



Safeguarding and Child Protection Policy

For the purpose of this policy 'the School' refers to the Haberdashers' Monmouth Schools (Monmouth School for Boys, Monmouth School for Girls, Monmouth School Boys' Prep, Monmouth School Girls' Prep and Monmouth Schools Pre-prep & Nursery).

This policy should be read in conjunction with the *CAL Policy/PSHE Policy, Anti-bullying Policy, Counter-Terrorism, Extremism and Radicalisation Policy* and *Physical Restraint Policies*.

1. Introduction

This policy is designed to address:

- (a) the School's charity law safeguarding duty to:
 - (i) provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;
 - (ii) set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
 - (iii) have adequate safeguarding policies, procedures and measures to protect people;
 - (iv) provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Charity Commission; and
- (b) the specific obligations on the School to safeguard and promote the welfare of children, as defined below.

The School accepts that it is the responsibility of every adult to protect children from abuse. All children have a right to be protected from all forms of abuse and discrimination and to be treated equally regardless of age, gender, racial origin, culture, religious belief, language, disability or sexual identity.

There are three main Aspects of this policy:

- a. prevention of abuse through our teaching and the pastoral support which is offered to pupils;
- b. procedures for identifying and reporting cases, or suspected cases, of abuse. (Teaching and non-teaching staff and School Prefects are well placed to observe signs of abuse because they are working closely with pupils); and
- c. support to pupils who may have been abused.

This policy applies to all staff at The Haberdashers' Monmouth Schools: both teaching and support staff. It also applies to the School Governors. School Prefects are also given Child Protection training alongside all pupils in Year 13/6.2. Anyone in these groups may be the first point of disclosure for a pupil and the School wants all staff to follow correct procedures for dealing with a case, or suspected case, of abuse.

The School understands its statutory duty under section 157 of the Education Act 2002 and Children's Act 2004 to safeguard and promote the welfare of children as described in section 175 of the Education Act 2002 and that we must give due regard to the Welsh Office circular 158/2015 *Keeping Learners Safe* as the safety and protection of children is of paramount importance to everyone in these schools.

The guidance and procedures within this document take into account the *Safeguarding Children: working Together Under the Children Act 2004, The Children and Young People's Plan (Wales) Regulations - September 2007, Shared Planning for Better Outcomes- September 2007, The Framework for Assessing Children in Need and their Families – 2001*. This policy also has regard to the Charity Commission's advice and guidance, including Strategy for dealing with safeguarding issues in charities (2017), Regulatory alert to charities - safeguarding (2017), and How to report a serious incident in your charity (2017).

Safeguarding is promoting well-being and welfare by safeguarding and promoting the welfare of children (as defined below) and protecting the rights of adults to live in safety, free from abuse and neglect.

In '*Keeping Learners Safe*', the National Assembly for Wales defines safeguarding and promoting the welfare of children as:

"Protecting children from abuse and neglect, preventing impairment of their health or development and ensuring that they receive safe and effective care to enable them to have optimum life chances."

The School will take reasonable steps to ensure that its pupils and others who come into contact with the School do not, as a result, come to harm or are exposed to abuse.

Any safeguarding concern raised by any person will be taken seriously and action taken in accordance with the relevant School policies and procedures.

2. Roles and Responsibilities

The Role of the Local Authority

The Local Authority has responsibilities at three levels: strategic, support and operational.

On a **strategic** level Monmouthshire County Council will plan, co-ordinate services and allocate resources working in partnership with other agencies.

At this level Monmouthshire County Council will:

- Work with other agencies to put in place and support effective partnership working including cross border processes;
- Allocate resources to enable educational settings and local authority staff can discharge their responsibilities for safeguarding children satisfactorily;
- Liaise with the appropriate diocesan authorities in respect of arrangements for safeguarding children in aided schools in Monmouthshire;
- Monitor the compliance of maintained schools using the guidance listed in Section 2 Legislative Framework above;
- Bring any deficiencies to the attention of the governing body of the school/setting and give advice as to how to remedy deficiency;
- Take action to resolve any inter-agency problems;
- Play a full part in case reviews in accordance with Chapter 10 of the Safeguarding Children: Working Together Under the Children Act 2004;

- Disseminate information about relevant findings from case reviews to designated staff for child protection in the authority and maintained schools;
- Allocate resources to support the work of the Safeguarding Children Board;
- Ensure that a senior officer represents the authority on the Safeguarding Children Board;
- Through the work of the Safeguarding and Quality Assurance Unit ensure that all internal and external educational providers fulfil their responsibilities in safeguarding children.

On a **support** level Monmouthshire County Council will endeavour to ensure that the governing body of all schools and further education institutions, the Head Teacher or Principal and proprietors of independent schools and other partnership agencies providing services for children and families:

- Are aware of their responsibilities for Child Protection
- Are aware of their responsibilities to Looked After Children in Monmouthshire;
- Have appropriate guidance and support available from the Monmouthshire Children's Services Safeguarding Unit/Team, facilitated by the Designated Education Safeguarding Officer;
- Have access to a programme of appropriate training;
- Have a Model Child Protection Policy for schools to follow (see Appendix 3);
- Have flowcharts and procedures to follow in line with the All Wales Child Protection Procedures 2008.

On an **operational** level Monmouthshire County Council will be responsible for promoting the safety and welfare of children in the following circumstances:

- Children excluded from school, or who have not obtained a school place (for example children in Pupil Referral Units);
- Children with complex medical needs and specific or additional learning needs;
- home educated children;
- Children subject to Child Protection Plans;
- Looked After Children; and
- Children who are educated outside of Monmouthshire.

The Monmouthshire Lead Officer for Safeguarding in Education is:-

Heather Heaney who can be contacted by:-

Phone- 01633 644392

Mobile- 07917707343

Email- heatherheaney@monmouthshire.gov.uk

Monmouthshire Children's Services can be contacted as follows:

Phone: 01291 635669

Out of hours telephone number: 0800 328 4432

The Role of the Governing Body

Governing bodies in Monmouthshire have a responsibility to ensure that:

- The School has an effective Child Protection/Safeguarding policy in place;
- The policy and the School's safeguarding procedures are reviewed annually. A copy of this policy is available on the School's website a hard copy is made available to parents and/or pupils on request;
- The School follows recommended procedures and guidelines for dealing with allegations of misconduct against members of staff, including child protection allegations, in line with MCC policy and WAG guidelines;
- The school operates safe recruitment procedures and ensures that all appropriate checks are carried out on all new staff and volunteers including governors in line with MCC policy, AWCPP 2008 (All Wales Child Protection Procedures 2008); Keeping Learners Safe (2015) and WAG guidelines;

- The School has designated senior members of staff who are appropriately trained to take lead responsibility for dealing with child protection;
- The Head Teachers and all staff and volunteers (including governors) undertake appropriate safeguarding training.

