

Safeguarding Policy

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This policy specifically applies to all areas of the School including the EYFS.

This policy is reviewed, authorised and approved annually, as a minimum, by the Board of Governors and updated as needed on an interim basis by the Designated Safeguarding Lead and Bursar.

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- Updated from version 201609.03 with change to EYDSL.

Next Board review scheduled for: July 2018

Introduction

The safeguarding and promotion of the safety and welfare of every pupil at Edge Grove is a fundamental aim of the school and is the responsibility of everyone within the School organisation. It is the responsibility of the Governors to ensure not only that appropriate arrangements are in place to support staff in the execution of that responsibility but also that staff have an involvement in the shaping of policies and procedures. This is achieved partly through the development of an ethos in which children feel secure and that their viewpoints are valued; also that they are encouraged to talk and are listened to and partly through the policies and process of safer recruitment and subsequent regular training in safeguarding for all staff, agency staff, peripatetic staff, volunteers and Governors.

We recognise that the school plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

All children have the right to be protected. People who abuse children can be from any section of society, often appearing quite ordinary, respectable and caring. This makes it very difficult for the children they abuse to be believed. Within a professional, close society such as Edge Grove, where people dedicate their lives to caring for and educating children, it can be difficult to appreciate that some people might neglect or seek to harm children, even their own, or to use them for their own sexual gratification. Teachers and other school staff are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop, because they have daily contact with the children. The school recognises its important role in the early recognition of the signs and symptoms of abuse or neglect and the appropriate referral processes. The School ensures that arrangements are made to safeguard and promote the welfare of all pupils at the School and that such arrangements both comply with statutory requirements and also have due regard to any further guidance issued by the Secretary of State.

Related policies and reference documents

Key reference publications and documents relating to the school's Child Protection procedures include:

External

- Keeping Children Safe in Education (DfE statutory guidance revised for September 2016) (KCSIE)
- Hertfordshire Safeguarding Children Board's (HSCB) Child Protection Procedures – as amended and updated online at <http://hertsscb.proceduresonline.com/index.htm>
- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (updated in 2015 by DfE)
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE publication March 2015)
- What to do if you're worried a child is being abused – Advice for practitioners (DfE publication March 2015)
- Protection of Freedoms Act 2012
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Education Act 2002 – Section 157
- Education and Skills Act 2008 – Section 128
- Children's Act 1989, as amended by the Care Standards Act 2000, and 2004
- Education (Independent Schools Standards) (England) Regulations 2014
- Counter-Terrorism and Security Act 2015 – Section 26 – known as the "Prevent duty"

Internal

- Behaviour Management Policy
- Anti-Bullying Policy
- Disability & Accessibility Policy
- Health & Safety Policy
- Admissions Policy
- Data Protection Policy
- Safer Recruitment Policy
- Whistle Blowing Policy
- Employment Manual: Disciplinary Policy
- Employment Manual: Staff Code of Conduct & Safeguarding Children Safe Working Practice
- Critical Incident Plan
- Policy on Adults Staying with Boarding House Staff
- Policy on Taking, Storing and Using Images of Children
- eSafety Policy
- PSHE Curriculum & Schemes of Work
- Security Procedures
- Missing Pupil Policy
- Staff Handbook
- Guidance in addressing Pupil Concerns
- Guidance on Carrying Pupils in Staff Vehicles
- New Staff Induction Policy
- EYFS Intimate Care Policy
- Pre Prep Injury Declaration

Aims

The aim of this policy is to provide a focus that will minimise harm, or risk of harm, and specify the actions required to be taken in response to various situations, in the form of clear procedures of which all staff must be made fully aware. All members of staff have a responsibility to ensure that children in their care are not harmed. There is no legal duty to report suspicions of abuse. However, there is a professional obligation to do so, and in extreme cases - particularly as a boarding school - a lack of action could constitute criminal neglect.

All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy. This includes a duty both to children in need and to children at risk of harm. All staff should read at least Part 1 of KCSIE and School leaders and those staff that work directly with children should also read Annex A which contains important additional information about specific forms of abuse and safeguarding issues. The School has a duty to ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in this guidance. All school staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

The policy follows DfE, IAPS, BSA and HSCB guidelines with the specific objectives of:

- Informing all staff, parents and governors about the school's responsibilities.
- Enabling everyone to have a clear understanding of how these responsibilities should be carried out.
- Implementing, as necessary, the procedures contained in the HSCB Child Protection Procedures – a guide to procedure and practice for all professional staff in Hertfordshire who work with children.
- Adhering strictly to the School's policy on Safe Recruitment which itself complies with the Regulations for Independent Schools and the external policies and references noted above.
- Assessing the likelihood of pupils being drawn into terrorist organisations including extremist ideas, to demonstrate an understanding of the risks and how to identify children who may be at risk of radicalisation and what to do to support them.

The policy covers all types of abuse – physical injury, physical neglect, emotional and sexual (see definitions and indicators of abuse at Appendix 2). The school has a separate Anti-Bullying Policy. The policy includes

consideration of the requirement to safeguard and promote the welfare of children who are in need as defined by the Children's Act 1989. The policy includes guidance on the Prevent Duty required of all schools under the Counter-Terrorism and Security Act 2015.

The policy is reviewed regularly and updated and amended as necessary in light of variations to regulation, legislation or best practice and will, in particular, be formally reviewed by the Designated Safeguarding Lead (see below) following the discovery of any Child Protection issue with any deficiencies or weaknesses being remedied immediately without delay.

