



## **SAFEGUARDING POLICY**

### Introduction

As a Jesuit School inspired by the insights of St. Ignatius, Mount St. Mary's College stresses the importance of each person in the sight of God. Each is unique in creation and has different gifts and talents which are to be developed to the full. This requires a genuine respect and concern for the well-being, physical, spiritual and emotional security of others, for their feeling and beliefs, their strengths and weaknesses and their cultural or racial backgrounds. Central to this notion is a love for justice, a hatred of unfair treatment or discrimination, a special concern for the poor, vulnerable and helpless and a resolution to protect children against abuse of any kind.

All those who come into contact with our pupils in their everyday work at this College, including those who do not have a specific role in relation to Safeguarding, have a duty to safeguard and promote the values which the tradition and ethos of the College holds dear, and to safeguard the welfare of the young people in our care. This means being supportive to children in need and safeguarding those who are at risk of harm.

Child abuse can happen within or outside the school environment and all staff must raise their awareness of the signs in order to protect the pupils with whom they work. An attitude that "such things cannot happen here" is unhelpful and untrue. In many cases of child abuse those who have caused harm to the child are the parents or carers but there are others who may harm children. It is particularly important in the school context that all staff are aware that an alleged abuser could be another pupil, or a young person with whom the pupil has contact outside school. As a boarding school we must have a particular awareness of the possibility of abuse between pupils. Whether the suspected abuser is adult or another child the procedure in this policy should be equally followed. The school will have no hesitation in referring abuse to outside agencies, nor in working with outside agencies to support pupils in need.

All our students are taught about safeguarding, including online issues, as part of a broad and balanced curriculum.

It is important that our students receive help as early as possible so that issues do not escalate and risks are appropriately managed. This is why we are committed to listening to the voice of the child, keeping clear records, sharing information and challenging inaction. We will always act in the best interests of the child.

This fulfils the College's common law duty of care towards children. We work closely with several outside agencies including Derbyshire Safeguarding Children Board, Derbyshire County Council, Derbyshire CAYA and Derbyshire Police and use the most up-to-date statutory guidance; *Keeping Children Safe in Education, September 2018* and *Working Together to Safeguard Children, July 2018*.

### Minimising Risk

#### **Staff Appointments**

Staff appointments follow procedures laid down by the Department for Education, the Disclosure and Barring Service and Mount St. Mary's College Safer Recruitment Policy. It is essential that all staff (including Full time, Part time, Supply and Peripatetic) and volunteers having access to pupils have an enhanced DBS check. This also applies to people employed by another organisation, or self-employed, who may be working with our pupils on or off site. All appointments must be confirmed by the Human Resources

Manager, who ensures that an enhanced DBS clearance is received before work commences. Adult relatives living with those staff resident on site must also be subject to the same checks. The request for a DBS check is present in any offer letter and the appointment is subject to this being satisfactory. The school ensures that sufficient relevant staff are trained in safer recruitment processes.

If the school considers that a person is unsuitable to work with children a report will be sent promptly to the Disclosure and Barring Service; this will apply if the school has dispensed with their services or if the school would have done so had the person not resigned.

The school will also make consideration of making a referral to the National College for Teaching and Leadership should a teacher have been dismissed (or would have been dismissed had they not resigned) because of unacceptable professional conduct or conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence.

Should a member of the boarding staff be suspended in circumstances of a safeguarding nature the school will find alternative accommodation.

### **Volunteers**

Whenever a volunteer is used there must be a risk assessment carried out by the relevant manager in conjunction with the DSL. This will determine whether an enhanced DBS will be requested or not.

### **Staff**

Jack Murphy, Deputy Head (Pastoral), is the designated Senior Leader for Safeguarding for Mount St. Mary's College. When he is away from school the Deputy SL will take on the responsibility. This is Mr Christopher McAllister, Deputy Head (Academic). In the absence of both these members of staff Mrs Karen Keeton, Head teacher of Barlborough Hall School will act as SL. The named governor for safeguarding issues is Mrs Marian Bolton.

