



SAFEGUARDING POLICY (412a)

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AIMS AND OBJECTIVES

- St Mary's takes a whole school approach to safeguarding so that safeguarding and child protection are central to the school's ethos.
- The aim of the Safeguarding Policy at St Mary's is to safeguard and promote the welfare, health and wellbeing (physical and mental), and safety, including online, of the pupils at St Mary's School Ascot.

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- The welfare of the pupils is of paramount importance and the approach taken is always in the best interests of the pupils to enable pupils to have the best outcomes. We uphold a stance of zero tolerance of any kind of abuse, including child-on-child abuse of any kind and are committed to being vigilant at all times.
- St Mary's has a transparent culture and is a 'telling' school where expected standards of behaviour for all are widely communicated, poor behaviour is reported and challenged and policies, procedures, interventions and sanctions are applied consistently and proportionately.
- Pupils with health conditions, disabilities or special educational needs may be particularly vulnerable, suffer communication barriers and have indicators masked by their condition, and therefore warrant special care and attention.
- As a full boarding school we fully recognise and are committed to the responsibility we have under section 87(1) of the Children Act 1989 to safeguard and promote the welfare of each pupil and to protect and support them in all academic and co-curricular pursuits and in all boarding situations.
- Safeguarding is the responsibility of all staff; all Governors, teaching, residential, pastoral, support, self-employed peripatetic and ancillary staff, and all other adults working at the School receive regular training and updates and are required to understand and be familiar with the information and procedures described in this policy.

Our strategy has three main elements:

Prevention of harm: by creating and maintaining a positive school atmosphere with excellent pastoral support, stimulating teaching of a varied curriculum including co-curricular activities and vigilance by all staff and particularly within the boarding environment.

We recognise that high self-esteem, self-confidence, supportive friends and a clear line of communication with a trusted adult help all children, especially those who may be worried or anxious. St Mary's, therefore, has a listening culture and promotes an ethos where pupils are valued, feel secure and are encouraged to talk and are listened to.

Self-respect and respect for others are Behaviour Principles embodied in the Pupil Behaviour Policy (101) and the Anti-Bullying Policy (401) and are constantly reinforced during daily school life and in Chapel, House meetings and Tutor time.

The pastoral care of the pupils is of the utmost importance and all staff share in this responsibility. The House structure ensures that every pupil is carefully monitored; the Heads of House are the primary members of staff responsible for the pastoral care and wellbeing of their pupils alongside the Pastoral Deputy Head and the Head of Boarding. Every pupil also has a tutor throughout her time at St Mary's and the Heads of House work closely with the tutors and the boarding staff. Teaching and boarding staff are trained to be vigilant and refer all matters of concern including e-safety to the tutor and/or Head of House either in person or through CPOMS (Child Protection Online Management System) online reporting software, or by using the electronic boarding logs, or the flags on the St Mary's App (SMAPP) for lower-level and e-safety concerns. The School proactively uses Steer Tracking to help to identify pupils who may be particularly vulnerable to mental health or safeguarding risks in order to put in place preventative measures.

Pupils are also made aware of how to keep themselves as safe as possible and how to regulate their own behaviour, as well as how to recognise and report unacceptable behaviour from other children and adults. This includes educating pupils about online safety, through regular internal and externally provided ICT safety talks, about the safe use of electronic equipment and access to the Internet. The Pastoral Deputy Head works closely with the Director of Network Services to ensure that the school's internet filtering and monitoring systems support safe use of the internet. The School is in frequent contact with parents including about

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online safety and provides professional training specifically for parents from external providers about how parents can help to keep their children safe online outside of the school environment and at home.

Smartphones with access to the internet and e-mail must be registered on the school network and must be used in accordance with the ICT Acceptable Use Policy. Pupils are not permitted to have a second phone in school whether declared or secretly. Parents are advised that if they provide their daughter with a 3G, 4G or 5G enabled phone, internet access is not subject to the School's filtering and monitoring systems. All such phones with internet access must have a parental control app such as Qustodio enabled in order to monitor online activity and screen time, to restrict access and limit screen time at night in accordance with the specific age-appropriate guidance issued by the School.

The Relationships and Sex Education programme is a cross-curricular scheme described in the Relationships and Sex Education Policy (313a) which is taught throughout the age range. It is part of the PSHE education programme delivered during skills for life and other lessons and activities and is informed by the DfE Statutory Guidance RSE and Health Education July 2019. It covers healthy and respectful relationships and includes helping pupils to understand the meaning of consent and to recognise that widely encountered everyday sexist stereotypes and sexist language are unacceptable and can promote sexual harassment and/or abuse and abusive relationships. The PSHE programme includes body confidence and self-esteem, prejudice, discrimination, equality, and diversity. Pupils are regularly reminded how to report concerns and incidents which occur both in and out of school, including online, and the support that they will be offered if an incident is reported.

Protection from harm: by following agreed procedures as laid down by Windsor and Maidenhead Local Safeguarding Partners, and by ensuring that appropriate staff are properly recruited and trained to respond sensitively and appropriately to safeguarding concerns. This includes the protection of pupils from the risk of radicalisation in accordance with the DfE Statutory Prevent Duty Guidance.

St Mary's E-Safety Policy (406) and ICT Acceptable Use Policies promote online safety. The ICT AUPs are policy 411a in the School Handbook and 24/24a in the Staff Employment Manual. The ICT Steering Committee, ICT Working Party and Cyber and Technology Council conduct frequent and close reviews of operating procedures and policies and recommend and implement changes as required. Pupils review the ICT AUP with their tutor at the start of each academic year and sign that they agree to comply with it.

Online risks include: harmful content such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism; unreliable contacts such as adults posing as children with the intent to groom or exploit; ill-judged conduct such as sharing explicit images and online bullying; and ecommerce such as inappropriate advertising, gambling and scams. It is the responsibility of staff, with the support of the E-safety Committee, to regularly review the security protection of the school network, to implement suitable and proportionate filters, to monitor age appropriate use of technology, to educate pupils in the safe and sensible use of technology, to be vigilant about the opportunity to download harmful content via 3,4 and 5G that will bypass the school's filtering and monitoring systems, as well as to regulate pupils' use of technology. This is informed by the DfE Guidance Teaching Online Safety in Schools, June 2019 and Meeting Digital and Technology Standards in Schools and Colleges March 2023.

The boarding areas are clearly signed and only boarding staff are routinely permitted in the boarding areas. Access for non-boarding staff to the boarding areas follows a strict protocol which can be found in the Staff Employment Manual: Code of Conduct, on staff notice boards and it also forms part of the induction for new members of staff. Whenever a non-boarding member of staff is in the boarding area, appropriate steps are taken to protect pupils' privacy and safety. Parents and families of pupils are allowed in the boarding areas only when they are dropping off and collecting pupils at the start and end of term and then only up until 8.00 pm.

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All visitors to the site are requested to go to reception and register, as detailed in the Safety, Security and Access Policy. Reception staff receive tailored training in safeguarding. All visitors must wear a badge, be accompanied at all times and are given a leaflet with safeguarding information.