The policy has been drawn up in accordance with the Hertfordshire locally agreed inter-agency procedures and the School works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

The full Governing Body undertakes an annual review of School policies and procedures relating to Child Protection along with the efficiency of their execution. This review is formally and comprehensively minuted.

It should be noted that:

- i) Reference to "boarders" in the policy includes all children who are accommodated at the school (e.g., overnight accommodation of non-boarders and of children not educated at the school).
- ii) The policy extends to off-site accommodation arranged by the school (e.g., for activity weekends).
- iii) For the purpose of this policy the term "staff" includes all volunteers and temporary/agency staff whether directly employed by the School or through a contractor.

Child Protection Appointments

The school's Board of Governors is appointed to exercise non-executive responsibility for Child Protection matters. The Board ensure that the School designates an appropriate senior member(s) of staff to take lead responsibility for child protection. They should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

Within the school executive, the Deputy Head (Pastoral) is appointed Designated Safeguarding Lead (DSL), with specific responsibility for all Child Protection matters in the school. A Deputy Designated Safeguarding Lead (DDSL) is also appointed to deputise for the DSL in the latter's absence. In the EYFS, a Designated Safeguarding Lead (EYDSL) is appointed to have responsibility for the Early Years and to whom concerns in that area of the school should be addressed. The DSL is responsible for being the School's representative for Inter-Agency working and this will include, where appropriate, contributing to a coordinated offer of "early help".

The responsibilities and expectations of all 3 Safeguarding appointed roles are contained in job descriptions with which the post holders are provided and these ensure that sufficient time and resource are allocated to the post holders to facilitate the full operation of these roles.

The Head is responsible for ensuring that all staff receive and read Part One of the DfE guidance "Keeping Children Safe in Education" and also that they are aware of and abide by the School's safeguarding policies and procedures. All staff, including temporary staff and volunteers, are briefed by the DSL which includes explanation of how staff can best understand and therefore discharge their duties under KCSIE. Staff are also required to undergo appropriate training in Safeguarding at time of employment (if not already held); the School provides a triennial certification for all staff. This is supported by mandatory online refresher training and Inset sessions which focus on the application of generic policies and procedures to this School. An annotated copy of Part One of "Keeping Children Safe in Education" is issued to all new staff as part of their induction and staff are required to confirm that they have read and understand their responsibilities under the guidance.

Staff must address all matters relating to Child Protection directly to the DSL or, in the DSL's absence, the DDSL (but see also Allegations involving School Staff); under no circumstances should such issues be discussed with any other adult or child. Yearly contact should be made by the DSL and EYDSL with the Hertfordshire CP Schools Liaison officer (01992 588757) to confirm contact details. The names of the 3 above appointees are shown at **Appendix 4**.

Explanatory Note: The EYDSL is specifically appointed to take the lead in safeguarding for the Early Years Foundation Setting. In all other areas of the School, the DSL takes the lead and the DDSL is appointed as

his/her deputy and to act in lieu of the DSL. Whilst the activities of the DSL may be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL; this lead responsibility may not be delegated. In this document the initials DSL are taken to include the DDSL and EYDSL as appropriate but with the proviso just noted.

Role of the Designated Safeguarding Lead

The broad areas of responsibility for the DSL are:

Managing referrals

- Refer all cases of suspected abuse to HSCB and:
 - The designated officer(s) for child protection concerns (all cases which concern a staff member),
 - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
 - Police (cases where a crime may have been committed).
- Liaise with the Head to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- 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.
- Refer cases to the Channel programme where there is a radicalisation concern as needed and support staff who make referrals to the Channel programme.

Training

- The DSL should receive appropriate training carried out, as a minimum, every two years in order to:
 - Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
 - Ensure each and every member of staff (especially new and part time staff) has access to and appreciates their role within the school's child protection policy and procedures and also their responsibilities under Part One of KCSIE,
 - Be alert to the specific needs of children in need, those with special educational needs and young carers.
 - Be aware and understand that schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Ensure the School has clear procedures in place for protecting children at risk of radicalisation.
 - Be able to keep detailed, accurate, secure written records of concerns and referrals.
 - Obtain access to resources and attend any relevant or refresher training courses.
 - Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raising Awareness

- The DSL should ensure the school's policies are known and used appropriately:
 - Ensure the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governors regarding this.
 - Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
 - Link with the HSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding including those related to the areas of Prevent/radicalisation, Female Genital Mutilation and children missing education.
 - Provide advice and support to other members of staff on protecting children from the risk of radicalisation (Prevent Duty) and working with staff to help them understand when it is appropriate to make a referral to the Channel programme.
 - Liaise with the IT Manager to ensure that appropriate internet filtering and access restrictions are in place at all times to satisfy, as a minimum, the requirements of Annex C of KCSiE and to ensure an effective approach to online safety that empowers the School to protect and educate the whole

school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

- Ensure that the School's provisions for pastoral care including the schemes of work for PSHE include the teaching of general online safety as well as the use of mobile technology to all pupils.
- Where children leave the school ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Specific responsibilities for the DSL include:

- During term time the DSL and or a deputy should always be available (during school hours) for staff to discuss any safeguarding concerns. Where these staff are physically not present on the School site then contact may always be made via published mobile phone numbers – see Appendix 4 and Child Protection Wallet cards
- Being fully conversant with the procedures detailed in HSCB's Child Protection Procedures at <http://hertsscb.proceduresonline.com/index.htm> and being registered with HSCB for email alerts regarding updates to the procedures.
- Holding a copy of and being conversant with the DfE publication Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (updated in 2015 by DfE).
- Receiving training in Child Protection and Inter-Agency Working at the appropriate level every two years and ensuring that the Head & all members of staff (academic and support) at the School receive training at the appropriate level every three years. All training will be provided by either HSCB or an appropriate agency.
- Undertaking Prevent awareness training.
- Briefing the school staff in all areas of the school on the relevant contents of the guidance and procedures the school should follow as specified in these documents – including the training of new staff as part of their induction at the school.
- In conjunction with the Compliance Officer, maintaining a register of all training for staff in Child Protection including the content and duration of all training and inductions.
- Consulting with HSCB whenever a concern is raised.
- Taking prompt action to contact HSCB (Children's social care) and the Police (if a criminal matter)
- Ensuring that accurate records relating to individuals are kept in a secure place and marked "Strictly Confidential".
- Submitting reports for, and attending, Child Protection and Inter-Agency conferences as required.
- Ensuring that the school effectively monitors children who have been identified as "at risk".
- Ensuring that the school effectively provides for children in need (defined under Section 17(10) of the Children's Act 1989 as: "those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children") and is able to contribute a co-ordinated offer of early help.
- Monitoring the completion and retention of Pupil Injury Declarations in the Pre Prep department.

Minimising Risk

Staff

All staff should be aware of the risks of abuse (by adults and other young people) and take steps to reduce those risks. It is most important that all staff are provided with the relevant skills and knowledge to effectively safeguard the children in the School's care.

The recruitment of all staff for work within the school will be carried out strictly in accordance with the school's recruitment and selection policies (see published Safer Recruitment Policy which details all checks made and recorded), which are designed to minimise the risk of unsuitable appointments being made. All Staff, including the Head, will receive Safeguarding training at the appropriate level (Level 1) on a three yearly cycle and this will be supplemented by the provision of updates and /or online training for all staff and this will include briefings on changes to guidance and/or legislation as required.

New staff (including temporary staff, non-employed peripatetic staff, activity leaders and volunteers) will receive training from the DSL and/or an online module as appropriate as part of their induction process. Individual staff may also be trained to higher level of certification dependent upon their role within the School.

Prevent Duty: The School has robust procedures in place to help protect children who may at risk of radicalisation and these include the 4 general themes highlighted in the statutory Prevent guidance of **risk assessment, working in partnership, staff training and IT policies:**

It is important that staff are trained on how to identify factors that can help make people vulnerable to radicalisation. This may include, for example, monitoring all pupil absences and promptly addressing concerns about irregular absence with the parent or carer. As part of Prevent, staff may receive appropriate focused training to support the ever changing landscape of safeguarding which is underpinned by legislation and guidance on issues such as radicalisation. In particular the DSL will receive appropriate training as detailed above to ensure that all staff are made aware of their responsibilities in this area.

The School will work with partner agencies to seek advice, support and guidance drawing on multi-agency expertise, to support pupils at risk of harm via social media and the use of the internet. As appropriate, the School will consider engagement with parents and carers to assist families who raise concerns and provide them with appropriate support.

Missing Pupils: The School has put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future and will inform HSCB of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the School does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The School will inform HSCB of any pupil who fails to attend school regularly or who has been absent without the school's permission for a continuous period of 10 days or more or a period agreed with HSCB.

Referral into the Channel programme: Training will be provided to staff to ensure that they are aware of when a referral should be made by the School into the Channel programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

Female Genital Mutilation (FGM): comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences and statutory safeguarding responsibilities apply equally to FGM as to any other area of risk. School staff will be provided with appropriate briefings on this.

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines (available in the Child Protection Library on Firefly), and Chapter 9 of those Guidelines (pp 42-44) focuses on the generic role of schools and colleges.

If staff have a concern relating to FGM or regarding the potential for FGM to take place, they should activate local safeguarding procedures, using the existing protocols in this policy for multi-agency liaison with police and children's social care. Where a members of staff discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police (see also Appendix 4).

Recruitment Checks & Contractors: Staff working for outside providers/contractors will be subject to pre-employment checks; employers requested to provide proof of these checks and reviews of their appropriate

policies and to provide appropriate training in child protection for their staff; these checks, training and record keeping will be a condition of the providers/contractors' contract or agreement with the School.

All staff working at the School, whether directly or indirectly employed, are required to disclose any convictions, warnings, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the School).

Under the provisions of KCSIE and the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009, all child facing staff involved with children in Early Years and in later years with activities for children up to the age of eight, will be required to complete a Suitability Declaration prior to commencing employment and thereafter annually at the start of each academic year; any person 'disqualified' or 'disqualified by association' may not work in these settings. Any staff disqualified under the 'by association' rule may apply to Ofsted for a waiver of disqualification but will be suspended until such time as a waiver is confirmed. The School will notify Ofsted of any information that may lead to the disqualification of a member of staff as soon as is reasonably practical but at the very latest within 14 days of discovery.

Staff training: Staff will be trained to:

- Recognise and understand the importance of Safeguarding policies and procedures at Edge Grove.
- Never think abuse of any kind is impossible at Edge Grove or that an accusation against someone they know well and trust is bound to be wrong.
- Be aware of the fact that abuse is often perpetrated by children on other children and how to recognise this abuse.
- Never blur the line between professional and personal life. This needs special attention in a boarding school where staff and pupils live and spend large amounts of time together.
- Be aware of the types of abuse that children may be subjected to possible signs or indications of abuse – see Appendix 2.
- Identify children and young people at risk of radicalisation (Prevent Duty)
- Understand the fact that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
 - communication barriers and difficulties in overcoming these barriers.

The School's intranet (Firefly) contains a library of all relevant safeguarding legislation and documentation and is available to all staff and the location and contents are given to all new staff as part of their induction.

