required to complete a Staff Suitability declaration.

## **Safeguarding Training**

A record of all training is maintained, to ensure that all staff and volunteers receive child protection training at least every three years, with additional safeguarding guidance specific to their roles within the school.

All staff and volunteers are given regular support to understand their responsibilities in being alert to the signs of abuse or neglect as well as lower level child welfare concerns. Updates, including information regarding online safety, are disseminated through staff meetings, via email or our regular programme of in-house training. All staff, volunteers and governors know the name of the D/DSL and their role.

### **Advance Training**

The D/DSL has additional multi agency training which is updated at least every two years (in accordance with Wiltshire Schools CP Training guidance). The D/DSL also attends multi agency courses relevant to the school's needs. Knowledge and skills are refreshed at least annually via bulletins and attendance at networking events.

### **Safer Recruitment**

At least one person on any recruitment panel has undertaken Safer Recruitment training. This training is updated every five years as a minimum.

- In line with KCSiE 2023, St Margaret's follows safer recruitment practices: enhanced DBS check with barred list information, identity checks, verification of the candidate's mental and physical fitness, qualifications, employment references, right to work in the UK and prohibition for teaching and/or leadership and management.
- All checks are accurately recorded on a single central register and no member of staff or volunteer will be permitted to work in regulated activity without all the checks being made and cleared.

### **Preventing Radicalisation**

All staff & volunteers are given training and support in respect of the Prevent duty.

- As part of their induction new staff and volunteers will complete an online awareness training module.
- The DSL will raise awareness amongst staff that normal safeguarding procedures should be followed if there is a concern of radicalisation.

### **Staff Support**

Due to the demanding, often distressing nature of child protection work, we support staff by providing an opportunity to talk through the challenges of this aspect of their role with a senior leader and to seek further support as appropriate.

### **Governors**

Governors undertake the school's induction programme. They may choose to complete face to face training for governors provided by Wiltshire Council or on line training. In addition they may choose to attend whole school safeguarding and child protection training.

## **Definitions and indicators of Abuse and Neglect**

'What to do if you are worried a child is being abused 2015' describes some of the signs that might be indicators of abuse or neglect.

**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 abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse.

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

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

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

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

Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child.

Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate.

It may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

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

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

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

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

Many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health.

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

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

**Neglect:** *the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may*

*involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.*

Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action. However, while you may be concerned about a child, neglect is not always straightforward to identify.

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

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

**Other specific safeguarding issue**

**Child on child abuse – allegations of abuse against other children:**

At St Margaret's we believe that all children have a right to attend school and learn in a safe environment. All child on child abuse is unacceptable and will be taken seriously. Staff recognise that while both boys and girls can abuse their peers, it is more likely that girls will be victims and boys perpetrators of such abuse. child on child abuse is not tolerated or passed off as 'banter' or 'part of growing up'.

Occasionally, safeguarding allegations may be made against children by others in the school. This is most likely to include, but is not limited to:

- bullying (including cyber bullying)
- gender based violence/sexual assault
- sexting or
- initiation/hazing type violence and rituals.



Consequently, child on child abuse is dealt with as a safeguarding concern, recorded as such and not managed through the systems set out in the school behaviour policy.

Victims, perpetrators and any other child affected by child on child abuse will be supported through the school's pastoral system and the support will be regularly reviewed. Reference should be made to the school's anti-bullying and e-safety procedures.

We minimize the risk of child on child abuse by providing:

- a relevant curriculum, that help children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe.
- established/publicised systems for children to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously.

The DSL liaises with other professionals to develop robust risk assessments and appropriate specialist targeted work for children that are identified as posing a potential risk to other children. This may include referral to the MASH team with the expectation that all the children involved (alleged perpetrator and alleged victim) should be treated as being 'at risk'.

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

Both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants, or financial benefit. Young people being criminally exploited may be at a higher risk of sexual exploitation. It can happen to both boys and girls. It can be a one off or a series of incidents. Victims can be exploited even when the activity appears consensual. This can take place physically and also online.