The Governing Body have nominated three of its members to take responsibility for the School's safeguarding arrangements within each school (Designated Governors for Safeguarding). Please see section 15 below for the name and contact details of the Designated Governor for Safeguarding for each school. The Designated Governors for Safeguarding meet termly with the Designated Safeguarding Persons at their respective schools and twice yearly as the Safeguarding Committee to review the effectiveness and implementation of the School's safeguarding arrangements.

The Role of Head Teachers

In Monmouthshire Head teachers have a responsibility to ensure that:

- Safeguarding/child protection policies and procedures adopted by the governing body or proprietor are fully implemented and followed by all staff;
- Sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children; and
- All staff and volunteers understand the procedures for and are supported in raising concerns with regard to children in their care.

The Role of the Designated Senior Person in Schools

The Designated Senior Person (DSP) for safeguarding fulfills an essential role in developing and implementing policies that help to protect children from all forms of abuse and create a safe school environment.

The designated person should:

- Take lead responsibility for managing child protection/safeguarding issues and cases;
- Promote the interests of Looked After Children in their school;
- Be a member of the school's management team;
- Take responsibility for the school's child protection practice, policy, procedures and professional development.

Responsibilities of staff in relation to safeguarding

Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. All staff have a duty to:

- report any concerns they may have about the safety and/or wellbeing of pupils;
- report any concerns they may have about the safety and/or wellbeing of other persons associated with the School;
- report any safeguarding concerns about staff or anyone else associated with the School.

The procedures for doing so are set out in this policy. If staff are unsure about the process, they should not hesitate to speak to the DSL or senior leadership team.

3. Training

The School will be cognizant of national and local training requirements and guidance, which will include Safeguarding Children Board guidance, advice and training opportunities.

All staff, whether permanent or temporary, Governors and volunteers who work with children shall, as part of their induction be given access to this policy and the name and contact details of the DSP when they start work. They shall receive basic (level 1) training from a level 3 trained person which will be updated at least every two years.

DSPs, senior members of staff responsible for Child Protection and people working in key pastoral roles shall receive interagency Child Protection training at Level 2/3 (Safeguarding Children Board) updated at least every three years.

DSPs evidence their on-going professional development in respect of safeguarding and child protection through attendance at level 3 Safeguarding Children Board training courses, or other specialist learning or training events.

The School will ensure that the Designated Senior Persons will have received initial training when starting their role and continued professional updates as required. Specific updates as suggested by national and local requirements will be central to the DSP's development. The designated deputy will be initially supported by the designated person and consideration for joint opportunities for training with the designated person will be considered.

All staff will be regularly updated during the year as appropriate from the designated person.

The governing body will also undertake Level 3 training every two years and the nominated governors will receive more specific training.

4. Child Abuse

Child abuse and particularly child sexual abuse can arouse strong emotions in those facing such a situation and it is important to understand those feelings and not allow them to interfere with your professional judgement.

Child abuse may come to light in a number of ways:

- i. A child may tell you what has happened to them;
- ii. From a third party (e.g. another child);
- iii. Through the child's behaviour;
- iv. A suspicious, unexplained injury to the child.

These notes are intended to provide a guide to help you identify signs of possible abuse and know what action to take in such cases.

The Main Forms of Abuse

Physical Abuse

The 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 or induces illness in a child whom they are looking after. Giving children alcohol, inappropriate drugs or poison is classified as physical abuse.

Sexual Abuse

Forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening, including:

- physical contact, including penetrative or non-penetrative acts
- non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or
- encouraging children to behave in sexually inappropriate ways.

Emotional Abuse

The persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional and behavioural development.

Neglect

The failure to meet a person's basic physical, emotional, social or psychological needs, which is likely to result in an impairment of the person's well-being (for example, an impairment of the person's health or, in the case of a child, an impairment of the child's development)

Abuse in all its forms can affect a child of any age. The effects can be so damaging that they may follow an individual into adulthood.

Identifying Signs of Possible Abuse

Recognising abuse is not easy, even for individuals who have experience of working with child abuse. Most children will receive cuts, grazes and bruises from time to time and their behaviour may give reason for concern. There may well be reasons for these factors other than abuse, but any concern should be immediately discussed with a senior colleague to assess the situation.

The School recognises that it has a responsibility to ensure that in safeguarding all pupils it must take into account the unique needs of certain members of its pupil body. This can include pupils with special educational needs or pupils for whom English is a second language. The School will ensure that each pupil's needs are taken into account whenever a discussion takes place, and will put appropriate measures in place to ensure that each pupil is comfortable and able to communicate.

Warning signs which may alert professionals to the possibility of abuse can include:

- i. Unexplained bruising, cuts or burns on the child, particularly if these are on parts of the body not normally injured in accidents;
- ii. An injury which a parent or carer tries to hide or for which they might have given different explanations;
- iii. Changes in behaviour such as the child suddenly becoming very quiet, tearful, withdrawn, aggressive, or displaying severe tantrums;
- iv. Loss of weight without a medical explanation;
- v. An inappropriately dressed or ill-kept child who may also be dirty;
- vi. Sexually explicit behaviour, for instance playing games and showing awareness which is inappropriate for a child's age;
- vii. Aggressive and inappropriate play;
- viii. Running away from home, attempted suicides, self-inflicted injuries;
- ix. A lack of trust in adults, particularly those who would normally be close to the child;
- x. Disturbed sleep, nightmares and enuresis particularly if a child has previously been dry;
- xi. Eating problems, including over-eating or loss of appetite.

Remember, the above signs do not necessarily mean that a child has been abused. If you are concerned about the welfare of a child, however, you must act. It is a legal duty, under the Social Services and Well-being (Wales) Act 2014 to inform the local authority if there is reasonable cause to believe that a child is at risk. Do not assume that someone else will help the child: they might not. Appendix A gives further information relating to symptoms.