Induction training for all new staff will include guidance on the contents of this policy and the school's general safeguarding arrangements, the importance of reading and noting Section 1 (and, as appropriate, Annex A) of KCSIE, the requirements of the Staff Code of Conduct contained within the Staff Handbook, the protection offered to all staff under the School's Whistleblowing Policy, and the names and roles of the designated safeguarding appointments within the School. Every effort is made to ensure that all personnel on the school site are aware of and abide by the policy and procedures for safeguarding at Edge Grove and this includes provision for those staff for whom English may not be their first language and checks will be made to ascertain levels of understanding as part of induction.

Staff need to be aware of how they should interact with pupils. The current climate of suspicion with regard to child abuse poses a dilemma for caring adults. This is particularly true in boarding schools like Edge Grove where pride is taken in fostering a family atmosphere. In order to protect children from abuse - and staff from suspicions of abuse - the natural inclination to comfort and reassure children through physical contact has to be tempered by a pragmatic assessment of each situation.

This does not mean that physical contact is never permissible but there must be limits, and contact outside of those limits must be justified if necessary. Limits will vary according to the particulars of each situation, the age of the child and the role of the member of staff. Staff should refer to the EYFS Intimate Care Policy, the principles of which apply equally to caring for children older than those in early years.

The following guidance is offered as a starting point for further development through staff training. Staff should:

- Try, as far as possible, to avoid being alone in a room with a child. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Doors to rooms where one-to-one sessions are taking place should have a glazing panel or be left ajar. Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint. Remember you may need to have to justify your actions in all circumstances.
- Ensure that excursions out of the school, especially residential excursions, are supported by a sufficient number of adults to provide proper supervision. See the School's Health & Safety Policy Appendix regarding Educational Visits
- Not give children the opportunity to be in one-to-one contact with persons who may not have the requisite security clearances.
- Be aware that any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL & Head who will decide what to do next. Staff should refer to the School policy on the use of force to control or restrain a pupil.
- Never make demeaning or salacious remarks in the presence of children. Remarks about a child's physical characteristics or development could fall into this category.
- Avoid transporting children in their own vehicle. In exceptional circumstances, which should be assessed and sanctioned in advance by the Head or DSL, the child must travel on the back seat. No pupil should travel alone with a single member of staff.
- Exercise caution in electronic communication with pupils. Staff should not give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by text message or personal email. If they need to speak to a pupil by telephone, they should use one of the school's telephones and email using the school system. The group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her. The school mobile should be used for any contact with pupils that may be necessary. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any staff numbers that they may have acquired during the trip.
- Never allow any pupils to become "friends" on social media until the pupil has reached 18 years of age
- Be aware of the School's policy on the use of Mobile phones and cameras – see Appendix 3 below.
- Be aware of the School's EYFS policy on Intimate Care. Although primarily intended to provide guidance for dealing with children of the EYFS age range, the same principles apply when dealing with any child of any age and staff should be familiar with and guided by these principles.
- Be aware that, under the provisions of the Sexual Offences Act 2003 (came into force 1 May 2004 updated 2007), it is an offence for a person aged 18 or over intentionally to behave in certain sexual ways* in relation to a child aged under 18, where the adult is in a position of trust in respect of the child. The offence includes all children under 18.
 - *sexual ways includes
 - Sexual activity with a child - e.g. kissing, sexual touching, intercourse (section 16 SO Act)
 - Causing or inciting a child to engage in sexual activity (s17)
 - Sexual activity in the presence of a child (s18)
 - Causing a child to watch a sexual act (s19)
- Share any concerns with the Designated Senior Person, where there is a suspicion of a child becoming inappropriately attached to them or another member of staff or voluntary helper.

Pupils

Children and young adults often tell other young people about abuse, rather than staff and adults. Prefects will be made aware of how to respond if they are told of abuse or suspected abuse. In addition, systems will be put in place by the School to:

- Ensure that all children are aware of what they can do if they are upset or have a worry. This is disseminated through the “HELP” leaflet with the ‘Circle of Care’ which is displayed around the school and in the boarding accommodation. The contents and tone/nature of this document are explained to pupils in tutorials, emphasising the options open to them for communication of all problems to someone who will listen and help. The role of the Independent Listeners are emphasised as an independent ‘ear’ for all pupils.
- Ensure that all pupils know the school policy on bullying.
- Discuss with the pupils issues such as times of day or week, or locations in school, that are high risk for bullying/illicit activities.
- Use the PSHE and IT curriculums to help cover these issues.
- Ensure that pupils are made aware through both formal and informal processes including PSHE schemes of work, IT curriculum and tutor time, in an age appropriate manner of issues regarding safeguarding, e-safety and the dangers of radicalisation.

School Procedures (see separate procedure below for allegations involving any member of the School staff)

- All school and college staff should be prepared to identify children who may benefit from early help (detailed information on early help can be found in Chapter 1 of Working together to safeguard children). Early help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment.
- If any member of staff is concerned about a child being either in need or at risk he/she must inform the DSL or, in the EYFS, the EYDSL. Staff may always report concerns (see below) directly to HSCB using the contact details below and in Appendix 4; in this event staff should also notify the DSL as soon as possible unless the allegations involve a member of staff. Staff may also contact the NSPCC whistleblowing helpline on 0800 0280285.
- The member of staff must record the circumstances of their concerns in writing within a working day and preferably on the same day.
- The written record of any circumstances may be in any format as the individual member of staff deems to be appropriate provided always that the pertinent facts and opinions are adequately recorded. Staff may wish to use the “Logging a Concern” form – see Appendix 5. Regardless of format, any copy they keep for their own records MUST be kept confidentially and must not be made available outside the reaches of this policy.
- The DSL will refer the matter to HSCB (Children’s Social Care) immediately by phone and this will be done without prior discussion with the parents. A written report of the concerns will be submitted to HSCB within 24 hours.
- In cases involving the EYFS, the DSL or the EYDSL will also ensure that Ofsted is notified within 14 days.
- The attendance and development of any child who has been identified as “at risk” or who has been placed on the Child Protection Register will be monitored closely by the DSL.
- If a pupil who is known to be on the Child Protection Register changes school, the DSL will inform the LCSB responsible for the case, make appropriate arrangements for the secure transfer the appropriate records (separately from any other pupil files) to the receiving school and obtain a receipt for the transferred file.