#### **Some of the following signs may be indicators of sexual exploitation:**

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

### **Mental health**

Mental Health issues can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should observe the pupil and seek professional support through the DSL.

### **Female Genital Mutilation (FGM)**

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Staff must inform the D/DSL immediately if they suspect a girl is at risk of FGM.

By law, teachers must report to the police any 'known' cases of FGM in under 18s.

There are many different types of abuse but there are some that staff may be initially less aware of. Female Genital Mutilation (FGM) and Forced Marriage fall into this category.

Professionals need to be alert to the possibility of a girl being at risk of **FGM**, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM:

- Knowing that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school;
- The child may also talk about a special procedure/ceremony that is going to take place or a special occasion to 'become a woman'.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Indicators that FGM may already have occurred:

- Prolonged absence from school or other activities with noticeable behaviour change on return, possibly with bladder or menstrual problems;
- Difficulty walking, sitting or standing, and look uncomfortable;
- Spend longer than normal in the bathroom or toilet
- May complain about pain between their legs, or talk of something somebody did to them that they are not allowed to talk about.

**All teachers are to report to the police if they discover that an act of FGM has been carried out on a girl under the age of 18.**

### **Preventing Radicalisation**

Protecting children from the risk of radicalisation is seen as part of the school's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Staff should use their judgment in identifying children who might be at risk and speak to the D/DSL if they are concerned.

The D/DSL will act proportionately which may include making a referral to the Channel programme or the MASH.

*'Keeping Children Safe in Education 2023'* places a duty on schools to prevent pupils from being drawn into terrorism according to the Counter-Terrorism and Security Act; and for schools to cooperate with local Channel panels and the police as appropriate.

Exposure of children to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for sexual exploitation. Extremism can take several forms, including Islamist extremism and far-right extremism.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Radicalisation of young people can be compared to grooming for sexual exploitation.

Radicalisation is the process by which a person comes to support terrorism and forms of extremism.

- There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.
- Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.
- The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Early indicators may include:

- Vulnerability and social factors, such as:
  - Family or local community tensions
  - Low self-esteem
  - Experience of poverty, disadvantage, discrimination, social exclusion/perception of injustice
- Access to extremist influences or showing sympathy for extremist causes
- Advocating messages similar to illegal organisations
- Glorifying or justifying the use of violence to solve social issues
- Evidence of accessing/possessing illegal or extremist literature (including online)
- Pattern of regular or extended travel to locations known to be associated with extremism
- Significant changes to appearance, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

### Online safeguarding training (specific safeguarding issues):

- **Child Sexual Exploitation:** <https://keepthemsafe.safeguardingchildren.co.uk/>
- **Female Genital Mutilation:** <https://www.fgmelearning.co.uk/>
- **Prevent:** [www.elearning.prevent.homeoffice.gov.uk](http://www.elearning.prevent.homeoffice.gov.uk)  
New Home Office e-learning tool, aimed at those with responsibilities under the Prevent duty, particularly front line staff in schools, has been developed to help raise awareness of radicalisation.

### **Private fostering**

Under certain conditions, a child might be cared for, as part of a private arrangement, by someone who is not their parent or a 'close relative'. This constitutes private fostering when the following conditions are met:

- a child is under 16 years of age – 18 if they have a disability
- the arrangement is for 28 days or longer
- the child's new carer does not have parental responsibility for the child and is not a close relative.

Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

By law parents and carers must notify the local authority of private fostering arrangements to safeguard and protect the child's welfare as well as ensuring the child, carer and parent are receiving appropriate support and help.

At St Margaret's, if we do become aware that a child or young person is being privately fostered, we will inform the carer/parent of their legal duty to notify Wiltshire Children's Social Care; we will follow this up by contacting Children's Social Care directly.

### **Monitoring and Review**

Governors ensure that safeguarding is an agenda item for every full governing body meeting.

The Headmaster ensures that safeguarding is an agenda item for every staff meeting.

This policy is reviewed annually or earlier as required by changes to legislation or statutory guidance.

The nominated governor meets the DSL every term to monitor the effectiveness of this policy.

This policy considers at its heart, children's rights as exemplified by the United Nations Convention on the Rights of the Child. Specifically:

- Article 19 – Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them.