All staff receive safeguarding training on induction. The Safeguarding Leads receive formal training every two years, their skills and knowledge are regularly refreshed by updates and discussion with other professionals; all other staff receive regular training and updates to provide them with the relevant skills and knowledge to safeguard children effectively. Safer recruitment training is available to all relevant staff and governors who are involved in the recruitment process. It is the responsibility of the Human Resources Manager in consultation with the SL to ensure that training happens in an appropriate and timely manner. All up-dates will be in accordance with the advice and requirements of the LSCB.

Any deficiency in the procedure noted by a member of staff will be remedied without delay and the policy is reviewed annually by the Board of Governors, together with the efficiency with which the related duties have been discharged. This includes, annually, a report of any Safeguarding cases that have been referred to Social Services. The safeguarding policy is signed off by the Chair of the Board of Governors.

All staff are aware of the policies and procedures within the school. This is achieved through regular Child Protection Training, including Prevent awareness. Special attention is given to these matters in the induction of all new staff, including temporary staff and volunteers. Induction for new staff includes:

- The school safeguarding policy
- The identity and function of the Safeguarding Lead and Deputy
- All staff must read and understand *Keeping Children Safe in Education 2016 Part 1 and Annex A* and sign to acknowledge they have done so
- The school's code of conduct for staff (including the use of social media)
- The Whistle-blowing Policy

All staff are committed to the following principles of safeguarding:

- Confidentiality and appropriate security/access to records
- Clear and effective communication
- Centralisation of information, liaison with outside agencies
- Maintenance of secure records and registers
- Co-operation between individuals, departments and organisations
- Promoting an environment in which a child's development and health are promoted and in which ill-treatment is effectively tackled

The Safeguarding Lead recognises that there is an effective pastoral system already in place at Mount St. Mary's College; his/her role is to support this system. It is recognised that Heads of School (HOS) (or the Houseparents in the case of boarders) will be the active agents in most cases which involve sensitive pastoral care of a pupil.

### **Whistle-blowing**

Mount St Mary's College Trust and its Governing Body is committed to the principles and practices of openness, probity and accountability. In line with this commitment the Trust encourages all staff with serious concerns about any aspect of the Trust's work to come forward and raise their concerns without fear of being disloyal or suffering harassment or victimisation. The earlier the concern is raised the easier it is to take action and deal with the matter. This is a cornerstone of safeguarding and protecting the welfare of pupils. **All staff are expected to whistle-blow if they are concerned about the conduct of another member of staff towards our pupils and these concerns will be dealt with in a timely and appropriate way.**

The NSPCC runs a whistleblowing helpline on behalf of the Home Office. The number is 0808 800 5000.

The policy to which we work has been made available to all staff and is published on the website.

### **The Designated Safeguarding Lead**

In accordance with Annex B of *Keeping Children Safe In Education September 2016*, the main responsibilities of the Designated Safeguarding Lead are:

#### **Managing referrals**

- a) To take lead responsibility for promptly referring all cases of suspected abuse of any student at the School to children's social care.
- b) To take lead responsibility for referring to the Local Authority Designated Officer (LADO) all child protection concerns which involve a member of staff or volunteer.
- c) To take lead responsibility for making referrals to the Disclosure and Barring Service (DBS) where a member of staff is dismissed or has left due to risk / harm to a child.
- d) To take lead responsibility for making referrals to the police where a crime may have been committed.
- e) Liaising with the Headmaster in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the School.
- f) To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

#### **Raising awareness**

- a) Ensure this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- b) Ensure this policy is available publicly.
- c) Ensure that parents are aware that referrals about suspected abuse or neglect may be

made to children's social care and the School's role in this.