When to Be Concerned

If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed, as soon as possible, that a referral has been made.

Staff should be concerned about a pupil if he or she:

- Has any injury which is not typical of the bumps and scrapes normally associated with children's injuries
- Regularly has unexplained injuries.
- Frequently has injuries (even when apparently reasonable explanations are given).
- Appears confused or gives conflicting explanations on how injuries were sustained.
- Exhibits significant changes in behaviour, performance or attitude.
- Indulges in sexual behaviour which is unusually explicit and/or inappropriate to his/her age.
- Discloses an experience by which he/she may have been significantly harmed.
- Is felt to be at risk of radicalisation.
- Is felt to be at risk of FGM being carried out or may have already been carried out.

Further guidance on the symptoms of abuse is at Appendix 2 and in Annex A of KCSiE.

Immediate Action Responses

Members of staff who suspect, or are told, that abuse may have occurred, should act immediately, applying the following key principles:

1. Always **stop** and **listen** straightaway to someone who wants to tell you about incidents or suspicions of abuse. Do not display shock or disbelief.
2. Accept what is being said.
3. Allow the child to talk freely.
4. Make brief handwritten notes in ink of what the child is telling you while he/she is speaking (or as soon as possible afterwards). Keep these notes in a secure place, under lock and key: it is what you wrote at the time that may be important later, not a tidier, improved version of it (see - Record Keeping, below).
5. Reassure the child but do **not** give a guarantee that you will keep what is said confidential or secret. You have a responsibility to tell the right people to protect the child. Explain that you need to tell the people who can sort it out, but you will **only** tell people who absolutely have to know (see Confidentiality, below).
6. Reassure the child that what has happened is not his/her fault.
7. Stress that it was the right thing to tell.
8. Do not ask leading questions that might give your own ideas of what might have happened (e.g., "did he do X to you?" Ask questions like "what do you want to tell me?" or "is there anything else you want to say?" Do not criticise the alleged perpetrator.
9. Tell the child what has to be done next and who has to be told.
10. Immediately tell the designated DSL or EYDSL (but see also Note to Allegations Involving School Staff, below); do not tell other adults or young people what you have been told.
11. Discuss with the DSL or EYDSL whether there are any steps that need to be taken to protect the person who has told you about the abuse.
12. **Never** attempt to carry out an investigation of suspected abuse by interviewing people. Staff from HSCB and the police are trained to do this - you could cause damage and prejudice possible criminal proceedings.
13. Where there are evident signs of physical injury, that may (or may not) be the result of abuse or bullying, medical help should be summoned, or the pupil should be taken to the surgery. In serious cases, the police should be informed from the outset.

14. As a person who works with children, all members of staff have a duty to refer safeguarding concerns. This is normally through the Designated Senior Person, however all staff have the right to make a referral to social care directly. This is particularly appropriate to, but not limited to, cases where:

- concerns are not taken seriously by an organisation (although staff raising a concern should be aware that action may be in progress and that no report back on an allegation will necessarily be made) or
- action to safeguard the child is not taken by professionals and
- the child is considered to be at continuing risk of harm

Staff should speak to the DSL/EYDSL or the Head (where the allegation involves a member of staff) or the Chair of Governors (where the allegation involves the Head) or contact Hertfordshire Children's Services (including out of hours) on 0300 123 4043.

Role of school medical staff

Health professionals in a school operate within their own professional guidelines, which include an obligation to refer cases of abuse to the DSL/EYDSL and/or the Head.

Parents

In general, we believe at Edge Grove that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with them. However, parental consent is not required for a referral to statutory agencies where there are concerns about a child's safety and it may not be right in such cases to immediately inform them of our concerns as that action could prejudice any investigation or place the child at further risk. In such cases, advice will be sought from the HSCB.

Recovery Plan for Children or Staff

Dealing with a disclosure from a child, and a Child Protection case in general, is likely to be a stressful experience. The member of staff involved should consider seeking support for him/herself and discuss this with the DSL or EYDSL.

As every case will be handled confidentially, any child should be able to continue at the school certain that any incident is not general knowledge. The same will apply for a member of staff when resuming work after an accusation (see Allegations Involving School Staff, below). Ongoing counselling will be offered and organised through the DSL and Head as required.

Record Keeping

When a child has made a disclosure to a staff member, the latter should:

- Ascertain 'who, what, when, where'
- Make brief handwritten notes in ink during or as soon after the conversation as possible.
- Not destroy the original notes in case they are subsequently needed by a court.
- Record the date, time and place of the conversation.
- Record any noticeable non-verbal behaviour and the words used by the child.
- Draw a diagram to indicate the position of any bruising or other injury. Notwithstanding this requirement, staff should only view parts of the child's body which are normally visible.
- Record actual statements and observations rather than interpretations or assumptions.
- Remember **not** to ask leading questions and **never** to try to interview people.
- Ensure that all documentation and records relating to the discussion are carefully secured under lock and key.