Review

**This policy will be reviewed at least annually by the Designated Safeguarding Lead and the Senior Leadership Team.**

**Next review due September 2024**

Effective Date

**This policy had a major review in September 2023.**

Approved by Governors

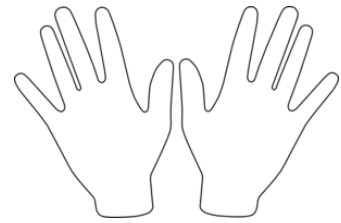
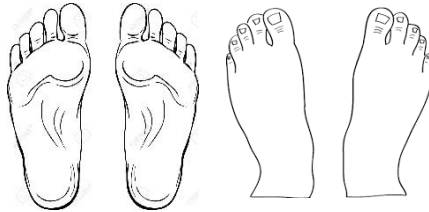
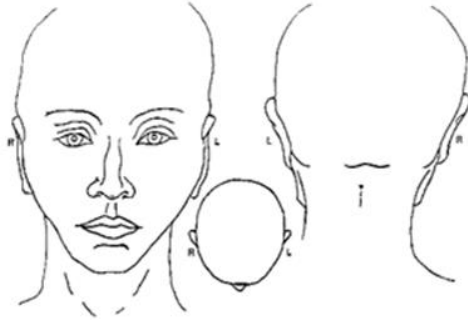
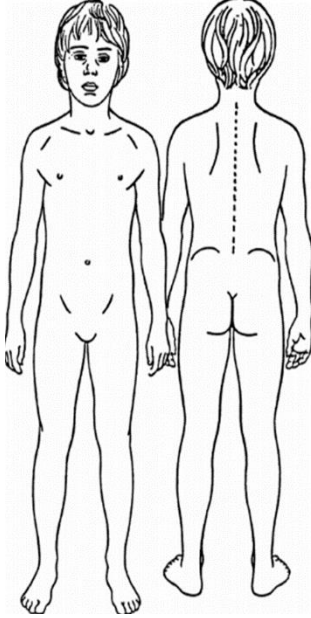
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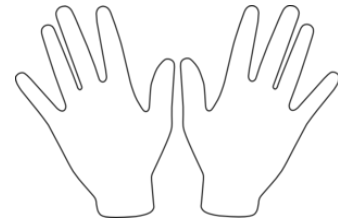


**Appendix 1**  
**St Margaret's Preparatory School**  
**Body Map**

**Children must not be undressed or photographs taken of any marks or injuries**



Palm



Back

## Concern Form Part B

To be completed by the school's Designated Safeguarding Lead (D/DSL)

Child's status with Early Help or Children's Social Care. Tick and add name where known at time of initial report.				
None	CAF	Child in Need	Child Protection Plan	Previous social care involvement
Name of allocated worker				

Name of D/DSL reviewing the concern		
Name of person taking actions	Actions – include whether concerns were shared with parents/carers, MASH and if not outline reasons why	Date