Female Genital Mutilation (FGM)

In the UK, all forms of FGM are illegal under the *Female Genital Mutilation Act 2003*. It is an offence (regardless of their nationality and residence status) to:

perform FGM in the UK

- assist the carrying out of FGM in the UK
- assist a girl to carry out FGM on herself in the UK
- assist from the UK, a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident.

The Act also makes it an offence for UK nationals or permanent UK residents to:

- perform FGM abroad
- assist FGM carried out abroad by a UK national or permanent UK resident – this includes taking a girl abroad to be subjected to FGM
- assist from outside the UK for FGM to be carried out abroad by a non-UK person on a girl or woman who is a UK national or permanent UK resident – this includes taking a girl abroad to be subjected to FGM
- assist a girl to perform FGM on herself outside the UK, even in countries where the practice is legal.

Any information or concern that a child is at immediate risk of, or has undergone, FGM should result in an immediate child protection referral. This is a **mandatory duty**.

The All Wales Child Protocol on Female Genital Mutilation provides advice on safeguarding girls from FGM.

The Home Office has also produced multi-agency guidelines which outline the actions that should be taken by front-line professionals, such as teachers, health professionals, police officers and social workers, to protect girls and women and offer them the support they need.

If you have concerns that a girl or young woman may be taken overseas for FGM then you should immediately raise this concern with the DSP, who will be the Local Safeguarding Officer, or the Foreign and Commonwealth Office.

FORWARD is a UK organisation which provides support, counselling and safe space for girls and women to talk about their experiences. They can also educate and work with families to prevent FGM happening to any other girls in the family.

The NSPCC has a 24-hour helpline for anyone who is worried a child is at risk of, or has had FGM. You can call 0800 028 3550 or you can email fgmhelp@nspcc.org.uk.

Notify the DSP if you become aware of:

- A family arranging a long break abroad during the summer holidays, to a country where FGM is known practice.
- Unexpected, repeated or prolonged absence from school.
- Academic work suffering.
- A child may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

Indicators FGM may have taken place

A girl or woman who has had female genital mutilation (FGM) may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear

The physical effects of FGM

FGM can be extremely painful and dangerous. It can cause:

- severe pain
- shock
- bleeding
- infection such as tetanus, HIV and hepatitis B and C
- organ damage
- blood loss and infections that can cause death in some cases.

Radicalisation and 'Prevent' Duty

Please refer to *Counter-Terrorism, Extremism and Radicalisation Policy*.

In 2011, Welsh Government published guidance *Respect and resilience: Developing community cohesion – a common understanding for schools and their communities* which sets out the role that schools have in developing and supporting strategic approaches to promoting and maintaining community cohesion and eradicating violent extremism.

In 2012 the UK Government launched a refocused Prevent strategy. This strategy contained objectives to:

- respond to the ideological challenge of terrorism and the threat from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address.

The School will work with statutory safeguarding partners (such as local authorities, the police, the NHS and youth and offender management services) to:

- identify individuals at risk of being drawn into terrorism
- assess the nature and extent of that risk
- develop the most appropriate support plan for the individuals concerned.

The School will follow its mandatory duty to refer all concerns to the appropriate agencies.

5. Prevention

Abuse is more likely to be prevented or reported quickly if pupils have high self-esteem, confidence, supportive friends and open lines of communication with trusted adults.

At The Haberdashers' Monmouth Schools we will:

- i. maintain an ethos where pupils feel secure and are encouraged to talk and where they believe adults and prefects will listen;
- ii. make sure that pupils know that there are adults in the school whom they can approach if they are worried or are in difficulty;
- iii. include in the curriculum and in activities and PSHE lessons opportunities for pupils to gain self-esteem and confidence so they gain the skills to stay safe and to know to whom to turn for help;
- iv. include in the curriculum material which will help pupils to gain a supportive and caring attitudes to others.
- v. Have robust anti-bullying procedures and respond to every instance of bullying (alleged or suspected).

In order to help protect pupils from possible harm, members of staff are asked to take any adult who is looking for a pupil to the School Reception.

6. Procedures

The procedures followed at The Haberdashers' Monmouth Schools have been accepted by our LSCB (Local Safeguarding Children Board) and are in line with the All Wales Child Protection Procedures.

The School will:

- i. Ensure that senior members of staff are designated with the lead responsibility for child protection.
- ii. Ensure that DSPs appropriate training on a regular basis.
- iii. Inform staff and governors of the names of the designated members of staff.
- iv. Have procedures in place to take forward concerns when the designated persons are unavailable.
- v. Ensure that members of staff are aware of the need to be vigilant for signs of abuse and that they will know how to respond to a pupil who may tell of abuse.
- vi. Ensure that parents are sent information about the School's Child Protection policy and procedures.
- vii. Provide appropriate training for staff so that they understand their personal responsibilities, know the School's procedures, are vigilant and know how to support a pupil who tells of abuse.
- viii. Ensure that there are robust physical restraint procedures in place and that all staff are trained accordingly.
- ix. Notify the social services if a pupil on the child protection register is excluded from the School for a fixed term or permanently; or if there is an unexplained absence of a pupil on the child protection register of more than two days duration, or one day following a weekend.
- x. Maintain links with relevant agencies and cooperate as required with their enquiries regarding child protection matters including attendance at initial case conferences, core groups and child protection review conferences.
- xi. Keep written records of concerns about children even when there is no need to refer the matters to social services. These records will include date, event and action taken. These records will be confidential and kept in secure, locked locations.
- xii. Ensure that all staff are DBS checked and that all new staff are checked in accordance with Welsh Assembly guidance circular "*Keeping Learners Safe*".
- xiii. Designate Governors for Safeguarding.
- xiv. Act on any concerns about pupils who have been exposed to radicalisation, in accordance with our Radicalisation Policy.
- xv. Ensure that pupils with special educational needs are appropriately provided for and seek immediate support when a concern is raised by or about a pupil with SEN.
- xvi. Notify the Charity Commission in the case of a serious incident, in accordance with Charity Commission guidelines (see below for further information).

When a member of staff sees signs in the behaviour or attitude of a pupil which causes him or her concern, one of the members of staff responsible for Child Protection (DSP) must be informed. If, in the judgement of the DSP, a referral needs to be made, they will inform (within 24 hours in writing, or with written confirmation of a telephone referral) the relevant child protection/safeguarding service. Referrals should always be made to social services of the local authority where a pupil resides. In the case of a boarder who resides outside the UK, the referral should be made to Monmouthshire social services.