- d) Maintain links with the Derbyshire Safeguarding Children Board to ensure staff are aware of training opportunities and the local policies on safeguarding.
- e) Where children leave the School ensure their child protection file is copied for any new school or college as soon as possible. This will be transferred separately from the main student file, ensuring secure transit and confirmation of receipt will be obtained.
- f) In accordance with the Prevent Duty Guidance for England and Wales and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) the Designated Safeguarding Lead has, in addition, the following responsibilities:
  - acting as the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty
  - co-ordinating Prevent duty procedures in the School
  - liaising with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated
  - undergoing WRAP or other appropriate training
  - maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training and
  - monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty
  - regularly meet with the Headmaster, Deputy Head, Head of Boarding, School Nurse and other appropriate figures to discuss the welfare of the pupils

The Designated Safeguarding Lead has undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals in order to:

- a) Understand the assessment process for providing early help and intervention, eg through locally agreed common and shared assessment processes such as early help assessments.
- b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- c) Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff.
- d) Be alert to the specific needs of children in need, those with special educational needs and young carers.
- e) Be able to keep detailed, accurate, secure written records of concerns and referrals.
- f) Obtain access to resources and attend any relevant or refresher training courses.
- g) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them and to meet the requirements and procedures of the Derbyshire Safeguarding Children Board.
- h) To provide an annual review to the Board of Governors, which is signed off by the Chair of Governors

### **Instrumental Music Lessons**

The teaching of individual music lessons takes place in the music department. The doors to all of the practice rooms have windows. The timetable for each teacher's lessons is published on the departmental noticeboard and the Cross Campus Director of Music is kept aware of changes, extra lessons and any other alterations to the normal routine.

### **Physical Contact with pupils**

It is recognised that there may be occasions when it is necessary for physical contact between pupil and teacher in order to demonstrate a particular technique for example in music or sports lessons. The use of touch should never be to meet the adult's needs, but only those of the pupil. Teachers

should always have first attempted other methods of instruction (e.g. demonstration, verbal instruction); an explanation should always be given in advance of physical contact and permission asked of the pupil; if the contact involves an area other than, for example, the hands or lower arm (e.g. the throat in singing lessons) then another adult should be present. Physical contact should not involve the genital areas, breast, buttocks or other areas which may be uncomfortable or embarrassing. Physical contact should not cause pain or harm to the pupil and may not be used as a punishment.

Physical contact during sport must always be intended to meet the child's needs, not the adult's. The adult may only use physical contact if their aim is to:

- Develop sports skills or techniques
- To treat an injury
- To prevent an injury or accident from occurring
- To meet the requirements of the sport

The adult must explain the nature and reason for the physical contact to the child reinforcing the teaching or coaching skill. Unless the situation is an emergency, the adult should ask the child for permission.

The principles outlined above should be applied to all lessons. If a teacher is unsure about the use of physical contact then they should seek advice from the Safeguarding Lead in advance of the lesson.

### **Pupils**

Pupils are made aware of the procedures. A summary is in the Pupil Handbook and this policy is available online. The Safeguarding Lead, house staff, Heads of Line, teachers and tutors have a particular role in raising pupils' awareness. The school is concerned to help pupils be safe at all times and is particularly aware that safety is an important consideration, awareness of e-safety is encouraged through the PSHE programme and the Health Day. All staff are aware of the provisions in our Anti-bullying and ICT policies. The school has an appropriate filter system which ensures children are safe when accessing the internet at school.

Through the programme of assemblies, the provision of PSHE lessons and through the teaching of the values of St Ignatius the College seeks to encourage a respect for others and a love of service which strengthens pupils against radicalisation. The school should be a safe place where pupils can discuss and understand sensitive topics such as terrorism and extremist ideas that are a part of terrorist ideology, and learn how to challenge these ideas.

These measures are designed to encourage resistance to abuse, confidence to complain if necessary and an attitude in pupils that "it is right to tell."

It is important that the voice of pupils is heard and that pupils are confident in speaking to all members of staff. Pupils are made aware through assemblies, form time and PSHE that they should speak to trusted adults if they are unhappy or have concerns about other pupils.

The list includes, but is not exclusive to:

- Form Tutor
- Class teacher
- Head of School
- Houseparent
- Deputy Houseparent
- Sports Coach
- The Independent Listener
- The College's Supportive Listener
- The School Nurse

Captains who have been given positions of responsibility will also receive a briefing on safeguarding

issues and the appropriate action to take should they receive any allegation of abuse or notice signs of abuse.