Confidentiality

All staff at Edge Grove, both in the teaching and non-teaching roles, have a responsibility to share relevant information about the protection of children but that process must follow the strictest standards of confidentiality. As a general rule, emails sent to a number of parents should not include the names of individual pupils and parents should be 'blind-copied' into the email

Pupils who have a problem may speak to someone whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. A pupil who is insistent upon confidentiality should be referred to an external source, such as ChildLine (details are given in the Circle of Care for pupils on which is displayed in the Pupil Planner and on notices around the school). If the pupil is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. The adult should provide the DSL, or EYDSL with a written account of what has transpired as a matter of urgency.

Allegations Involving School Staff

It is essential that any allegation of abuse made against a teacher or other member of staff (including DSL, DDSL, EYDSL and Head) or volunteer is dealt with fairly, quickly and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation.

If a child or parent makes a complaint about a member of staff or when any member of staff has reason to suspect that a pupil may have been abused by another member of staff, either at school or elsewhere, the member of staff must follow the procedures laid down in the Whistle Blowing Policy by immediately informing the Head or, in his unavailability or involvement, the Chair of Governors or, in their unavailability, the Governor with responsibility for Staff Welfare. The School will, at all times, comply with the requirements of the Protection of Freedoms Act 2012 when making a referral to DBS.

If the School is given information that suggested that a member of staff was abusing a child who was not a pupil at Edge Grove, that information must be treated as if the child was a pupil at Edge Grove as above. The LADO will be contacted immediately and the Head would then interview the member of staff and formally advise him/her of the allegations, making it clear that the school would not play any part in the investigatory process. He or she would be advised of the possibility of facing suspension, re-assignment to other duties etc in exactly the same way as if the allegation had involved an Edge Grove pupil. If the allegation subsequently proved to be unfounded, he or she would be given full support by the school in resuming his/her career.

Contact details for Governors are available through the Bursar (who will make them available to staff without comment or query), as these are not routinely published in public documents. Names of individuals are given below in Appendix 4.

He/she should also make a record of the concerns including a note of anyone else who witnessed the incident or allegation. Any member of staff making such an allegation must be reassured that the allegation will be handled in strict accordance with the School's Whistle Blowing Policy and that, provided the allegation has been made in good faith, the staff member will be protected from victimisation or harassment under that policy.

The Head will make an immediate referral to the LADO for any allegations involving adults and to HSCB for allegations relating to outside school or by pupils by phone and follow this within 24 hours with a written report. In cases involving the EYFS, the DSL or the EYDSL will also ensure that Ofsted is notified within 14 days of any allegations of abuse involving any adult working or volunteering or governing at the school. In making the referral, the Head may decide to consult with the DSL who possesses a higher level of child protection training.

The school will assess the viability of the member of staff under allegation remaining at work during the investigation through risk assessment and may make alteration to his/her job description or function in the school or may, if the situation requires, suspend the member of staff on full pay pending determination of the case. If the member of staff under allegation is normally resident in the boarding house, the School will provide alternative accommodation outside the School grounds until such time as the investigation is concluded. At all times the School will maintain an open mind and keep the member of staff apprised on the progress of the investigation.

If, after referral to, and investigation by the Local Authority and/or police, those bodies decide there is no further action necessary or the case is unproven, the school will internally investigate the circumstances of the situation and may take action under the provisions of the Disciplinary Policy in the School's Employment Manual.

Where any of the DSL, DDSL or EYDSL are implicated in an allegation, the Head may decide to appoint a replacement officer and the School will arrange appropriate training. Similarly, where the Head is involved, the Chairman of Governors may make appropriate arrangements under the provisions of the Disciplinary Policy in the School's Employment Manual.

If there is no evidence of misconduct or shortfall from the required performance level the member of staff will be permitted to return to normal duties and supported in their reintegration within the school community. Counselling and mentoring support will be provided as appropriate. Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references.

Pupils that are found to have made malicious allegations are likely to have breached school behaviour policies. The school will therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion or even, dependent upon the age of the pupil(s) concerned, referral to the police if there are grounds for believing a criminal offence may have been committed.

Allegations of Historic Abuse

The School will take all allegations of historic abuse seriously and will take advice and give due consideration to reporting the details of the allegation to the police and/or HSCB as appropriate.

Obligation to Report Adults to the DBS and NCTL

Regardless of employment status, the School has a legal duty to refer any individual to the DBS within one month of leaving the School where they have ceased to use that individual's services because they have:

- harmed a child or put a child at risk of harm
- satisfied the harm test - there has been no specific action or inaction but it is believed that the individual may harm a child, cause a child to be harmed, put a child at risk of harm, attempt to harm a child or incite another to harm a child, or
- received a caution or conviction for a specified offence which would result in the member of staff being included in either the children's or adult's barred list

Such instances of dismissal or cessation of employment or service use may not be covered by a Compromise or Settlement Agreement. The duty also applies where an individual has resigned to avoid any such allegations and/or an investigation.

In addition, the School has a statutory duty to consider referring members of teaching staff to the NCTL where they have ceased to use that teacher's services for reasons of serious misconduct or where they have resigned to avoid any such allegation and/or investigation. Serious misconduct includes:

- behaviour which is fundamentally incompatible with being a teacher
- behaviour which could lead to the individual being prohibited from teaching

If a person is dismissed or resigns (or otherwise ceases to provide services to the School) because child protection concerns exist or where a safeguarding issue also involves misconduct by a teacher, which it often will, a referral will be made by the School to both the DBS and the NCTL. In cases where there is any doubt, referral will be made to both the DBS and the National College for Teaching and Leadership.