- i. If an allegation is made against a member of staff then this must be reported to the Head Teacher as well as the DSP (see *Keeping Learners Safe*).
- ii. If the cause for concern is the member of staff responsible for Child Protection, the DSP, then the member of staff should inform the Assistant DSP and the Head Teacher.
- iii. If the cause for concern is the Head Teacher then the Chairman of the Governors should be contacted.

If urgent action needs to be taken then the police should be notified at the earliest possible opportunity.

Further information and advice on these matters is available from the DSP.

The DSP has the responsibility for raising staff awareness of child protection matters. This will include giving a copy of the Safeguarding & Child Protection Procedure to new staff, making current staff aware of changes in the procedure and meeting with new staff to explain and answer questions on the procedures.

Listening to the Child

- i. Don't make promises which you may not be able to keep. Don't promise to keep what you have been told a secret as you have a responsibility to disclose information to those who need to know and they may be able to help.
- ii. Remember that the child's welfare is paramount and this must be the most important consideration.
- iii. Listen carefully to any complaint or allegation by the child and tell and show the child that you are taking them seriously.
- iv. Keep questions to a minimum but make sure you are absolutely clear about what a child has said so that you can pass on this information to professionals who are trained and experienced in investigating possible child abuse. Do not prompt or ask leading questions.
- v. Acknowledge how difficult and painful it must have been for them to confide in you and reassure the child, stressing that they are never to blame.
- vi. Stay calm: don't take hasty or inappropriate action.
- vii. As soon as possible after talking with the child make a written record of what the child said, how they were behaving, and what you did in response. Use their exact words if possible.
- viii. Note the date, time, place and names of those present and then sign this record and take it to the DSP as soon as possible after the meeting. Appendix B gives a template form. Alternatively, the school 'conversation record' form can be used. All conversations must be recorded on the appropriate conversation records, promptly.

Talking to Parents and Carers

When reading this section it must be remembered that the safety of the child must be paramount.

It is possible that a relationship with parents and carers will have been established and as a general principle it is important to be open and honest when dealing with them.

There may be circumstances, however, when it is not appropriate for parents to be informed immediately of the concerns you have, as this may prejudice any investigation and may place the child at even greater risk.

Always discuss your concerns first with the DSP (contact with parents should be delayed until advice has been sought from one of the professional agencies who have been notified).

Privately fostered children

The Children Act 2004 establishes the duty of all local authorities to promote awareness of the need to notify them about any privately fostered children living in their area.

In 2011 the Welsh Government published *Protecting Children, Supporting Foster Carers: A Toolkit for Dealing with an Allegation of Abuse* to assist fostering services in the public and independent sectors, and child protection managers in dealing with allegations against foster carers.

The School recognises its duty to notify the local authority of any private fostering arrangement that comes to their attention where they are not satisfied that the local authority has been, or would be, notified of the arrangement. It is good practice to inform the foster parents of the referral but if it is considered that this could place the child at risk of harm then it is not necessary to obtain consent.

Updated: October 2018 / Review: September 2019

The Children Act 1989 creates a number of offences in connection with private fostering, including failure to notify an arrangement or to comply with any requirement or prohibition imposed by the authority. The Children Act 2004 strengthens local arrangements for notification.

Responding to Child Abuse: What to do if you are concerned

Remember that it is not your responsibility to decide if child abuse has occurred, but it is your responsibility to take action, however small your concern.

Your first step must be to inform the DSP who will take responsibility for seeking any additional advice and for contacting the local Social Services Department or the police who are trained to deal with such situations and have the necessary legal power to protect the child.

If a DSP is not available, or concerns for the child remain, then you must contact the local Care Standards Inspectorate for Wales, Social Services Department, the Police or the NSPCC yourself. It is a legal duty (Social Services and Well-being (Wales) Act 2014) to raise a concern if there is due cause to do so. There will be immunity from disciplinary action against staff for “whistle blowing” in good faith.

The agency receiving your referral will take responsibility for ensuring that appropriate investigations are undertaken and the child protected.

The DSP and the main School office have the contact details of the [South East Wales Child Protection Board](#). The DSP liaises with the Designated Lead Officer for Safeguarding in Education (Monmouthshire).

Referrals

Referrals are made to the local authority where a pupil resides (or Monmouthshire, in the case of overseas boarders) by the DSPs, the Assistant DSPs or by a Level 3 trained member of staff who has informed the DSP or Assistant DSP that they are going to make a referral.

All records are collated (internal referral forms; conversation records and any other relevant information).

In most instances a preliminary discussion will be held between the DSP and the appropriate Children’s Services agency. This is to ensure that the correct information that is required, is shared.

A multi-agency referral form will be filled out and submitted. A copy will be held securely in the pupil’s safeguarding file, alongside all subsequent documentation.

The DSP or person making the referral may attend strategy meetings relevant to the case. Minutes of these meetings will be taken by a nominated minute-taker and a record will be kept on the pupil’s safeguarding file.

7. Supporting Pupils at Risk

The Haberdashers’ Monmouth Schools recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth or view the world as a positive place. School may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, whilst at school their behaviour may still be challenging and defiant or they may be withdrawn.

The School will support pupils through:

- i. The curriculum to encourage self-esteem and self-motivation.

- ii. The school ethos which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued.
- iii. The implementation of a good behaviour policy.
- iv. A consistent approach which will ensure the pupil knows that some behaviour is unacceptable but that they are always valued.
- v. A commitment to develop productive, supportive relationships with parents.
- vi. The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in child protection situations.
- vii. Recognition that statistically children with behavioural difficulties and disabilities are most vulnerable to abuse. Members of staff who work in any capacity with children with profound and multiple disabilities, sensory impairment and / or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.
- viii. Recognition that in a home environment where there is domestic violence, drug or alcohol abuse, children are vulnerable and in need of considerable support and/or protection.

8. Behaviour

The School has outlined in the Appendix behaviours, expected from all adults, which clearly state our values and expectations.

9. Records and Record Keeping

Well-kept records are essential in situations where it is suspected that a child may be at risk of harm.

All establishments, organisations and services in Monmouthshire are required to maintain accurate and relevant child protection/safeguarding records. These records must be kept in a secure place and separate from all other records pertaining to the child. These Child Protection Records should be accessed and maintained by the designated person/s only. Records should be clear, accurate, timed and dated with all actions and decisions recorded. The Schools will adhere to the requirements of General Data Protection Regulations (GDPR), which came into force on 25 May 2018.