### **The Muller Group**

The Muller Group is chaired by the Deputy Head (Pastoral) and includes the Safeguarding Lead and Deputy Safeguarding Lead, the Houseparents, the school Nurse and the Head of Learning Development. Heads of School attend by invitation. It meets weekly, reviews the minutes of tutor meetings and allows for the sharing of information regarding potentially vulnerable pupils. In discussions the Muller Group will be attentive to the context in which pupils live.

### **Vulnerable Pupils**

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

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

At Mount St Mary's we identify pupils who might need more support to be kept safe or to keep themselves safe by:

- sharing clear information with all staff via iSAMS
- form tutors meeting one-to-one with their tutees
- regular review of vulnerable pupils via the Muller Group

### **The College's Supportive Listener**

The Supportive Listener is available to all pupils. Pupils can be referred to her by members of staff who are concerned about a pupil's well-being. The Muller Group will review those requesting appointment and in consultation with the Supportive Listener will manage the appointment list. Typically students will be referred for a series of 6 appointments after which there will be a review. The Deputy Head Pastoral meets each week with the Supportive Listener.

### **Independent Listener**

As part of the pastoral system within the school the College has an independent listener who is available for the pupils to contact. This is member of the public situated close to the College but not connected with it. As with all College staff, independent listeners are subject to DBS clearance. The numbers on which the independent listener can be contacted are displayed around the college as is the number of Childline. Should any pupil have a concern they feel cannot be addressed through College channels they are able to contact the independent listener. Contact details are as follows:

<b>Mrs Mary Emmott:</b>	<b>07879 414266</b>
<b>Mr Chris Emmott:</b>	<b>07841 207085</b>
<b>Children's Commissioner, Anne Longfield, OBE</b>	<b>0800 528 0731</b>

### **The Safeguarding Lead and Health Staff**

Health Staff are governed by their own code of professional conduct and medical confidentiality is respected. The Safeguarding Lead may need to refer for advice to the health centre. Health centre staff are able to disclose to the Safeguarding Lead any incidents where a pupil is in danger of significant harm. Where there is liaison between health centre staff and the Safeguarding Lead, it will be the Safeguarding Lead who communicates with parents.

## Recognising Abuse

Because of their day-to-day contact with individual pupils, teachers and others working at Mount St. Mary's College are particularly well placed to observe outward signs of abuse, changes in behaviour or developmental problems.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**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.

**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.

**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.

*Keeping Children Safe in Education 2016* also acknowledges the following as specific safeguarding issues:

- children missing from education
- children missing from home or care
- issues around body image
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- forced marriage
- gangs and youth violence

- gender-based violence/violence against women and girls
- mental health
- private fostering
- preventing radicalisation (see section 3 below)
- sexting
- teenage relationship abuse
- trafficking

**Child Sexual Exploitation:** Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
  - Increasing secretiveness around behaviours; and
  - Self-harm or significant changes in emotional well-being.

**Potential vulnerabilities include:**

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;



- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

### **Female Genital Mutilation:**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

**Honour Based Violence:** So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

**Private Fostering:** a private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

### **'Peer on Peer Abuse'**

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting.

Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At Mount St Mary's we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil.
- is of a serious nature, possibly including a criminal offence.
- raises risk factors for other pupils in the school.

- indications that other pupils may have been affected by this student.
- indications that young people outside the school may be affected by this student.

If there are indications of significant harm the school would involve other agencies as with any safeguarding concern.

### **Sexual Violence and Sexual Harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

All staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. Sexual violence refers to sexual offences under the Sexual Offences Act 2003:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

#### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

**Sexual harassment** is defined as ‘unwanted conduct of a sexual nature’ that can occur online and offline.

Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos.
  - sexualised online bullying;

- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. All victims are taken seriously and offered appropriate support.

All staff are aware that sexual violence and sexual harassment is not acceptable and it is not to be tolerated or dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”.

If witnessed all staff will challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

All of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language.