Support: by giving appropriate support to pupils and staff if incidents concerning safeguarding issues occur.

It is important to differentiate between safeguarding children who have suffered or are likely to suffer significant harm where cases should be reported to the Windsor and Maidenhead Local Safeguarding Partners immediately and those who are in need of additional support from one or more agencies. The latter could include cases of self-harm or eating disorders and should lead to multi-agency assessment using local processes, including the use of the “Common Assessment Framework (CAF)” and “Team around the Child (TAC)” approaches. St Mary’s will provide as much information as possible to allow any social care assessment to consider all the available evidence in order to enable a contextual approach to addressing the harm.

Early intervention is of paramount importance to prevent a problem from escalating and staff should take any concern, however small, immediately to the DSL, or any other senior member of staff, to ensure that it can be addressed and appropriate action taken and support given as necessary. The best interests of the pupil are at the heart of all safeguarding processes and the pupil’s wishes and feelings are sought and taken into account when determining what action to take. Pupils from groups at greater risk of targeting, such as those who are from different ethnic backgrounds, or identify as lesbian, gay, bisexual or gender-questioning, or are perceived as such have an increased vulnerability to abuse and may be less likely to report incidents or concerns. Staff must be particularly alert to the potential need for early help for a pupil who has any particular vulnerability and also be vigilant to possible peer group isolation or bullying of them. Vulnerabilities also include special educational needs, physical disabilities, special medical or health conditions, mental health concerns or conditions, challenging family or social circumstances, persistent absences from school, repeated suspensions, or personal issues. Staff are trained to be able to respond to pupils about a range of concerns including lesbian, gay, bi-sexual or gender-questioning issues in order to create a safe space for pupils to raise their concerns. The School works closely with its local safeguarding partners to establish what sort of early help may be appropriate.

The DSL is the Mental Health Lead in School and has undertaken relevant training to promote wellbeing and mental health. The Wellbeing Coordinator supports the DSL and Pastoral Deputy Head in the promotion of good mental health and wellbeing of pupils. They deliver pupil workshops on positive mental health and wellbeing, staff training on mental health and wellbeing support for pupils, and actively support good mental health for pupils through planned activities and as a listening ear. Pupils can access the Independent Person and the School Counsellor daily and the Wellbeing Committee with pupil representatives meets twice termly to explore initiatives to promote positive health, wellbeing and resilience. Health and Mental Health Matters Policy (410) in the School Handbook has more information including a Suicide Risk Mitigation and Prevention Policy.

Pupils are reminded in assemblies taken by the Headmistress or Deputy Heads or the School Council, in House meetings, tutor groups, the Skills for Life programme, in posters around the School and in their study diaries to whom they are able to talk. That may be their Head of House, their tutor, their residential member of staff, the Head of Boarding, the School Chaplain, their teachers, their house captains, their tutor monitor, the School prefects, the Independent Person, the School Counsellor, the School nurses or the School doctor, the Headmistress or the Deputy Heads. Posters and the pupil study diary encourage pupils to be confident that they can discuss a wide range of issues including gender and sexuality if they need to share their concerns. They are encouraged to find a person they trust with a particular awareness of their specific needs. Pupils are kept aware of the Anti-Bullying Policy (401) which encourages them to speak about issues worrying them.

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As part of their induction programme the head girls, and upper sixth and lower sixth prefects also receive safeguarding training including what action to take if they hear any allegations of abuse or bullying from other pupils.

Senior staff, Heads of House and residential staff have undertaken e-learning Channel General Awareness training which focuses on providing early support to people who have been identified as being vulnerable to being drawn into radicalisation and/or terrorism.

The School values and promotes effective relationships with parents and positive working relationships and partnerships with local safeguarding agencies and officials and it also recognises the need for all staff to have a broader contextual understanding of safeguarding risks beyond that of school and familial environments.

Details of the NSPCC helpline are displayed around the School, which aims to provide children and adults who are victims of sexual harassment and abuse in school with the appropriate support and advice, and pupils will be supported in accessing this helpline or other preferred further counselling or support as desired.

COMPLIANCE

This policy was updated in March 2025 and is informed by and complies with:

DfE Statutory Guidance Keeping Children Safe in Education September 2024

Working Together to Safeguard Children December 2023

ISI Handbook for the inspection of schools April 2024

National Minimum Standards for Boarding Schools September 2022

DfE Advice: Sexual violence & sexual harassment between children in schools and colleges September 2021

DfE Statutory Guidance: Relationships and Sex Education and Health Education 2019

DfE Guidance Teaching Online Safety in Schools June 2019

DfE Statutory Guidance: Prevent (April 2021)

Domestic Abuse Act April 2021

Charity Commission Guidance: Safeguarding and protecting people for charities and trustees June 2022

This policy is published in the School Staff Employment Manual, in the School Handbook which is available to Governors, staff, pupils and parents, and on the St Mary's School Ascot website, in accordance with the ISI Commentary on the Regulatory Requirements.

In all matters relating to safeguarding the School will follow the procedures set out in the Windsor and Maidenhead Multi-Agency Safeguarding Arrangement Procedures Manual, last revised March 2024. These procedures are updated twice a year and published on a dedicated website at https://proceduresonline.com/berks/windsor_maidenhead/index.html

Prevent Duty

In accordance with the Department for Education Statutory Guidance 2015: Prevent Duty (with effect from 1 July 2015, updated April 2021), St Mary's recognises its duty to have due regard to the need to prevent pupils from being radicalised and/or drawn into terrorism and adopts appropriate protocols to minimise the risk. The Designated Safeguarding Lead is the designated Prevent Duty person responsible for co-ordinating action within the School and liaising with other agencies.

Although the School assesses the risk to be low, the School implements prevention measures such as applying appropriate restrictions to internet sites likely to promote terrorist and extremist materials, discussing these dangers with pupils when appropriate in suitable forums, and undertaking Prevent awareness staff training

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periodically to ensure that staff are aware of their responsibilities with respect to Prevent, able to identify pupils at risk and know how to intervene.

All visiting speakers to the School are checked to ensure their suitability and supervised by a member of staff in line with the Visiting Speakers' Protocol in the Safety, Security and Access (413) section of the School Handbook. Details are recorded.

The School will work in partnership with the Local Safeguarding Partners over such matters; the level of risk will determine the most appropriate referral.

Review of Policy and Procedures

The Safeguarding Policy and Procedures at St Mary's are under regular review by the Safeguarding Review Board which meets 2 or 3 times a term. Any safeguarding incidents, decisions and actions taken are reviewed to consider whether the Safeguarding Policy needs to be updated to reflect lessons learned. Policies and procedures are reviewed and revised to comply with changes to statutory and other guidance from DfE, to RBWM procedures and to the ISI Handbook for the Inspection of Schools.

The School will remedy any deficiencies or weaknesses in safeguarding arrangements without delay, should any be necessary, and implement changes to policy or procedures in response to Government or other guidance as soon as they are identified.