Each establishment, organisation or service in Monmouthshire will need to include in their child protection policy specific procedures for the information sharing and the transfer of sensitive records as and when required.

10. Bullying

The Haberdashers' Monmouth Schools are committed to providing a friendly, caring environment for all our pupils and staff. We are committed to every person and our ethos is positive and inclusive. Bullying, in any form, is contrary to our principles and will not be tolerated. All members of the community have the right to work in a secure and caring environment. They also have a responsibility to contribute to the protection and maintenance of such an environment.

See *Anti-Bullying Policies* for further information.

Welsh Government guidance *Respecting Others: Anti-Bullying Guidance (24/2003)* provides information on tackling bullying in schools and the steps to be taken to support children and young people who report bullying outside school. It offers guidance on:

- bullying around race, religion and culture
- bullying involving children with special educational needs and disabilities
- homophobic bullying
- sexist, sexual and transphobic bullying
- cyberbullying – advances in communication technologies, and access to them by children and young people, has required schools to be vigilant and innovative in finding solutions to their misuse.

Tackling Hate Crimes and Incidents: A Framework for Action was launched by the Welsh Government in May 2014. The Welsh Government has funded a children and young person's helpline through MEIC Cymru and a National Hate Crimes and incidents Centre through Victim Support Cymru.

11. Physical Intervention

See Physical Restraint Policies for further information:

As part of our effective Safeguarding procedures, we recognise that there may be rare occasions where physical intervention is necessary. Physical intervention should only ever be used to:

- Maintain the safety of pupils and staff
- Prevent serious breaches of school discipline
- Prevent serious damage to property

Corporal Punishment

Under no circumstances should any form of corporal punishment be used upon a pupil.

Reasonable Force

There may be occasions when circumstances warrant the restraining of a child – holding the child against their will.

The law does not lay down precise acts of force which are deemed 'reasonable' in given circumstances. Its use will always depend upon the particular circumstances.

The use of force can be minimised by:

- Creating a calm environment that minimises the risk of incidents
- De-escalating incidents if they do arise
- It is important to communicate calmly with the pupil, using non-threatening behaviour and language, ensuring the pupil can see a way out of a situation. Strategies might include going to a quiet room away from bystanders.

Restraint is only used when the risks involved in doing so are outweighed by the risks involved in not using force.

12. What to do if staff have a concern about someone else's welfare

Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

In the absence of an express procedure about reporting, they should report such concerns to their line manager in the first instance.

13. Whistleblowing

The School has a policy and procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct including potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. The policy also provides if necessary, for such concerns to be raised outside the organisation. Please see the School's Whistleblowing policy (section 22 of the Employment Manual).

Please see Appendix D of this policy for the procedures applicable to dealing with allegations against staff involving risks of harm to children.

The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School. See Appendix C of this policy for further information.

14. Additional reporting

In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

Charity Commission

The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance [How to report a serious incident in your charity \(Charity Commission, September 2017\)](#).

Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils. This is likely to involve the following:

- (i) pupils have been, or are alleged to have been, abused or mistreated while under the care of the School or by someone connected with the School, for example a Governor, staff member or volunteer;
- (ii) there has been an incident involving the abuse or mistreatment (alleged or actual) of someone and this is connected with the activities of the School;
- (iii) there has been a breach of the School's procedures or policies which has put pupils at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children.

The School will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy.

Insurers

The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and / or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

If the School is in any doubt with regard to the correct insurer and / or policy and / or if it is unable to locate the relevant insurer, professional advice should be sought.

Boarding Schools Association (BSA)

The School will report to the BSA all safeguarding cases which have resulted in a referral to an external body and which involve allegations against staff or peer on peer abuse.

15.Safeguarding Teams

Monmouth Schools Pre-prep & Nursery



Mr Matthew Wren
DSP
(Designated Senior Person)



Mrs Jo Booth
Designated Governor for
Safeguarding

Monmouth School for Girls and Monmouth School Girls' Prep



Mr Tom Arrand
DSP
(Designated Senior
Person)



Mrs Olwen Davis
DSP
(Designated Senior Person)



Mrs Hilary Phillips
Monmouth School Girls'
Prep
Safeguarding Officer



**Mrs Sharon
Clayton**
Designated
Governor for
Safeguarding

Colleagues who are trained to Level 3:

Monmouth School for Girls and Monmouth School Girls' Prep

Mr	Tom	Arrand	Acting Head, Monmouth School for Girls
Mrs	Carolina	Avila-Jones	Head of Year 10
Miss	Michelle	Boulton	HR Administration Manager
Mrs	Leslea	Caffel	School Nurse
Mrs	Bernie	Cloete	Houseparent, Augusta House
Mrs	Olwen	Davis	Deputy Head, Monmouth School for Girls
Mrs	Helen	Edwards	Secretary to Deputy Head & Boarding
Mrs	Jane	Hastings	Head of Year 13
Mrs	Alison	Hutchings	Head of Year 11
Mrs	Gillian	Morris	Senior House Parent, Twiston Davies House
Mr	Martin	Morris	Houseparent, Twiston Davies House
Mr	Mike	Powell	Houseparent, School House
Mrs	Rachel	Rees	Head of Sixth Form
Mrs	Hilary	Phillips	Headmistress, Monmouth School Girls' Prep
Mr	Tom	Evans	Deputy Head, Monmouth School Girls' Prep

Monmouth School for Boys and Monmouth School Boys' Prep

Mr Simon Dorman
DSP
(Designated Senior
Person)



Miss Sarah Fowler
Assistant DSP



Mr David Hope
Assistant DSP



Mr Alex Peace
Assistant DSP



Mr Neil Shaw
Monmouth School
Boys' Prep
Safeguarding Officer



Mr Philip Alderman
Designated Governor for
Safeguarding

Colleagues who are trained to Level 3:

Monmouth School for Boys and Monmouth School Boys' Prep

Dr	Andrew	Daniel	Headmaster, Monmouth School for Boys
Mr	Simon	Dorman	Second Master, Monmouth School for Boys
Miss	Sarah	Fowler	Deputy Designated Senior Person
Mrs	Louise	Goodwin	School Nurse
Mrs	Liz	Gregory	Deputy Head (Academic)
Mr	Andrew	Hawley	Housemaster Town House
Mr	David	Hope	Housemaster Weirhead House
Mr	Matthew	Lewis	Housemaster School House
Mrs	Georgie	Peace	Housemaster Tudor House
Ms	Sheila	Mone	Housemaster Chapel House
Mr	Alex	Peace	Housemaster New House
Mr	Keith	Madsen	Housemaster Glendower House
Mr	Neil	Shaw	Head Teacher, Monmouth School Boys' Prep