Allegations of sexual violence or harassment will be handled according to the advice in ‘*Sexual Violence and Sexual Harassment between children in schools and Colleges*’ (May 2018).

All victims will be reassured and taken seriously when making a report. Whilst confidentiality cannot be promised the Safeguarding Lead will always attempt to protect the identity of any victim and give careful consideration to the impact of social media where appropriate.

Where there has been a report of sexual violence the DSL will make an immediate risk assessment which will be stored and reviewed as appropriate. In cases of sexual harassment this will be considered on a case by case basis.

Important considerations in the College’s initial response will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- is the alleged incident is a one-off or a sustained pattern of abuse?
- are there ongoing risks to the victim, other children, adult students or school or college staff?;
- other related issues and wider context.

All disclosures should be handled according to the procedure as set out in this policy.

### **Sexting**

In cases of ‘sexting’ we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: ‘Sexting in schools and colleges, responding to incidents, and safeguarding young people’.

In addition to the school's Acceptable Use Policy, the rules set out in the Student Planner and the school's Behaviour Policy and Anti-bullying policy these matters are addressed directly through the PSHEE programme and assemblies. This issue is addressed specifically in the safeguarding training for all staff.

### **Context and Safeguarding**

All staff must be aware that the context in which abuse occurs is highly significant. We must be sensitive to the fact that a child's context is far wider than their home and their school, including their peer group and neighbourhood, for example. We must be particularly attentive to the fact that as a boarding school with a body of international the students the contexts and cultures our students come from are varied and distinct. It is vital that we are attentive when listening to the children in our care for indications about their particular context and that we are alive to the possibility of risks and dangers to which they may be exposed. The students context will always be considered when dealing with safeguarding issues.

**Signs and Symptoms of Abuse:** the signs outlined below, and others, can do no more than give rise to suspicion – they are not in themselves proof that abuse has occurred. However staff should be alert to all such signs.

**If you suspect that a child is being abused or has indications of suicide or self-harm all staff MUST share this information with the Safeguarding Lead.**

#### **1. Emotional Abuse**

Children suffering from emotional abuse may exhibit these behavioural symptoms:

- Excessively clingy or attention-seeking behaviour
- Low self-esteem
- Apathy
- Be fearful or socially withdrawn
- Constantly seek to please
- Be over-ready to relate to anyone, even strangers
- Where emotional abuse is suspected, it is important to seek help for the pupil

#### **2. Neglect and delay in growth (failure to thrive)**

Warning signs include:

- Poor growth for which no medical cause is found, with a dramatic improvement on a normal diet away from home
- Unkempt, dirty appearance
- Medical needs of the child unmet – failure to seek medical advice for illness, missed medical appointments
- Developmental delay
- Lack of social responsiveness
- Self-stimulating behaviour such as head banging or rocking
- Repeated failure to prevent (accidental) injury

#### **3. Sexual Abuse Warning signs include:**

- Behaviour with sexual overtones
- Explicit or frequent sexual preoccupation in talk and play
- Sexually-provocative relationships with adults
- Hinting at sexual activity or secrets through words, play or drawings
- Sexual activity between very young people may be a sign that one or more of them have been abused

#### **4. General**

- Withdrawn, fearful or aggressive behaviour towards peers or adults
- Running away from home
- Suicide attempts or self-harming behaviours
- Child Psychiatric problems including behaviour problems, social withdrawal, onset of wetting or soiling, severe sleep disturbances
- Inappropriate displays of affection between child and carers e.g. flirtatious or seductive behaviour
- Learning problems or poor concentration (NB for some abused children school may be a haven: they arrive early, are reluctant to leave and perform well)
- Marked reluctance to participate in physical activity or to change clothes for Games etc.
- Physical Manifestations
- Pain on passing urine, recurrent urinary tract infections

#### **3. Physical Abuse**

All children incur bruising as part of their normal play and activities but warning signs include:

- Bruises (especially to soft areas e.g. thighs, upper arms and abdomen)
- Bites
- Scars
- Repeated fractures
- Regular shaped burns
- Some marks may seem insignificant by themselves but repeated injuries even of a very minor nature may be symptomatic.