The Safeguarding sub-committee of the Board of Governors meets twice per term to provide support and guidance to the Board and to maintain close contact with the Headmistress and DSL on safeguarding policy and operational matters including any serious casework, offering support, scrutiny and guidance as required. The Board of Governors has safeguarding as a standing agenda item for each meeting and carries out an annual review of Safeguarding Policy and Procedures during its meeting in the summer term.

ROLES AND RESPONSIBILITIES

All Staff at St Mary's

Safeguarding and promoting the welfare of pupils is everyone's responsibility at St Mary's. Every member of staff is responsible for providing a safe environment in which pupils can develop and learn and every member of staff who comes into contact with pupils must be able and be prepared to identify safeguarding concerns and know how to deal with them.

Designated Safeguarding Lead

Mrs Keely Benn is a member of the Senior Pastoral Leadership Team and the Safeguarding Review Board and is the Designated Safeguarding Lead (DSL) who has the ultimate lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) for St Mary's School Ascot. Ms Cristina Garcia, the Pastoral Deputy Head, and Ms Roisin Toner, the Senior Deputy Head, are the Deputy Designated Safeguarding Leads. All these senior members of staff have status and authority to take responsibility for safeguarding and child protection matters including online safety, have received training in safeguarding and child protection and multi-agency working from Windsor and Maidenhead Multi-Agency Safeguarding Partners and are familiar with 'Working Together to Safeguard Children December 2023.

The role of the Designated Safeguarding Lead is fully described in KCSIE Annex C. The broad areas of responsibility are:

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- to make and manage referrals to Windsor and Maidenhead Local Safeguarding Partners, the LADO, DBS, TRA, the Channel Programme and police as necessary and understand the need for information sharing;
- to liaise and work with the Headmistress/Governors, Wellbeing Coordinator, safeguarding partners and other external agencies;
- to receive current relevant training including Prevent Awareness training, receive regular updates and give or delegate required training to all staff, Governors, self-employed peripatetic staff, volunteers;
- to act as a source of support, advice and expertise for all staff including staff who have made a referral and to be available for staff to discuss child protection and safeguarding concerns, or the Deputy DSL to be available in their absence;
- to raise awareness of the Safeguarding Policy and procedures with all staff and ensure that these are reviewed annually by the Governors, are kept up to date, and are observed;
- to update the Governors on Safeguarding matters at each meeting and to be the clerk to and attend the Safeguarding Committee meetings;
- to promote the educational outcomes of pupils, particularly those with special welfare needs, including those with an allocated social worker, by sharing information about them with staff including SMET, by supporting staff to maintain high aspirations and by identifying appropriate adjustments and additional academic and other support that will be in the best interests of these pupils;
- to manage safeguarding records, to ensure the child protection file is transferred promptly and securely to the new school when a pupil leaves the School and to request safeguarding information for new pupils, including nil returns, from feeder schools;
- In conjunction with the pupil, her parents and other professionals, to review the need to pass on safeguarding information to an appropriate person at a university or other institution when a vulnerable young adult leaves the School.

The Governing Body

The Governing Body carries out an annual review of the School's Safeguarding Policy and procedures to ensure that they are up to date and meet the requirements of current legislation and statutory guidance. The DSL provides a detailed brief at the meeting for questions and discussion to enable the Governors to understand the requirements and satisfy themselves that there are appropriate policies, procedures and training in place to comply with the law and to effectively safeguard and promote pupils' welfare. Governors also review the efficiency with which the related duties have been discharged. Formal minutes of this review and related discussion are recorded and kept on file. In addition, Safeguarding is the first agenda item at each of the other Board meetings of the Governors.

Sr Michaela Robinson is the School Governor with leadership responsibility for safeguarding arrangements within the School. As well as being kept up to date on an ongoing basis with updates to policies and procedures she is involved in discussions pertaining to child protection and safeguarding matters with the DSL and she reviews and checks the Single Central Register on a termly basis.

The Safeguarding Committee is a sub-committee of the Board of Governors which meets once per term and normally consists of the Board Safeguarding Lead and one other Governor (this is routinely Mrs Annie Casey, E-Safety Governor and Chair of the Safeguarding Committee). Meetings of the Committee will be attended by the Headmistress, Designated Safeguarding Lead (DSL) and Deputy DSLs. The role of the Safeguarding Committee is to oversee safeguarding within the School and to provide support and guidance to the Board and to senior staff involved in safeguarding in ensuring that there is a whole school approach to safeguarding in order that it is at the forefront and underpins all relevant aspects of process and policy development and that all school systems, processes and policies operate in the best interests of the child.

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When the School premises are used by external agencies the Bursar, on behalf of the Board of Governors, ensures as part of the letting process that the external provider has satisfactory safeguarding policies and procedures, with appropriate arrangements in place to keep children safe and to liaise with St Mary's on safeguarding matters as appropriate. The Bursar, who oversees letting of the school during school holidays, is a trained DSL who will take the lead should there be a safeguarding concern raised during a let and who will ensure all the proper agencies are informed.

Safeguarding Review Board

The Safeguarding Review Board comprises the Designated Safeguarding Lead, the Bursar, the Senior Deputy Head (deputy DSL), the Pastoral Deputy Head (deputy DSL), the Recruitment Officer and the Compliance Officer. This board meets regularly to review and amend safeguarding policies and procedures in the light of new statutory or non-statutory guidance and in response to child protection incidents.

Pastoral Deputy Head

The Pastoral Deputy Head is responsible for the work of and line manages the Designated Safeguarding Lead. She is herself a Deputy Designated Safeguarding Lead who is trained and has authority to deal with safeguarding issues in the absence of the DSL.

Senior Deputy Head

The Senior Deputy Head is a Deputy Designated Safeguarding Lead who is trained and has authority to deal with safeguarding issues in the absence of the DSL.

Admission Register

The Senior Deputy Head is responsible for the Admission Register which is kept up to date by the School Secretary. The information is stored in iSAMS and an electronic and printed copy of the Admission Register is produced at the start of each school year, once a month, and whenever there are any changes made to it. Copies of the register are kept for 3 years after the end of the school year they refer to.

In accordance with DfE requirements the local authority is notified with relevant details of any pupil who joins or leaves the School at a non-standard transition point, ie at any time other than the beginning of year 7, year 9 or lower 6, or the end of year 11 or upper 6. The school secretary transfers this information to the relevant person at RBWM within 5 days of a pupil being added to the Admission Register and as soon as a pupil is removed from the Admission Register. This information is copied to the Local Authority where the pupil concerned is normally resident.

When a pupil joins the School the information required to be submitted to the Local Authority is all the information held within the Admission Register. When a pupil leaves the School the information required is the full name of the pupil, the full name and address and at least one telephone number of the parent with whom the pupil lives, the name of the destination school and the start date, and the grounds for deleting the pupil from the Admission Register.