Haberdashers' Monmouth Schools (HMS) Governors and joint schools staff

Mr	Audley	Twiston-Davies	Chairman of Governors
Mr	Philip	Alderman	Designated Safeguarding Governor, MB/MBP
Mr	Martin	Anderson	Governor
Mrs	Jo	Booth	Designated Safeguarding Governor, MPP
Professor	Richard	Carwardine	Governor
Mrs	Sharon	Clayton	Designated Safeguarding Governor, MG/MGP
Mr	Max	Davidson	Governor
Mrs	Mary	Henderson	Governor
Dr	James	Kelly	Governor
Mr	Michael	Kerrigan	Governor
Mr	Noel	Manns	Chairman MG Committee
Mr	Roger	Miners	Governor
Mrs	Hilary	Moriarty	Governor
Councillor	Richard	Roden	Governor
Mrs	Ruth	Rose	Governor
Mrs	Lesley	Russen	Governor
Mr	Nick	Waters	Governor
Mrs	Tessa	Norgrove	Foundation Bursar
Rev	Clifford	Swartz	Chaplain
Mr	Kingsley	Jones	Head of Boarding
Mrs	Karen	Wood	Head of Catering

Appendix A Child Protection

Checklist of Signs and Symptoms of Abuse

1. Signs of physical abuse

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Untreated injuries
- Admitting to punishment that appears to be excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered during hot weather
- Fear of returning home
- Self-destructive tendencies
- Aggression towards others
- Running away

2. Signs of emotional and verbal abuse

- Physical, mental and emotional development lags behind that of others of a similar age
- Admitting to punishment that appears excessive
- Over-reaction to mistakes
- Continued self-depreciation
- Sudden speech disorders
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (rocking, hair twisting, thumb sucking)
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Running away
- Compulsive stealing, scavenging

3. Signs of neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self-esteem
- No social relationships
- Running away
- Compulsive stealing or scavenging

4. Signs of sexual abuse

- Sudden changes in behaviour or school performance
- Displays of affection in a sexual way inappropriate to age
- Tendency to cling or need constant reassurance
- Tendency to cry easily
- Regression to younger behaviour (thumb-sucking, acting like a baby)
- Complaints of genital itching or pain
- Distrust of familiar adults
- Unexplained gifts (money or kind)
- Depression or withdrawal or apparent secrecy
- Wetting, day or night
- Sleep disturbances/nightmares
- Anorexia/bulimia
- Unexplained pregnancy
- Fear of undressing for PE, Games and in the boarding house
- Phobias or panic attacks

Appendix B

To the Designated Person for Child Protection (DSP)	
SAFEGUARDING INCIDENT/CONCERN FORM	
Pupil name:	Date of birth:
	Year group:
Name and position of person completing form: (please print)	
Date of incident:	
Incident/concern: (who/what/where/when)	
Any other relevant information: (witnesses, immediate action taken)	
Action taken:	
Signature:	
Date form completed:	

Appendix C

Guidelines on the Prevention of Allegations of Abuse

1. Context

- a. Staff working in education settings have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help adults establish the safest possible learning and working environments which safeguard children and young people and reduce the risk of adults working with them being falsely accused of improper or unprofessional conduct.
- b. This means that these guidelines:
 1. apply to **all** adults working in education settings whatever their position, role or responsibilities;
 2. may provide guidance where an individual's suitability to work with pupils has been called into question.

2. Curriculum

- a. Staff should be aware that curriculum content can sometimes include subject matter which is sexually explicit or of an otherwise sensitive nature. Care should be taken to ensure that curriculum materials cannot be misinterpreted and clearly relate to the learning outcomes identified for that lesson. Schemes of work should highlight particular areas of risk and sensitivity.
- b. The curriculum can sometimes include or lead to unplanned discussion about subject matter which is sexually explicit, or of an otherwise sensitive nature. Responding to pupils' questions may require careful judgement and staff may wish to take guidance in these circumstances. This means that staff should not enter into or encourage inappropriate or offensive discussion about sexual activity.
- c. Care should also be taken to abide by the School's policy on sex education and the wishes of parents who have the right to withdraw their children from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction).
- d. This means that all adults should:
 1. have clear written lessons plans;
 2. take care when encouraging pupils to use self expression, not to overstep personal and professional boundaries;
 3. be able to justify all curriculum materials and relate these to clearly identifiable lessons plans.
- e. This means that all adults should not:
 1. enter into or encourage inappropriate discussions about sexual activity or any behaviours which may offend or harm others.

3. Physical Education and other activities, which require physical contact

- a. Some staff, those who teach PE and games or who offer music tuition, for example, will on occasions have to initiate physical contact with pupils in order to support a child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's, usually verbal, agreement.
- b. Contact under these circumstances should be for the minimum time necessary to complete the activity. This means that staff should:
 1. consider alternatives where it is anticipated that a pupil might misinterpret any such contact perhaps involving another member of staff or a less vulnerable pupil in the demonstration;

2. always explain to a pupil the reason why contact is necessary and what form that contact will take.
 - c. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.
 - d. Staff must remember:
 1. never to touch a child in a way which may be considered indecent;
 2. to always be prepared to explain actions and accept that all physical contact should be open to scrutiny;
 3. never to indulge in horseplay, tickling or fun fights;
 4. they should not use an object, such as a stick, to make physical contact;
 5. physical contact should never be secretive, or for the gratification of staff, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded in writing as soon as possible and given to CPLO with a copy placed on the child's file.
 - e. This means that adults should:
 1. be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described;
 2. never touch a child in a way which may be considered indecent;
 3. always be prepared to report and explain actions and accept that all physical contact should be open to scrutiny;
 4. not indulge in horseplay;
 5. always encourage children, where possible, to undertake self-care tasks independently;
 6. work within Health and Safety regulations;
 7. be aware of cultural or religious views about touching and always be sensitive to issues of gender;
 8. understand that physical contact in some circumstances can be easily misinterpreted.
4. **Trips and off site visits**
 - a. These guidelines must apply to residential/non residential visits. Aspects of Child Protection must be included in the Risk Assessment where appropriate. Always refer to Keeping Learners Safe, 2015.
 - b. Particular attention must be paid to:
 1. when pupils are staying with host families, staff must be aware of any vetting process that goes on in-country and by the local school/agent;
 2. when pupils are staying in a residential centre/hostel/hotel. Pupils must only stay in accredited, official and recognised venues and must seek assurance that appropriate child protection checks are in place.
5. **Internet use**
 - a. Members of staff are permitted to use portable devices appropriately. The school has clear policies and an Acceptable Users Policy about access to and the use of the internet. Under no circumstances should staff in school access inappropriate images.
 - b. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material, is behaviour that, if proven, will invariably result in the individual being barred from work with children and young people.
 1. In general a person's private activities, including use of the internet, that does not involve child pornography or other illegal material, will not impinge on his or her suitability to work with children. However, using school or college equipment to access other inappropriate or indecent material, including adult pornography, will give grave cause for concern, particularly if