In all cases, the need for clear, accurate record-keeping and tight confidentiality will be paramount.

Allegations involving Pupils including Bullying and Sexting

Staff should recognise that children are capable of abusing their peers. A whole-school approach to preventative education ensures that the curriculum, school policies, pastoral support and the school ethos

complement each other to create an environment that helps to prevent negative behaviour. The School's policies on behaviour management and anti-bullying make it clear that abuse is abuse which should never be tolerated or passed off as "banter" or "part of growing up". These policies and the School's practices make it clear that victims of peer on peer abuse will be supported as will the perpetrator.

Sexting is when a person takes an indecent image of themselves and sends it to a friend or boy/girlfriend via their mobile phone. The School's e-safety policies and practices emphasise that sexting is another form of abuse and the School's approach to it is robust and in accordance with the CEOP guidance. Any incident of sexting must be reported to the DSL in accordance with the procedures in this policy. The DSL will refer the matter to HSCB, who will decide upon a further referral to the Police.

Staff should recognise the different gender and age issues that 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/hazing type violence

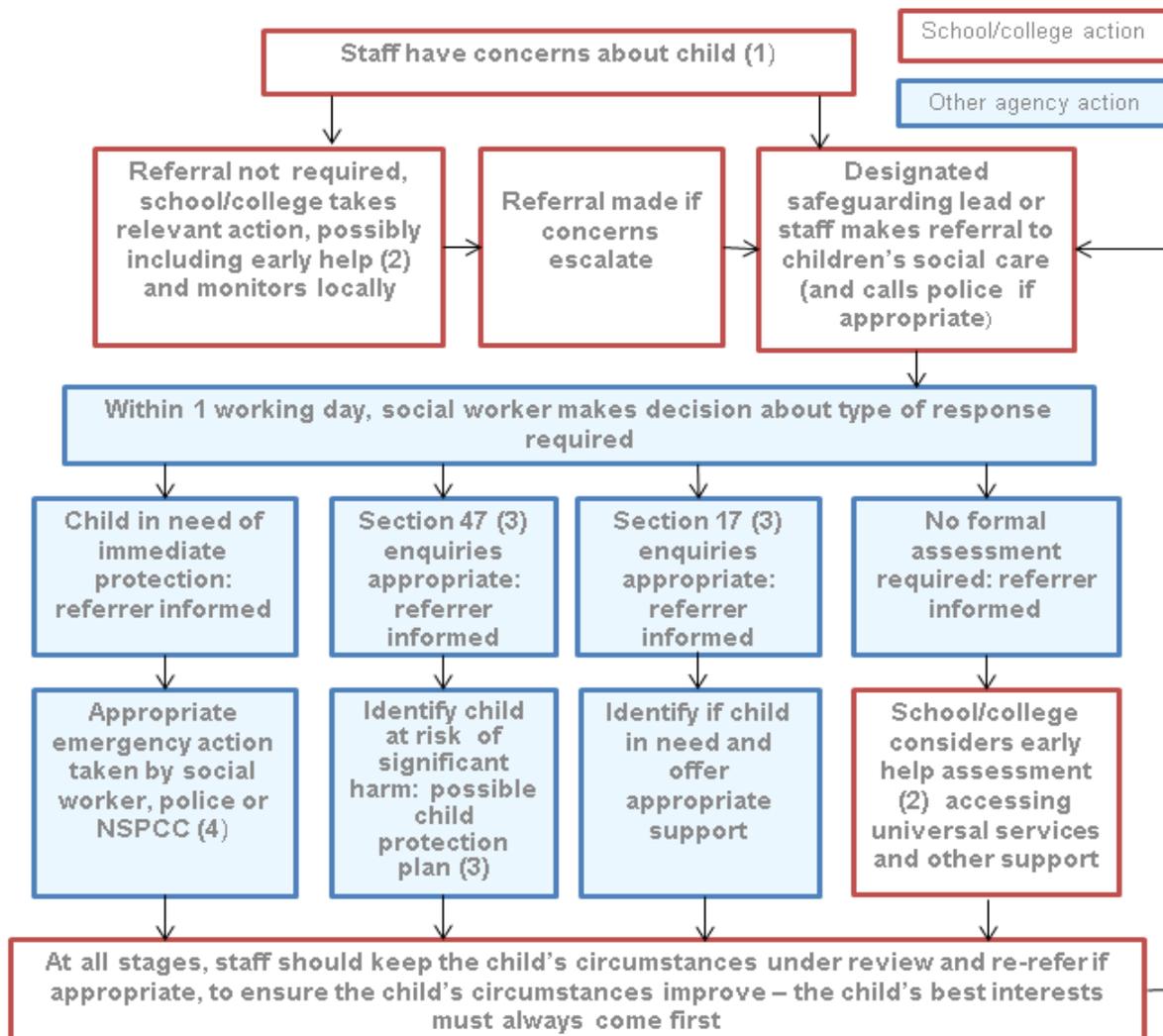
A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policies on behaviour, discipline and sanctions will apply.

Peer on peer abuse can manifest itself in many ways but any incident of bullying will be treated as a child protection concern when there is reasonable cause to suspect that a pupil is suffering or is likely to suffer significant harm. The School will take advice from the HSCB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the HSCB, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to suspend him / her during the investigation.

Appendix 1 – Actions Where There are Concerns about a Child (from KCSiE)

Actions where there are concerns about a child



1. In cases which also involve an allegation of abuse against a staff member, see Part four of KCSiE guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of "Working together to safeguard children" provides detailed guidance on the early help process.
3. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of "Working together to safeguard children".
4. This could include applying for an Emergency Protection Order (EPO).