SIGNS OF ABUSE

One of the best ways to help children is by being aware of the signs of possible abuse, neglect and exploitation. While these signs can take the form of physical injuries, all children are liable to get scratches, bruises, bumps and cuts from time to time in the normal course of childhood activities. Therefore it is sometimes difficult to tell the difference between injuries suffered as part of a quite normal childhood and those caused by physical

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abuse. Other wider contextual factors and behavioural indicators such as drug taking and or alcohol misuse, unexplainable and/or persistent absences from education, and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Abuse is any form of maltreatment of a child and it may be perpetrated by an adult, or another child, known or unknown to the victim. The main areas of abuse are physical, emotional, neglect, online and sexual mistreatment. Other areas of risk include child sexual or criminal exploitation, child-on-child abuse including sexual harassment and sexual violence, female genital mutilation, youth produced sexual imagery, honour based violence and involvement in serious violent crime. Any child who witnesses or experiences the effects of domestic abuse in their family is also regarded as a victim of abuse. Detailed information about signs of abuse can be found in **ANNEX A** to this policy.

DfE advice: “What to do if you are worried a child is being abused - Advice for practitioners” provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice. The NSPCC website also provides useful additional information on types of abuse and what to look out for. Up-to-date guidance on specific safeguarding issues such as sexual harassment and assault, domestic violence, fabricated or induced illness, gangs and youth violence, serious violent crime and gender-based violence is available from professional organisations such as the NSPCC. Web addresses are given at the end of this policy.

Staff should be aware that abuse, neglect, exploitation 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.

PROCEDURES

Procedures for dealing with allegations of abuse and making referrals

Reporting Allegations of Abuse

Allegations of abuse which meets the harms threshold, or behaviour which indicates a possible transferable risk to children may be made against a member of staff, supply teacher, volunteer, contractor, another pupil or pupils, or against another individual outside of the school environment. The allegation may relate to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children. For all safeguarding allegations, these procedures apply, including if appropriate, informing the LADO.

If a member of staff is made aware of an allegation of abuse, or if knowledge of possible abuse comes to their attention it is their duty to report the matter immediately. Such abuse includes: behaved in a way that has, or may have, harmed a child; possibly committed a criminal offence; posed a risk of harm to a child; behaved in a way that indicates they may not be suitable to work with children.

On hearing an allegation of abuse or complaint about abuse directly from a pupil, a member of staff should listen to the pupil, provide re-assurance that their report is being taken seriously, irrespective of whether an actual or online incident is being reported, and record the pupil's statements. The pupil should be assured that they will be supported and kept safe and that they have been right to report the abuse including child-on-child sexual harassment or violence and that the law is there to protect them. The member of staff should not probe or put words into the pupil's mouth, should limit questioning to the minimum necessary for clarification and should be non-judgemental. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the informant should be told that the matter will be

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referred in confidence to the appropriate people. Staff should be aware that some pupils may not be able or ready to talk or may not recognise their experience as harmful; in these circumstances staff should still report any concerns to the DSL. Where the disclosure relates to harmful sexual behaviours, if possible, the report should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where a member of staff has any concern about a child this should be referred immediately to the DSL or in their absence the deputy DSL or another member of SMET if they are temporarily unavailable and the member of staff should then make and submit a written record in any event. The DSL or their deputy will immediately inform the Headmistress so that the appropriate agencies can be informed within 24 hours and the matter resolved without delay. In the absence of the Headmistress the Chairman of Governors should be informed instead. The DSL will contact SPA, (RBWM Single Point of Access), formerly MASH (RBWM multi-agency safeguarding hub), and/or the LADO (local authority designated officer) if there is a concern about a member of staff, for advice and direction.

Where a member of staff has any concern about another member of staff, including the DSL, supply staff or volunteers, then this should be referred immediately and directly to the Headmistress. If there is a conflict of interest in reporting the concern to the Headmistress then it should be reported directly to the local authority designated officer (LADO).

Where a member of staff has any concern about the Headmistress then this should be referred immediately and directly to the Chairman of Governors without informing the Headmistress. The Chairman of Governors will immediately contact the LADO and no investigation into the concern will be undertaken until advice and guidance has been sought from the LADO.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made directly to the local authority children's social care and/or the police immediately. Any member of staff can make a referral using the contact details for the RBWM Safeguarding Referral and Assessment Team, the Thames Valley Police and the 'When to call the police' guidance given at the end of this policy. They should notify the DSL as soon as possible after doing so. The School does not require parental consent for referrals to statutory agencies.

All concerned should act with the utmost discretion: a complaint swept aside on the pretext that it is frivolous or malicious can damage the child and a mistaken allegation against a member of staff can damage their career.

Response to Allegations of Abuse

The Headmistress/ DSL will refer **all** allegations or suspicions of abuse to the local authority designated officer (LADO), or SPA (RBWM Single Point of Access), formerly MASH (RBWM Multi Agency Safeguarding Hub) as appropriate. Borderline cases will be discussed without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern indicates possible abuse. The School will not investigate before contacting the LADO. The LADO and the Headmistress/ DSL will decide in the circumstances what further steps should be taken. This could involve informing parents. In the case of a supply teacher the agency will be kept fully informed and involved in the case. In the most serious cases if a crime has been committed or if the school suspects a crime has been committed the police will be informed. The School will refer to the National Police Chiefs' Council guidance 'When to call the police' where relevant.

Where the allegation of abuse is made by one or more pupils against another pupil, where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, such abuse will be referred to RBWM. In the event of disclosures about child-on-child abuse, all children involved, whether perpetrator(s) or victim, would be treated as being 'at risk'. Guidance and support would be sought from RBWM local safeguarding partners and as a relevant agency the School would be involved in discussions with local safeguarding partners regarding action to be taken. A thorough risk-assessment of the situation and risk-based

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decision-making (with the benefit of the advice of statutory authorities, where appropriate) would be carried out with a view to ensuring the safety and best interests of all pupils. Both alleged victim(s) and perpetrator(s) would receive appropriate support and it may be that siblings of those involved also need support. Consideration would be given for example to: whether the alleged perpetrator should be removed from school for a period, or from certain classes, whether sleeping arrangements should be changed for boarders, whether contact between certain individuals should be prevented or supervised, the availability of counselling, the adequacy of arrangements for listening to children and further opportunities for challenging unacceptable behaviours and promoting respect for others. In the event of an allegation of serious sexual assault, contact between the alleged perpetrator(s) and victim(s) would be avoided during the investigation. The needs and wishes of the victim should be paramount and wherever possible, the victim, if they wish, should be able to continue in their normal routine. Sexual assault can result in a range of health needs which may require referral to the NHS Sexual Assault Referral Centre or other agencies. The alleged perpetrator(s) will also need support and possibly disciplinary sanctions; links at the end of this policy refer to dealing with harmful sexual behaviours.

Where a member of staff is facing an allegation of a criminal offence involving a pupil registered at the School, the member of staff concerned is legally entitled to anonymity until they are either charged with an offence or the anonymity is waived by them. All members of staff who are involved in an investigation or privy to such information have a legal duty to maintain confidentiality and provide information only to those who need to know.

If the allegation concerns a member of staff, a volunteer or another pupil they would normally be informed as soon as possible after the result of the initial investigation is known. They will be warned that anything said will be recorded. The School will appoint a representative to keep the person informed of the likely course of action and the progress of the case.