as a result pupils might be exposed to inappropriate or indecent material. Staff should be aware that this would be construed as gross misconduct under the school's normal disciplinary procedures.

2. No pupil should use a member of staff's personal portable device or have access to the staff shared area.
- c. This means that The School should:
 1. have clear e-safety policies in place about access to and use of the internet;
 2. make guidance available to both adults and pupils about appropriate usage.
- d. This means that all adults should:
 1. follow their school's guidance on the use of portable devices;
 2. ensure that children are not exposed to unsuitable material on the internet;
 3. ensure that any films or material shown to pupils are age appropriate.

6. **One-to-one situations**

- a. Every organisation working with or on behalf of children and young people should consider one-to-one situations when drawing up their policies. This includes schools and other education settings.
- b. It is not realistic to state that one-to-one situations should never take place. It is, however, appropriate to state that where there is a need, agreed with a senior manager and/or parents/carers, for an adult to be alone with a child or young person, certain procedures and explicit safeguards must be in place. Adults should be offered training and guidance in the use of any areas of the workplace which may place themselves or children in vulnerable situations.
- c. One-to-one situations have the potential to make a child/young person more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one-to-one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one-to-one situations are unavoidable, reasonable and sensible precautions are taken. Every attempt should be made to ensure the safety and security of pupils and the adults who work with them.
- d. There are occasions where managers will need to undertake a risk assessment in relation to the specific nature and implications of one-to-one work. These assessments should take into account the individual needs of the child/young person and the individual worker and any arrangements should be reviewed on a regular basis.
- e. Pre-arranged meetings with pupils away from the school premises should not be permitted unless approval is obtained from their parent and the Head or other senior colleague with delegated authority.
- f. This means that adults should:
 1. ensure that when lone working is an integral part of their role, full and appropriate risk assessments have been conducted and agreed;
 2. avoid meetings with a child or young person in remote, secluded areas;
 3. always inform other colleagues and/or parents/carers about the contact(s) beforehand, assessing the need to have them present or close by;
 4. avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.
 5. always report any situation where a child becomes distressed or angry to a senior colleague;
 6. carefully consider the needs and circumstances of the child/children when in one-to-one situations.

7. **Transporting pupils**

- a. In certain situations, e.g., out of school activities or medical emergencies, staff or volunteers may be required to transport children. The Deputy Head (Pastoral) should be notified of any journeys.

- b. Staff should not transport children alone, whenever practicable.
- c. Children should sit in the back of a car only, with seatbelts on.
- d. This means that The School should have appropriate policies for transporting pupils.
- e. This means that adults should:
 - 1. ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive;
 - 2. be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer;
 - 3. record details of the journey in accordance with agreed procedures;
 - 4. ensure that their behaviour is appropriate at all times;
 - 5. ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven;
 - 6. ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.

8. **First Aid and administration of medication**

- a. Only staff who are trained should administer First Aid. When administering First Aid, staff should ensure that other adults or children are present, or aware of the action being taken, even in extreme emergency circumstances, whenever possible. Parents should always be informed when First Aid has been administered.
- b. This means that staff should:
 - 1. make other staff aware of the task being undertaken;
 - 2. explain to the child what is happening.
- c. Ideally, First Aid and administration of medicine should be carried out by the Medical Centre staff. The School adheres to the policies and agreed procedures of its Medical Centre staff regarding the administration of medication.
- d. This means that school should:
 - 1. ensure staff understand the extent and limitations of their role in applying basic care and hygiene tasks for minor abrasions and understand where an injury requires more experienced intervention;
 - 2. ensure there are trained and named individuals to undertake first aid responsibilities;
 - 3. ensure training is regularly monitored and updated;
 - 4. always ensure that arrangements are in place to obtain parental consent for the administration of first aid or medication.

9. **Photography, video and other creative arts**

- a. Many school activities involve the taking of images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement.
- b. Using images of children for publicity purposes will require the consent of either the individual concerned or in the case of under-age pupils, their legal guardians. This means that images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the school have access.
- c. This means that staff should:
 - 1. be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded;
 - 2. ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose;
 - 3. ensure that all images are available for scrutiny in order to screen for acceptability;
 - 4. be able to justify images of children in their possession;

5. avoid making images in one-to-one situations;
 6. Where possible use school equipment.
- d. It is recommended that when using a photograph the following rules should be followed:
1. if the photograph is used, avoid naming the pupil, unless the photograph is to be used by the local press and permission has been given;
 2. if the pupil is named, avoid using his/her photograph;
 3. the School establishes whether the image will be retained for further use;
 4. images are securely stored and used only by those authorised to do so.
- e. This means that staff should not take or distribute images of children unless they have the consent of both the child and parents.
- f. This means that adults should:
1. be clear about the purpose of the activity and about what will happen to the images when the activity is concluded;
 2. be able to justify images of children in their possession;
 3. avoid making images in one-to-one situations or which show a single child with no surrounding context;
 4. ensure the child/young person understands why the images are being taken and has agreed to the activity and that they are appropriately dressed;
 5. only use equipment provided or authorised by the school;
 6. report any concerns about any inappropriate or intrusive photographs found;
 7. always ensure they have parental permission to take and/or display photographs.

10. **Showers and changing**

- a. Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be a required level of supervision to safeguard young people and satisfy health and safety considerations and to ensure that bullying or teasing does not occur. The supervision will need to be appropriate to the needs and age of the young people concerned.
- b. Staff, therefore, need to be vigilant about their own behaviour. This means that staff should:
1. announce their intention of entering changing rooms;
 2. avoid remaining in changing rooms unless a pupil's needs require it;
 3. avoid any physical contact when children are in a state of undress;
 4. avoid any visually intrusive behaviour;
 5. not change in the same place as children;
 6. not shower with children.