Feedback given to person who raised the concern?			Y / N
Feedback given by		Date	

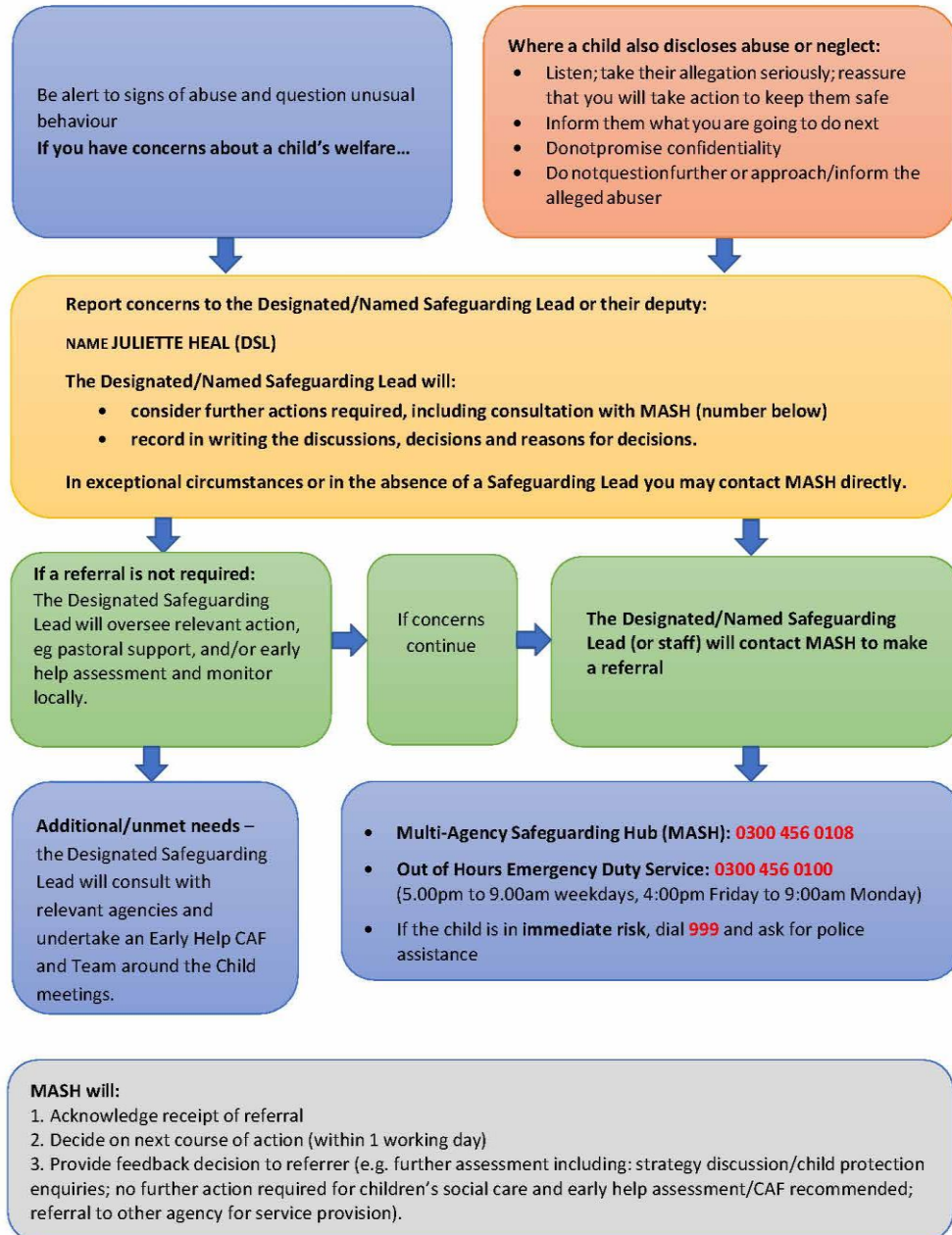




## APPENDIX 2

### What to do if you are worried a child is being abused or neglected

for staff, volunteers and visitors in all agencies and settings



This flowchart is intended for use as a brief guide. Refer to the DfE Guidance [What to do if you are worried a child is being abused](#) for more information, definitions and possible indicators of abuse (including child sexual exploitation).

## Allegations against adults in education settings: risk of harm to children (including schools, early years and alternative provision settings)



**If you become aware that a member of staff/volunteer/supply or bank staff MAY have:**

- Behaved in a way that **has harmed** a child, or **may have harmed** a child;
- Committed a **criminal offence** against or related to a child or
- Behaved towards a child or children in a way that indicates they **may pose a risk of harm** to a child
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

**Where a child also discloses abuse or neglect by a member of staff, volunteer or supply/bank staff:**

- Listen; take their allegation seriously; reassure that you will take action to keep them safe
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or approach/inform the alleged abuser

**Report immediately to the person in charge: LUKE BROMWICH (Headteacher)**

**Any concern or allegation against the person in charge will be reported to: Mr S ADE (Chair of governor)**

Unless there is clear evidence to prove that the allegation is incorrect, the person to whom the allegation was reported **must**:

**Report the allegation within one working day to the Designated Officer for Allegations (DOFA)**

- Contact the Multi-Agency Safeguarding Hub (MASH): **0300 456 0108** and select Option 3 then Option 4
- Or email [dofaservice@wiltshire.gov.uk](mailto:dofaservice@wiltshire.gov.uk)
- Out of Hours Emergency Duty Service: **0300 456 0100**  
(5.00pm to 9.00am weekdays, 4:00pm Friday to 9:00am Monday)

**The DOFA will:**

1. Consider the relevant facts and concerns regarding the adult and child or children, including any previous history
2. Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.