If it is established that the allegation is false, either on the basis of medical examination or further statements, a written record will be made of the decision and the justification for it and then the person against whom the complaint has been made would normally be informed that the matter is closed. Allegations that are found to have been malicious or unfounded will be removed from personnel records and those that are unsubstantiated, false, malicious or unfounded will not be referred to in employer references. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider what further help the pupil and/or the person who has made the allegation may be in need of; for example they may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care maybe appropriate. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it.

If the police decide to take the case further, the person concerned will be suspended only if there is no reasonable alternative. The reasons and justification for suspension will be recorded and the member of staff informed of them. In the case of staff the matter will be dealt with in accordance with the Disciplinary Procedure. Where a member of the residential staff is suspended pending an investigation of a child protection nature, the Headmistress will make suitable arrangements for alternative accommodation away from children. In the case of a pupil the matter will be dealt with under the School Rules, Discipline and Sanctions Policy (104).

During the course of the investigation the School in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with.

Any pupils who are involved will receive appropriate care.

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If an investigation leads to the dismissal or resignation prior to dismissal of the member of staff, the Teaching Regulation Agency (TRA) of the DfE will be informed.

St Mary's follows Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions, the Protection of Children Act (PoCA) and the Protection of Vulnerable Adults Act (PoVA) (see the Recruitment and Selection Policy and the DBS Procedures in the Staff Employment Manual). The School has a legal duty to make a referral to the DBS as soon as possible after leaving the School of any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children and has been removed from regulated activity, for consideration of whether inclusion on the barred lists is required. This includes dismissal, non-renewal of a fixed term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, removing a person from working in regulated activity, no longer using staff employed by a contractor, resignation when they would have been dismissed if they had not already resigned and voluntary withdrawal from any of the above. Where an allegation relates to a member of supply staff provided by an agency, the agency will be kept fully informed and involved. Where a dismissal does not reach the DBS referral threshold, consideration will be given to making a referral to the Teaching Regulation Agency (TRA). Reasons for making such referrals would include: unacceptable professional conduct with children and/or adults; satisfying the harm test in relation to children and/or vulnerable adults; conduct that may bring the profession into disrepute; or a caution or conviction, at any time, for a relevant offence. When an individual is removed from regulated activity as much relevant information as possible will be provided when the referral is made to the DBS. Any investigation will be led by an identified case manager, normally the Headmistress.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to identify any changes which could be made to policy or procedures to lessen the risk for the future.

Response to sharing of nudes and semi-nudes, sexual assault or harassment

Any concern about recent or historic sharing of nudes or semi-nudes, or sexual assault or harassment should be reported immediately to the DSL in the normal way who will report and discuss the matter with the Headmistress. If appropriate, subsequent interviews with the pupils involved will take place with or closely supported by a trained member of staff, and parents will be informed at an early stage, involved in the process in order to best support the pupil (unless there is good reason to believe that involving them would put the pupil at risk of harm) and also supported to understand the wider issues and motivations around the event. Any discussion of images will aim to identify the content without viewing wherever possible. Pupils will be helped to access organisations such as CEOP, the Internet Watch Foundation and Childline's "Report Remove" tool, to endeavour to get images online removed.

A risk assessment will be carried out immediately to determine pupils' safety in school and appropriate measures adopted swiftly and as necessary, such as separating the victim and the alleged abuser in classes or in the boarding area. A decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral framework. If a pupil has shared imagery consensually, such as when in a romantic relationship, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast, any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the police and/or children's social care. In these cases, the School will follow the advice from the National Police Chiefs' Council "When to call the police" in liaising with the police and making a report on these issues.

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An immediate referral to police and/or children's social care will be made at the initial stage if:

- The incident involves an adult;
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- The imagery suggests the content depicts sexual acts which are unusual for the pupil's developmental stage, or are violent;
- The imagery involves sexual acts and any pupil in the imagery is under 13;
- There is reason to believe a pupil is at immediate risk of harm as a result of the sharing of imagery, for example, the pupil is presenting as suicidal or self-harming.

A disclosure may not be a single event, and further information may be shared by the pupil at a later stage, prompting multiple reviews and risk assessments depending on the situation. The School appreciates that a child who discloses that they are the subject of an incident of sharing nudes and/or semi-nudes or sexual assault and/or harassment is likely to be embarrassed and worried about the consequences. When the disclosure is made the member of staff will ensure the child is feeling comfortable, and appropriate and sensitive questions are asked in order to minimise further distress or trauma.

In reviewing the risks and deciding whether a referral is needed, the following will be considered:

- The age of the pupil involved;
- The reason a nude or semi-nude was shared or if the incident of assault or harassment took was consensual or if there was an element of coercion;
- Whether a nude or semi-nude has been shared beyond its intended recipient and with the consent of the pupil;
- Whether a nude or semi-nude has been shared on social media or anywhere else online, and whether steps have been taken to guard the spread;
- Whether a nude or semi-nude was sent to more than one person;
- If there are any concerns about the pupil's vulnerability;
- If there are any additional concerns if parents are informed.

Procedures for Low-Level Concerns

Some behaviours are concerning but do not meet the harms threshold. It is important to deal with low-level concerns appropriately and expeditiously to prevent them escalating. A low-level concern is any concern that an adult working in or on behalf of the School may have acted in an unprofessional way that is inconsistent with the staff behaviour policy or code of conduct, including inappropriate conduct outside of work, but does not meet the harms allegations threshold and so does not merit a referral to the LADO. Examples of such behaviour could include, but are not limited to: being over friendly with pupils; having favourites; taking photographs of pupils on their mobile phone; engaging with a pupil on a one-to-one basis in a secluded area or behind a closed door; using unprofessional language.

Low-level concerns about a member of staff should be referred to the DSL or the Headmistress. The DSL will inform the Headmistress of all low-level concerns in a timely manner according to the nature of the concern. Low-level concerns about the Headmistress should be referred to the Chairman of Governors. All low-level concerns will be addressed sensitively and proportionately by the Headmistress, possibly after collaborating with the DSL, with the intention that unprofessional behaviour that does not meet the staff behaviour policy or code of conduct can be corrected at an early stage. The Headmistress will collect as much information as possible from the reporter, the member of staff concerned and any witnesses in order to establish what action needs to be taken. This will include looking for wider cultural issues that may have

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enabled the behaviour to occur and considering if extra staff training is required. Reports about supply staff and contractors will be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

Where a member of staff has engaged in behaviour themselves that they recognise to be a low-level concern they should report this as a 'self-referral'. A low-level concern does not mean that the incident is insignificant but that it does not meet the harm threshold as recognised by the LADO. Examples of self-referral could include but are not limited to brushing against a pupil in a corridor accidentally or knocking before entering a room and then discovering that a pupil is in a state of undress. We encourage staff at St. Mary's to self-refer by recording the incident on CPOMS or contacting the DSL. The DSL will follow-up with the member of staff as appropriate. The safeguarding team will ensure staff are trained on how to 'self-refer' to continue to foster a safeguarding culture within the School.