#### **5. Child Sexual Exploitation**

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 do not take part in education.

#### **6. Female Genital Mutilation**

There are a number of factors in addition to a girl's or woman's community or country of origin that could increase the risk that she will be subjected to FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM.
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl withdrawn from Personal, Social and Health Education or Personal and Social Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

#### **INDICATIONS THAT FGM MAY BE ABOUT TO TAKE PLACE SOON**

The age at which girls undergo FGM varies enormously according to the community. **The procedure may be carried out when the girl is newborn, during childhood or adolescence, at**

**marriage or during the first pregnancy.** However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk. It is believed that **FGM happens to British girls in the UK as well as overseas** (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies. There can also be clearer signs when FGM is imminent: It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.

- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- Parents seeking to withdraw their children from learning about FGM.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

Further information regarding FGM is available in the Multi-Agency Practice Guidelines:

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

The NSPCC has a helpline dedicated to FGM: **0800 028 3550**

### **Radicalisation and the Prevent Duty**

As part of the Counter-Terrorism and Security Act of 2015 the School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism. The school is compliant with the *Prevent Duty Guidance, July 2015*.

The School aims to build students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The School is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The School has adopted the Government's definitions for the purposes of compliance with the Prevent Duty.

**Extremism:** "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"

**Radicalisation:** "the process by which a person comes to support terrorism and forms of extremism

leading to terrorism"

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology.

As with managing 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. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

*Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)* notes the following:

"36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- attempts to recruit others to the group/cause/ideology or communications with others that suggest identification with a group/cause/ideology 52.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology or condoning or supporting violence or harm towards others or
- plotting or conspiring with others

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other harms (eg drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. As with all safeguarding matters staff should refer concerns to the Safeguarding Lead.

The Department for Education has a dedicated line for advice to staff and governors: 020 7340 7264 [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

If you are concerned about possible terrorist or radicalised activity contact:

National Terrorism Hotline: 0800 789 321

Derbyshire Constabulary: 101

Inspector Karl Mortimer: [EMSOU-SB-Prevent@Derbyshire.PNN.Police.UK](mailto:EMSOU-SB-Prevent@Derbyshire.PNN.Police.UK)

Seamus Carrol (Derbyshire

CC): 01629 538494 or email [seamus.carroll@derbyshire.gov.uk](mailto:seamus.carroll@derbyshire.gov.uk).

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## SAFEGUARDING PROCEDURES

1. Make sure the child is not in need of immediate medical attention.
2. Report the matter immediately to the Safeguarding Lead.
3. Once a report has been received if there is any concern that a child is in need of help, or at risk, the Safeguarding Lead will, in accordance with Derbyshire Area Safeguarding Procedures, contact Children's Social Care Office by telephone immediately in order to make a referral (24 hour line 0845 6058 058).
4. If there is an allegation made against someone working or volunteering at the school then this must be reported to the Headmaster. In the Headmaster's absence it must be reported to the Safeguarding Lead who must keep the headmaster informed. The School will contact the Local Authority Designated Officer (LADO), Mr Miles Dent (01629 531 940; [professional.allegations@derbyshire.gov.uk](mailto:professional.allegations@derbyshire.gov.uk)), within at least one working day. The school will not investigate or seek the approval of parents before first speaking to the LADO. The school will not take any further action until the LADO has been consulted, unless the case is of sufficient gravity that the police must be informed immediately.
5. In the event that allegations or suspicions concern the Headmaster they must be reported to the Chair of Governors without informing the Headmaster. He will contact the LADO and no further action will be taken by the school.
6. Allegations of historic abuse must be reported to the Police. If the allegation concerns the period of time **before** the establishment of the independent Trust in 2007 then the headmaster must inform the Society of Jesus in the person of the Socius, Fr Paul Nicholson SJ ([socius@gbsj.org](mailto:socius@gbsj.org)). This is to allow the Society to fulfil its obligations to the charities commission and its insurers.