**If the allegation threshold is NOT met**, the DOFA will agree an appropriate response e.g. for your setting to undertake further enquiries or an internal investigation.

**If the allegation threshold is met** a strategy meeting will normally be held. Normally a senior manager/safeguarding lead, the DOFA, HR, Police and social care are invited to attend. Relevant information is shared, risks to children are considered and appropriate action agreed e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

## St Margaret's - Low Level Concerns Guidance

### Low Level Concerns

St Margaret's operates a 'low-level' concerns policy in accordance with KCSIE 2023. 'Low level' refers to behaviour that is: inconsistent with expectations set out in the Staff Code of Conduct, including inappropriate conduct outside of work, and/or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the DOFA. (Designated Officer for Allegations.)

All low-level concerns will be reported to the Headmaster, or in their absence, the Designated Safeguarding Lead (DSL); low-level concerns about the Headmaster will be reported to the chair of governors.

Examples of low-level concerns:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone outside of permissions
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door that does not have a glass panel/ visibility; or
- using inappropriate, sexualised, intimidating or offensive language

### The School will:

- ensure all staff are clear about what appropriate behaviour is (as set out in the Staff Code of Conduct) and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- encourage staff to share any low-level safeguarding concerns
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised, for both the child/ren and the adult
- respond to reports of low-level concerns in accordance with our HR conduct procedures by addressing unprofessional behaviour and supporting the individual to correct it at an early stage. When a concern has been raised via a third party, the Headmaster or DSL will collect as much evidence as possible by speaking:
  - o directly to the person who raised the concern, unless it has been raised anonymously.
  - o to the individual involved and any witnesses.

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

## Clarity around Allegation vs Low Level Concern vs Appropriate Conduct

<b>Allegation</b> Behaviour that indicates that an adult who works with children has: <ul style="list-style-type: none"><li>• behaved in a way that has harmed a child;</li><li>• possibly committed an offence against or related to a child;</li><li>• behaved towards a child or children in a way that indicates they may pose a risk of harm to children</li></ul>
<b>Low Level Concern</b> Any concern -no matter how small, even if no more than a nagging doubt- that an adult may have acted in a manner which: <ul style="list-style-type: none"><li>• is not consistent with the Staff Code of conduct</li><li>• relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's ability to work with children.</li></ul>
<b>Appropriate Conduct</b> Behaviour that is entirely consistent with the Staff Code of Conduct and the law.

### Storing and use of Low-Level Concerns and follow-up information

All low-level concerns will be recorded in writing, retained and reviewed to help recognise any weakness in the safeguarding system so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Low-level concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Low-level concerns and follow-up information will be stored securely within the school's safeguarding systems, with access only through the Headmaster and DSL. This will be stored in accordance with the school's GDPR and data protection policies.

Any staff member(s) reporting a concern must keep the information confidential and not share the concern with others apart from the Headmaster or DSL.

Whenever staff leave St Margaret's, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to: (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.



ST MARGARET'S PREP  
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Low level Concerns Reporting Form

<b>Name of person making the report</b>		
<b>Role</b>		
<b>Date and time</b>		
<b>Details of individual (including yourself for self-reporting) whom the concern is about</b>		
<b>Name</b>		
<b>Role</b>		
<b>Relationship to the individual reporting e.g. line manager</b>		
<b>Details of Low-Level Concern</b>		
<p>Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?</p>		
<b>Details of children or young people involved</b>		
<b>Name (s)</b>		
<b>Actions taken and follow-up</b>		
<b>Date</b>	<b>Action</b>	<b>Staff responsible</b>