Low-level concerns will be recorded including the detail of the concern, the context and the actions taken and the rationale. Records will be kept securely and confidentially until the member of staff leaves the School. In accordance with KCSIE, low-level concerns relating exclusively to safeguarding will not be referred to in references although other low-level concerns relating to such matters as poor performance or misconduct may be. Records should be reviewed so that potential patterns of problematic or inappropriate behaviour can be identified and addressed.

Confidentiality

Members of staff should never give a guarantee of confidentiality to pupils or adults wishing to make a disclosure. They should guarantee only that they will pass on information to the minimum number of people required in order to ensure that the appropriate action is taken in response to the disclosure; they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

Record Keeping

All concerns, referrals, reports, conversations, discussions, meetings, communications, decisions taken and the reasons for the decisions, actions and outcomes, including instances of child-on-child abuse and harmful sexual behaviours, whether or not they are referred to another agency, are recorded in writing and stored confidentially in a designated child protection file.

Child protection files are shared only with those who need to see them but information is shared with all those who are actively engaged in the case within and outside of the School. The Designated Safeguarding Lead keeps a register of all child protection incidents and a register of all reports of child-on-child sexual abuse and harassment. Records containing information about allegations of sexual abuse will be kept for the term of the Independent Inquiry into Child Sexual Abuse and all other records of allegations will be retained until the accused has reached normal retirement age or for 10 years if longer.

In line with the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR), the School processes personal information fairly and lawfully and keeps the information it holds safe and secure.

Procedure if a Pupil is Missing

During the working day:

- first check with the pupil's friends and the most recent location of their device;

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- check the Health Centre;
- check the fire list on the network which will show if the pupil has scanned out of school;
- if necessary, inform the senior member of staff on duty who will then follow up this information.

If a pupil is missing at bedtime or in the early hours:

- first check with the pupil's friends and the most recent location of their device;
- check the fire list on the network to see if an exeat has been authorised;
- ring the Health Centre;
- call the pupil's mobile telephone;
- do a thorough search of the boarding area;
- consult the senior member of boarding staff on duty in School (see duty rota);
- check any other information before contacting the senior member of staff on duty who will then deal with the matter.

If the pupil remains missing, the senior member of staff will:

- continue to call the pupil's mobile telephone;
- check again with the pupil's friends and ask the friends to call the pupil's mobile telephone (because the missing pupil may be more likely to answer the telephone to friends);
- initiate a thorough search of the school buildings and grounds following the approved protocol, using colour coded maps that identify discrete areas, to ensure that no location is overlooked;
- sound the fire alarm to activate a check of all pupils in school;
- if the pupil still cannot be located the parents will be telephoned;
- if the pupil is still missing and cannot be located the senior member of staff will agree with parents to call the police;
- If the parents are not available, the police will be called directly;
- In conversation with the police, the senior member of staff will explain that a missing pupil is extremely unusual and therefore serious.

A record is kept by the Pastoral Deputy Headmistress of any instances in which a pupil is missing from school without satisfactory permission and documentation, including the action taken and the pupil's explanation. Staff should be aware that prolonged or repeated absence from school may indicate a safeguarding risk.

Where a day pupil or boarder is missing from school because they have returned home or refuse to return to school after an authorised absence, the school will liaise with the parents to establish the best way forward for the pupil. If there is any concern for the safety or wellbeing of the pupil, or in the case of a day pupil's unexplained extended absence, the school will liaise with RBWM and/or the local authority of the pupil's home address. If the pupil leaves the School, the School will notify the two Local Authorities as described on P9.

ENSURING SAFE STAFF

Safe Staff Recruitment

St Mary's ensures the implementation of safe recruitment practices in accordance with all statutory guidance (see the Recruitment and Selection Policy (34) and the DBS Policy and Procedures (13) in the Staff Employment Manual). Statutory procedures for checking the suitability to work with children of all staff whether teachers or non-teachers, including employed teachers and self-employed peripatetic visiting teachers and coaches, volunteers and Governors are always followed including enhanced criminal records

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checks with the DBS, barred list checks, prohibition order checks, further checks on those who have lived or worked overseas, section 128 prohibition from management checks and compliance with Independent School Standards Regulations. The Recruitment Officer and at least one member of those interviewing at St Mary's must have received the Department for Education safer recruitment training.

Assurance is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils on another site.

Staff Training

St Mary's has a positive safeguarding culture and all staff are reminded regularly that they have a duty of care of pupils under their supervision and a responsibility to speak up about safeguarding and welfare matters. All child protection and safeguarding training is given by one of three members of staff: Pastoral Deputy Head, Senior Deputy Head, and Bursar, all of whom have themselves received training in child protection and safeguarding matters and multi-agency working provided by the Royal Borough of Windsor and Maidenhead and who are familiar with the Guidance 'Working Together to Safeguard Children'.

All staff including the Headmistress, full-time and part-time staff, self-employed peripatetic staff and voluntary staff including Governors receive initial child protection and safeguarding training including online safety, filtering and monitoring as part of their induction programme. They are made aware of this Safeguarding Policy including its Staff Behaviour Policy, the Pupil Behaviour Policy and the identity and role of the DSL and deputy DSL, and trained in the importance of being alert to the signs of bullying, abuse, including harmful sexual behaviours, and children at risk of radicalisation, and the procedures for recording concerns and reporting them to the DSL or the Headmistress. Staff complete a quiz at the end of the training to check their understanding of crucial points. Support staff and self-employed peripatetic staff complete an induction checklist to be signed off by their Head of Department or returned to the Recruitment Officer.

Part 1 of Keeping Children Safe in Education, including Annex B, is issued to new staff and to all staff at each revision and is discussed during INSET. Staff who work directly with pupils are required to complete an online questionnaire to demonstrate that they have read and understood the document. Other staff complete a paper questionnaire to demonstrate that they have read and understood it. A condensed version of KCSIE (KCSIE Annex A) may be provided to staff who do not work directly with children in lieu of Part 1 if the DSL considers it will provide a better source of information for them to safeguard and promote the welfare of children.

Governors' training is designed to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures, and the appropriate filters and monitoring systems to ensure online safety, are effective and support the delivery of a robust whole school approach to safeguarding. Training includes their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. Governors' safeguarding training consists of 1 hour induction from the DSL; requirement to read and confirm KCSIE whenever it is updated; 10 minutes safeguarding update from the DSL at the start of the Michaelmas and Lent term meetings; 30 minutes safeguarding training from the DSL at the summer term meeting; enhanced safeguarding training for the Safeguarding Governor and the Chair of the Safeguarding committee.

The DSLs undertake accredited training by attending at least 4 out of 6 RBWM DSL Network meetings in any 2 year period. They receive frequent updates from e-bulletins and have discussions with other professionals in order to keep abreast of safeguarding developments. Refresher child protection and safeguarding training including online safety is provided regularly for all staff and Governors and is recorded.

Regular updates about changes to policy or new procedures or requirements and topical matters such as harmful sexual behaviours and online sexual abuse, are given during INSET or issued as a paper or e-bulletin

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at the beginning of most terms when staff are reminded that it is the responsibility of every member of staff to safeguard pupils, and these resources are available for staff online.