11. **Communication with pupils**

- a. Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, personal emails, digital cameras, videos, web-cams, websites and blogs.
- b. Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.
- c. Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.
- d. They should not give their personal contact details to pupils including personal email, home or mobile telephone numbers, unless the need to do so is agreed with

senior management and parents/carers. Personal email or text communications between an adult and a child/young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through websites.

- e. This means that adults should:
1. ensure that personal social networking sites are set as private and pupils are never listed as approved contacts;
 2. never use or access social networking sites of pupils;
 3. not give their personal contact details to pupils, including their mobile telephone number;
 4. only use equipment, e.g., mobile phones, provided by school/service to communicate with children, making sure that parents have given permission for this form of communication to be used;
 5. only make contact with children for professional reasons and in accordance with any school/service policy;
 6. recognise that text messaging should only be used as part of an agreed protocol and when other forms of communication are not possible;
 7. not use internet or web-based communication channels to send personal messages to a child/young person.

12. **Social contact**

- a. Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship, pursuing or strengthening a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that contact could be misconstrued.
- b. This means that staff should:
1. always approve any planned social contact with senior colleagues;
 2. advise senior management when regular social contact occurs through activities not linked to school;
 3. report and record any situation which, they feel, might compromise the school or their own professional standing.

13. **Pupils in distress**

- a. There may be occasions when a distressed pupil needs comfort and reassurance. This may include appropriate physical contact. Staff should remain self-aware at all times to ensure that their contact is not threatening or intrusive and not subject to misinterpretation.
- b. This means that staff should:
1. consider the way in which they offer comfort to a distressed pupil;
 2. always tell a colleague when and how they offered comfort to a distressed child;
 3. record any situation which may give rise to concern.

14. **Intimate Care**

This should not be carried out other than by a qualified member of staff.

15. **Sexual contact with young people**

- a. A young person is classified as under 18 years of age or in full-time (secondary/tertiary) education. Sexual contact with a pupil in school, regardless of age, is a criminal offence as it constitutes a breach of our duty-of-care. Activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

- b. Adult behaviour may also involve 'grooming' a child. This can involve an adult conferring special attention and favour upon a child with the intent of sexually abusing him/her at a future point.
- c. This means that staff should not pursue sexual relationships with children and young people either in or out of school.
- d. Avoid any form of communication with a child or young person which could be misinterpreted as sexually suggestive or provocative, i.e., verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact. Sexual behaviour towards and/or developing a sexual relationship between a member of staff with any young person is inappropriate and illegal. This behaviour is considered as gross misconduct and will result in immediate suspension pending investigation.

16. **Gifts**

- a. Receiving of gifts is essentially inadvisable as it may be inappropriate and in some cases constitute a criminal offence. Of course, there are occasions when children wish to pass small tokens of appreciation to staff at Christmas time or as a thank-you gift. In the context of creating safe working practices it is also inadvisable to give or receive gifts regularly or of any value to individual young people. This could be misinterpreted by the pupil, their parents/carers or other adults. It can be misconstrued as a gesture either to bribe or single out the young person and it might be perceived that a 'favour' of some kind is expected in return.
- b. This means that staff should:
 - 1. ensure that gifts received or given in situations which may be misconstrued should be declared;
 - 2. not give preferential treatment to any individual young person on a regular basis;
 - 3. ensure that any gifts given as a part of a reward system are small and an accepted part of school practice.

17. **Infatuation**

- a. Staff need to be aware that it is not uncommon for a pupil to develop an infatuation for a member of staff. Staff should be aware that pupils can be strongly attracted to a member of staff and may develop a heterosexual or homosexual infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. A member of staff who becomes aware that a pupil may have developed an infatuation (for themselves or a colleague) should discuss this at the earliest opportunity with a senior colleague so that appropriate action can be taken, where necessary.

18. **Dress and appearance**

- a. It is necessary and wise for staff to consider the manner of dress and appearance appropriate to their professional role as opposed to that which may be adopted in their personal life. This means that staff should wear clothing which:
 - 1. promotes a positive and professional image;
 - 2. is appropriate to their role;
 - 3. may not be viewed as offensive, revealing, or sexually provocative;
 - 4. does not distract, cause embarrassment or give rise to misunderstanding;
 - 5. is absent of any slogans.
- b. Staff who dress or appear in a manner which could be considered as inappropriate or offensive, could render themselves vulnerable to criticism or allegation and should expect guidance from senior staff.

19. **Searching**

- a. If an investigation or an allegation leads to a decision to search a pupil, her clothes, bags or locks, **two** staff members must be present while the search is conducted.
- b. Pupils must be asked to empty pockets and bags themselves.

20. **Personal Care**

- a. Young people, particularly in boarding, are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions when there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.
- b. Adults need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils with whom they work.
- c. This means that all adults should:
 1. avoid any physical contact when children are in a state of undress;
 2. avoid any visually intrusive behaviour;
 3. announce their intention of entering where there are changing rooms.
- d. This means that adults should not:
 1. change in the same place as children;
 2. shower or bathe with children;
 3. assist with any personal care task which a child or young person can undertake by himself/herself.

21. **Use of Personal Living Space**

- a. No child or young person should be in or invited into, the home of boarding staff who work with them, unless the reason for this has been firmly established and agreed with parents and a senior manager.
- b. Under no circumstances should pupils assist with chores or tasks in the home of an adult who works with them. Neither should they be asked to do so by friends or family of that adult.
- c. This means that adults should:
 1. be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations;
 2. challenge any request for their accommodation to be used as an additional resource for the school or school/service;
 3. be mindful of the need to maintain professional boundaries;
 4. refrain from asking pupils to undertake personal jobs or errands.

Appendix D

Dealing with an Allegation Against a Member of Staff or Adult

This flowchart should be used as a brief checklist of procedure in the event of an allegation against a professional in school.

Detailed procedures to follow are outlined in All Wales Child Protection Procedures 2008, Section 4. Responsibilities are outlined in *Safeguarding Children: Working together under the Children Act 2004* – Welsh Assembly Government 2007. See also 5.2 v *Safeguarding Children in Education Handling Allegations* and 5.2 ii *Keeping Learners Safe 2015*