**If at any time there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Whilst the responsibility for making a referral rests with the safeguarding lead staff may make a referral to social services directly if they feel it is necessary.**

All staff should be aware of their right and duty to "whistle blow" in good faith without fear of disciplinary action or any other adverse effect in respect of their own personal and professional wellbeing.

### **If a child makes an allegation of abuse:**

- Reassure the child that he/she is doing the right thing and that he/she will be protected and helped.
- Clearly this is an area of great sensitivity. It would be best to seek a quiet, but not isolated spot where the child can speak freely. Whilst maintaining a sensible distance, it is often best to sit alongside rather than facing the child.
- You should not take notes whilst the disclosure is being made.
- **DO NOT MAKE ANY PROMISE OF CONFIDENTIALITY** – Explain that you will need to share the information with the Safeguarding Lead.
- If the child withdraws the allegations at this point you must still take further action. **DO NOT IGNORE OR KEEP THE MATTER TO YOURSELF**
- You should make contact with the DSL as soon as practical.
- Do not make an examination of the child.
- Do not cross-examine the child or ask leading questions.
- Do not contact the child's family but pass the matter on immediately to the Safeguarding Lead.
- In any case where there is an allegation or suspicion of abuse a written record must be made. This is not a pre-requisite to contacting the SL but must be done as soon as is practical. These notes must reflect as precisely as possible the actual words used by the child and should not be based on an adult interpretation of this. Notes should be timed, signed and dated by the person who has made them. Ideally "contemporaneous" notes should be made – that is the record should be made within one hour of the conversation with the child. Staff must fully

inform pupils that records are being kept. Any member of staff reporting a suspicion of abuse in good faith would not be liable to face disciplinary action or to suffer any adverse effect in respect of his/her own personal or professional wellbeing if, following investigation, the case is not taken further.

- Complete a concern form in writing (forms are available in the staff room, from the school office and from the headmaster's office).
- Take the concern form in person to the Safeguarding Lead or in his absence the Deputy Safeguarding Lead. If this is not possible take the concern form to the Headmaster's PA and ask her to contact the Safeguarding Lead.

### **Missing Pupils**

All pupils should be registered every morning, lunchtime and for after school activities. Tutors and teachers should take a register every lesson. If pupils are found to be missing the Headmaster's Reception should be informed immediately. Reception will be informed of any pupil who is resting in the health centre.

A search of the school building will be made for the pupil and in the case of boarders the boarding houses will be searched. There should be an attempt made to build up a picture of the pupil's movements. Some useful questions are set out below:

- a) When was he/she last seen?
- b) Who was he/she with?
- c) Where might he/she have gone?
- d) Has he/she signed out?
- e) Is there a School activity that he/she might be on?
- f) Has he/she been ill or injured and gone to the nurse or the Health Centre?
- g) What emotional state did he/she appear to be in?
- h) Has anything upset him/her recently?
- i) Did he/she speak to anyone about leaving?
- j) Who are his/her main friends at School?
- k) Does he/she have a mobile phone and what is the number?
- l) Does he/she have a special friend?
- m) Is there any reason to believe he/she might have been abducted? (e.g. family custody dispute; very wealthy/prominent parents.)

If the pupil cannot be found after 40 minutes the Head of Line and the Deputy Head (Pastoral) will be informed. They will decide whether or not the parents should be informed immediately.

If the child is not found after a further 60 minutes the police should be informed to see if they have any information as to the child's whereabouts. In most circumstances the parents should be informed at this point.

If no further information is ascertained, or the child is not found within a further 60 minutes then the Police are to be formally notified that the child is missing. At this stage, if they have not already been informed, the parents must be contacted.

A register of boarders should be taken in the morning, after supper and a check made at bed time. If a boarder is missing the Head of Boarding and Houseparent should be informed as soon as possible and the appropriate action taken.

Houseparents should keep a record of the mobile phone numbers of all the pupils.

A record must be kept of all such incidents by the SL for all pupils and by the HOB for boarding pupils only, including the action taken and the reasons given by the pupil for being missing.