STAFF BEHAVIOUR POLICY

Guidelines on Professional Behaviour

Staff are expected to manage pupil behaviour effectively to ensure a good and safe educational environment in school in accordance with the DfE Teachers' Standards (updated July 2021), and to have a clear understanding of the needs of all pupils including those with SEND or mental health needs. It is staff's responsibility to behave professionally in all their dealings with children and specifically with pupils for whom staff have a duty of care. This guidance has been produced to help staff establish the safest possible learning and working environments where an atmosphere of trust exists in which colleagues can conduct their professional lives with confidence. The aims are to safeguard young people - all staff have both a duty of care and a responsibility to speak up about safeguarding and welfare matters using the Whistleblowing procedures.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that any such guidance cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene the guidance given. It is expected that in these circumstances staff will always advise their senior colleagues of the justification for any such action already taken or proposed. The Code of Conduct in the Staff Employment Manual covers expectations of general behaviour whilst on duty and includes arrangements for staff access to the boarding areas.

Position of Trust

A relationship between a member of staff and a pupil cannot be a relationship between equals. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in educational settings are in positions of trust in relation to the young people in their care. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 when that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.

Wherever possible, staff should avoid behaviour which might be misinterpreted by pupils or onlookers, and should always report and record any incident with this potential to the DSL.

Physical Contact with Pupils

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore, use their professional judgement at all times. Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances

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should be recorded as soon as possible and notified to the DSL and, if appropriate, a copy placed on the pupil's file.

The Use of Force to Control or Restrain Pupils

The Education Act 1996 forbids corporal punishment and St Mary's complies with the rejection of its use in all circumstances. The Act allows all teachers to use reasonable force to prevent a pupil from:

- committing a criminal offence
- injuring themselves or others
- destroying property
- acting in a way that is counter to maintaining good order and discipline at the school

This is in addition to the common law power of any citizen to use reasonable force in self-defence, or to prevent another person from being injured or committing a criminal offence. The School's guidance on use of restraint is designed to ensure the safety of staff and pupils. We believe that it is only ever acceptable to use reasonable force to prevent a pupil harming herself, another pupil, a member of staff or any other person, or destroying property.

Force used to avert an immediate danger

All staff supervising or in charge of pupils are authorised to use reasonable force in situations which meet the objectives outline above. If immediate action needs to be taken to protect a pupil (for example, to intercept a fall downstairs) and physical intervention proves necessary, it should involve the minimum of force required to prevent injury to persons and damage to property. A sole member of staff is advised not to intervene physically in an argument unless absolutely necessary but to raise the alarm and summon assistance if necessary. Under no circumstances should physical force be used as a form of punishment.

Force is only to be used when:

- the risk of not using force is outweighed by the risk of using it
- the chances of achieving the desired result by other means are low
- when the potential consequences of not intervening are extremely serious

The kinds of situation in which the use of force might be advisable are:

- if a pupil is trying to harm herself or someone else very seriously or even fatally
- if a pupil is about to run in front of a moving vehicle
- if a pupil were about to throw a brick through a window and there was someone else on the other side of the glass who would be injured

The refusal of a pupil to remain in a particular place is not enough on its own to justify the use of force. It would, however, be justifiable if the pupil were about to risk her own or someone else's safety.

The types of force staff are authorised to use are:

- passive physical contact such as blocking a pupil's path
- active physical contact eg leading a pupil by the hand or arm, ushering a pupil away by placing a hand in the centre of the back

Where there is an immediate and high risk of death or serious injury, a member of staff would be justified in taking any necessary action consistent with the principle of seeking to use the minimum amount of force required to achieve the desired result. Staff should make every effort to avoid acting in a way that might reasonably expect to cause injury. If staff need to touch a pupil for any of the reasons above, they should be very careful about how and where they touch pupils. Conduct must always remain appropriate.

Staff will be reminded of this guidance as part of regular child protection and safeguarding training. In addition, it will be included in the induction programme for all new staff.

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Reporting and recording incidents where force has been used to control or restrain pupils

As soon as is practicable, the use of force should be reported to the Headmistress or one of the Deputy Heads. A full written account should be supplied (as described below). The Headmistress or Senior Deputy Head or DSL should inform the pupil's parents and give them an opportunity to discuss the incident. It may also be necessary to report the incident to authorities outside School and the Headmistress or Senior Deputy Head in consultation with the DSL will make this decision.

A record should be made by the person who used restraint and passed to the Headmistress, Senior Deputy Head or DSL. The record should include the following information:

- the name(s) of the pupil(s) involved
- when and where the incident took place
- why the use of force was deemed necessary
- details of the incident, including all steps taken to diffuse the situation and resolve it without force and the nature of the force used
- the pupil's response
- the outcome of the incident
- a description of any injuries suffered by the pupil or others and/or any property damaged during the incident.

After any incident, the School should seek to offer continuing support to all staff and pupils involved in the incident.

Monitoring and Review of the use of Physical Restraint

The DSL keeps and monitors a register of all instances where physical restraint is used. This policy is reviewed each time an incident occurs and annually including a consideration by the Headmistress as to whether additional staff training is required to enable staff to de-escalate potentially violent situations without the need for restraint.

Physical Education and Other Activities Requiring Physical Contact

Where exercises or procedures need to be demonstrated, caution should be used if the demonstration involves contact with pupils and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will on occasions have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. This should be done with the pupil's prior agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

Members of Staff and One-to-One Situations

Where staff perform a pastoral, disciplinary or tutorial task, or give co-curricular lessons such as music or drama, this may involve them being in one-to-one situations. Staff working in one-to-one situations must plan and conduct these to minimise the risk of harm to all parties. One-to-one meetings should take place in the vicinity of other teachers and pupils, in a room with visual access. If possible, doors should remain open (or have glass panels) and there should be the equivalent of a desk or small table width between pupil and teacher. Residential staff who need to deal with an individual pupil, for example a distressed pupil at night, should avoid any inappropriate one-to-one contact, should remain in a public area and, if necessary, take the pupil to the Health Centre.

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Residential staff, including those living outside the main building, eg Heads of House, should ensure that pupils do not enter their accommodation unless invited to do so in an exceptional circumstance.

Residential staff with children hosting visiting pupils

The National Minimum Standards for Boarding Schools 2022 (NMS 20.10) does not allow pupils into staff accommodation unless in exceptional circumstances. However, footnote 44 clarifies that this standard does not prevent boarders from visiting their friends who live in staff accommodation. The School operates the following policy to ensure such visits are conducted safely.

If the visit is to take place during term time, the hosting member of staff should contact the Head of House who will seek permission from the visiting pupil's parents. The hosting member of staff should add a note to CPOMS labelled 'pupil guest in staff accommodation', tagging their own child and the pupil(s) they are hosting.

If the visit is out of term time, the hosting staff will need to seek written permission from the parents of the visiting pupil(s) directly and add a note to CPOMS as above.