Appendix 2 - Types of Abuse And Indicators of Abuse

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online.

NSPCC estimates that over half a million children are abused in the UK each year.

KCSiE (Updated for 2016), which is issued to all members of staff, gives in Part One the following definitions and guidance:

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). 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.

There are similar definitions and guidance available from the NSPCC website at: <http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>. See also the NSPCC fact sheet "Recognising signs of abuse at different stages of a child's development – April 2014" which is issued to all staff on joining the School and is available to all staff in the Child Protection Library of documents on Firefly.

Appendix 3 - Acceptable Use of Mobile Phones, Cameras and Recording Devices.

This policy applies to all areas of the School but has particular application to the Early Years Foundation Setting.

Mobile Phones

- All staff must ensure that their mobile phones, personal cameras and recording devices are left in the staff room during working hours.
- If any staff member has an emergency which requires them to keep their mobile close at hand, they should consult with the Head of Department and get permission for this. In this situation, any phone calls taken or made should be done so in a designated staff area of the setting where possible i.e. staff room of office.
- There are many occasions at which staff are required to carry a mobile phone – away matches, games on outlying pitches and off-site trips. On these, a School nominated mobile phone should be used. If these are not available for any reason then the staff personal phone number should be logged with the DSL/EYDSL or Head. Staff should not give out personal mobile numbers to pupils or parents/carers and be aware of the advice on minimising risk through electronic communication with pupils above.

Cameras

Children should only be photographed or filmed on video for the purpose of recording their development or participation in events organised by us. Parents indicate their consent to the above if they do not opt-out of this as designated in the School's Terms & Conditions of entry. Parents have the right of access to records holding visual images of their child.

- Only a School camera should be used to take any photo within the setting or on outings. If a school camera is not available then a personal one may be utilised subject to advance approval from the DSL/EYDSL or Head who will also check images taken.
- Images taken must be deemed suitable without putting the child in any compromising position that could cause embarrassment or distress
- All staff are responsible for the location of their classroom assigned camera.
- Images taken and stored on the camera must be downloaded as soon as practicable. Images should be downloaded to an approved network folder designated by the IT Manager.
- Images may only be uploaded to the school website by authorised staff and should never be uploaded to the internet for any other reason, including onto social networking sites e.g. Facebook.
- Under no circumstances must cameras of any kind be taken into bathrooms or boarding areas without prior consultation with the DSL/EYPO, Housemaster/mistress or Head. In this event, staff should be supervised whilst carrying out this activity. At all times the camera must be placed in a prominent place where it can be seen.
- It is the responsibility of all members of staff to be vigilant and report any concerns to the EYDSL, DSL, or Head.
- Any non-compliance will be taken seriously, logged and investigated appropriately in line with our disciplinary policies.

Appendix 4 - Child Protection Appointments

The school's **Designated Safeguarding Lead (DSL)** is:

Mrs Andrea Caldwell - Deputy Head (Pastoral) – Contact on Ext 235 or acaldwell@edgegrove.com or 07961 823725

The school's **Deputy Designated Safeguarding Lead (DDSL)** is:

Mrs Samantha Robinson - Head of Lower School – Contact on Ext 258 or srobinson@edgegrove.com or 07749 479406

The **Early Years Designated Safeguarding Lead (EYDSL)** is:

Mrs Gill Emmerson – Head of Pre Prep – Contact at Pre Prep on Ext 237 or gemmerson@edgegrove.com

The school's **Chair of Governors** is:

Mrs Jean Scott - contact through the School Bursar

The school's acting designated Governor for **Safeguarding** is:

The Chair of Governors – contact through the School Bursar

The school's acting designated Governor for **Staff Welfare** is:

The Deputy Chair of Governors, Paul Kendall – contact through the School Bursar

Hertfordshire Child Protection Contact numbers:

LADO Hertfordshire	01992 555420
Tony Purvis	07920 283 106

School Liaison Officer	
John Mairs	07795 051 172

Targeted advice (SLO)	01438 737 511
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Social Services (Disclosures & Out of Hours)	0300 123 4043
(Immediate on disclosure)	

Herts Safeguarding Children Board	01992 588 757
HSCB Office, Room 127, County Hall, Hertford, Herts. SG13 8DF	
E-mail: admin.hscb@hertscc.gov.uk .	

<u>NSPCC Whistle-blowing helpline</u>	0800 028 0285
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National College for Teaching and Leadership

Contact is made using the Teacher Referral procedure at:

<https://www.gov.uk/teacher-misconduct-referring-a-case>

Prevent:

To raise concerns relating to extremism:

DfE helpline

020 7340 7264

Or by email to:

counter.extremism@education.gsi.gov.uk

FGM:

All concerns relating to FGM should be reported to the local police on 101 or, in an emergency, 999

Appendix 5 – Logging a Safeguarding Concern



LOGGING A SAFEGUARDING CONCERN

<u>DATE:</u>	<u>TIME:</u>
<u>NAME of CHILD:</u>	
<u>FACTS</u> Please indicate where you have <u>interpreted</u> what you have been told. Use direct quotes, if relevant.	
<u>Who is / has been involved?</u>	
<u>What happened?</u>	
<u>Where did it take place?</u>	
<u>How often/ how long ago / how frequently?</u>	
<u>OPINION</u> <u>Please offer your opinion about what you have heard / seen / been told/ previous concerns</u>	
Any action taken by you:	
Name of Person you are passing this information to:	
<u>Name:</u>	<u>Job title:</u>
Your signature:	