## Children Missing from Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about child sexual exploitation.

We monitor attendance carefully and address poor or irregular attendance without delay.

In response to the guidance in Keeping Children Safe in Education (2018) the school has:

1. Staff who understand what to do when children do not attend regularly
2. We have two emergency contacts for each pupil
3. Where pupils miss school for an extended period (more than 2 days) without good reason there will be a home visit from the pastoral team.
4. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
5. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards);  
or
  - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Named person for CME:

Dave Wallace, Principal Education Welfare Officer

Tel: 01629 536521

Marilyn Simcock, Co-ordinator for Missing Children

Tel: 01629 536520.

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## SAFEGUARDING/ SAFEGUARDING CONTACTS

Designated Safeguarding Lead

Mr Jack Murphy, Deputy Head (Pastoral)  
07833 051 481  
[jmurphy@msmcollege.com](mailto:jmurphy@msmcollege.com)

Designated Safeguarding Lead

Mr Chris McAllister, Deputy Head (Academic)  
07833 051 475  
[cmcallister@msmcollege.com](mailto:cmcallister@msmcollege.com)

Chair of Governors	Fr Adrian Porter SJ <a href="mailto:aporter@msmcollege.com">aporter@msmcollege.com</a>
Headmaster	Dr Nicholas Cuddihy <a href="mailto:ncuddihy@msmcollege.com">ncuddihy@msmcollege.com</a>
Governor	Mrs Marian Bolton <a href="mailto:governors@msmcollege.com">governors@msmcollege.com</a>
Independent Listener	Mrs Mary Emmott (07879 414266) <a href="mailto:mary.emmott@immaculate-derbyshire.co.uk">mary.emmott@immaculate-derbyshire.co.uk</a> Mr Chris Emmott (07841 207085)
Supportive Listener	Miss Mary-Jo Kelly <a href="mailto:mkelly@msmcollege.com">mkelly@msmcollege.com</a>

The following people are responsible for ensuring safeguarding induction/ training is delivered across the Trust:

#### **DESIGNATED SENIOR PEOPLE**

BHS	Mrs Karen Keeton	Headteacher
MSM	Mr Jack Murphy	Deputy Head (Pastoral)

#### **DEPUTY DESIGNATED SENIOR PEOPLE**

BHS	Mrs Sonya Dayson	Head of EYFS
BHS	Mrs Rachel Cockell	Nursery Manager
MSM	Mr Christopher McAllister	Deputy Head (Academic)

#### **DESIGNATED GOVERNOR**

Mrs Marian Bolton	
MOUNT ST. MARY'S COLLEGE	01246 433 388
BARLBOROUGH HALL SCHOOL	01246 810 511

The contact details provided below are for use in relation to children in need of help or who are the focus of concern, this includes alleged abuse **unless by an employee/volunteer at the school in which case the LADO should be called.**

CALL DERBYSHIRE*	01629 533190
NSPCC WHISTLE BLOWING	0800 800 5000
DERBYSHIRE POLICE	0345 123 3333
HEALTH	01773 599410
	01629 531940
DERBYSHIRE LADO	<a href="mailto:professional.allegations@derbyshire.gov.uk">professional.allegations@derbyshire.gov.uk</a>

National Terrorism Hotline: 0800 789 321  
CHILDREN'S COMMISSIONER, ANNE LONGFIELD, OBE 0800 528 0731  
DERBYSHIRE SAFEGUARDING CHILDREN BOARD 01629 532181  
Derbyshire Constabulary: 101  
Inspector Karl Mortimer: EMSOU-SB-Prevent@Derbyshire.PNN.Police.UK  
Seamus Carrol Derbyshire CC  
Prevent 01629 538494

\*Call Derbyshire is the contact number for Derbyshire County Council. Their staff will direct you to the appropriate department. This is the number to call if you wish to make a social services referral, but can be used to access any service.

Policy Reviewed: September 2018	SL: J F Murphy	SL: Karen Keeton	Governor:	Next Review: September 2019
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