In line with the NMS, staff should avoid being alone with the visiting pupil(s).

Any concern about the welfare of the visiting pupil(s) should be reported to the DSL immediately and any concern about the conduct of the hosting member of staff should be reported to the Headmistress.

Transporting Pupils

It is not advisable for a member of staff to give a lift in a car to a pupil alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as a chaperone. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, the journey should be made known to a senior member of staff and appropriate control measures implemented.

Social Contact and Communication

Staff must not socialise with pupils outside the normal course of their duties. Socialising would include, although is not restricted to, personal, telephone, text messaging and e-mail contact, and contact through social media sites such as Facebook or Instagram. Staff are required to adhere to the ICT Acceptable Use Policy for Staff which includes regulations on e-communications. Given the required professional nature of staff/pupil relationships throughout the pupil's time in school, the School recommends leaving a period of three years after a pupil has left school before making any social contact with them using social media, personal email or any other form of communication. Staff who have left St Mary's should not have contact with current pupils nor contact any former pupil until three years after the pupil has left school.

Staff should ensure that their conduct does not give rise to comment or speculation and should bear in mind that comments and behaviour towards pupils may be misconstrued. Staff should ensure that no comments are made towards pupils that contain sexual innuendo or connotations or are of an otherwise sexual nature.

Other

Whilst it is recognised that these guidelines do not cover every situation and that there will be many occasions on which members of staff will have to use their own professional judgement and discretion, the above outlines some potential problem areas and how to minimise risks.

Staff should refer to these guidelines in conjunction with other School policies including the Code of Conduct and the Disciplinary Policy in the Staff Employment Manual.

Whistleblowing

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If a member of staff believes that best practice is not being adhered to in the care and protection of a pupil or pupils, or that a practice may put a pupil or pupils at risk, they have a responsibility to speak up and should follow the procedures set out in the Whistleblowing Policy (44) in the Staff Employment Manual. In the first instance they should raise the matter with the DSL or the Headmistress or any other member of SMET with whom they feel comfortable.

Genuine concerns about policy or procedures will be taken seriously by senior staff and no member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern about unsafe practice, providing that they do so in good faith and follow the whistleblowing procedures.

Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external body such as the local Single Point of Access (SPA), formerly known as Multi Agency Safeguarding Hub (MASH). In addition, the NSPCC has a dedicated Whistleblowing helpline. Contact details for both are at the end of this policy.

Under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to make a protected disclosure and raise a concern directly with an external body without penalty where the employee reasonably believes

- that exceptionally serious circumstances justify it;
- that the School would conceal or destroy the relevant evidence;
- where they believe they would be victimised by the School;
- or where the Secretary of State has ordered it.

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EXTERNAL AGENCY CONTACT INFORMATION

Royal Borough of Windsor and Maidenhead Safeguarding Partnership:

<https://rbwmsafeguardingpartnership.org.uk/p/safeguarding-children/safeguarding-in-education>

https://proceduresonline.com/berks/windsor_maidenhead/index.html

**RBWM Local Authority Designated officer, (LADO) - 01628 683202, 07774 332675,
LADO@achievingforchildren.org.uk**

RBWM Single Point of Access (SPA) - 01628 683150, mash@achievingforchildren.org.uk

RBWM Safeguarding Referral and Assessment Team - 01628 683150

RBWM Out of Hours Emergency Duty Service - 01344 786543

RBWM Local Safeguarding Partners – 01628 683234

Thames Valley Police Emergency – 999

**TVP Safeguarding Schools Officer - 07968 190529,
Angela.Ferrucci@thamesvalley.pnn.police.uk**

Thames Valley Police Non-Emergency – 101 (0845 8 505 505)

National Police Chiefs' Council (NPCC)

[When to call the police](#)

Working Together to Safeguard Children

https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

Child Exploitation and Online Protection command

<https://www.ceop.police.uk/Safety-Centre/>

DfE Guidance for signs of abuse

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

DfE Information Sharing Guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

UK Council for Child Internet Safety Guidance on Youth Produced Sexual Imagery

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB_I_.PDF

NSPCC signs of abuse guidance

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

NSPCC general helpline

<https://www.nspcc.org.uk/services-and-resources/nspcc-helpline/>

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Worried about a child? Contact our trained helpline counsellors for 24/7 help, advice and support.
help@nspcc.org.uk Text: [0808 800 5000](tel:0808 800 5000)

NSPCC Safeguarding children with special educational needs and disabilities (SEND)

[Children with special educational needs and disabilities \(SEND\) | NSPCC Learning](#)
[Safeguarding Deaf and disabled children | NSPCC Learning](#)

NSPCC Report Abuse in Education helpline for children and adults

<https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>
help@nspcc.org.uk / [0800 136 663](tel:0800 136 663)

NSPCC dedicated Whistleblowing helpline

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Free advice and support for professionals concerned about how child protection issues are being handled in their organisation. [0800 028 0285](tel:0800 028 0285) help@nspcc.org.uk

[NSPCC Protecting children from harmful sexual behaviour](#)

[Sexual violence and sexual harassment between children](#)

[Lucy Faithfull Foundation Preventing harmful sexual behaviour](#)

DfE Prevent Duty dedicated telephone helpline and website

for non-emergency advice for staff and governors: [020 7340 7264](tel:020 7340 7264)

counter-extremism@education.gsi.gov.uk

RBWM Prevent Duty Officer:

Craig Miller, Head of Community Protection & Enforcement - [01628 683598](tel:01628 683598)

CHANNEL General Awareness e-Learning:

http://course.ncalt.com/Channel_General_Awareness

Workshop to Raise Awareness of Prevent (WRAP)

<http://erscb.org.uk/training/prevent-wrap/>

DfE Non-Emergency Number: 020 7340 7264

counter.extremism@education.gov.uk

Disclosure and Barring Service

DBS customer services, PO Box 3961

Royal Wootton Bassett, SN4 4HF

[03000 200 190](tel:03000 200 190); customerservices@dbb.gov.uk

TRA (Teaching Regulation Agency)

[0207 593 5393](tel:0207 593 5393); misconduct.teacher@education.gov.uk

<https://www.gov.uk/government/organisations/teaching-regulation-agency>

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<https://teacherservices.education.gov.uk/>

OFSTED Safeguarding children

0300 123 4666 (Monday to Friday from 8am to 5pm); CIE@ofsted.gov.uk

Independent Schools Inspectorate

0207 6000 100; concerns@isi.net

Whistleblowing

<https://www.gov.uk/whistleblowing>

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SAFEGUARDING POLICY (412a)

ANNEX A: TYPES OF ABUSE

Signs of Abuse

The diagnosis of child abuse requires a professional assessment. The list given below is not intended to be a comprehensive tool for recognising child abuse but such signs may indicate a problem. See also the guidance to be found in KCSIE, on the DfE website and the NSPCC website, the contact details for which are on the previous pages. All staff should be aware that abuse can take place wholly online as well as offline, and online technologies can also be used to facilitate offline abuse. The School's ICT Acceptable Use Policies for pupils and staff contain further guidance on the subject of mobile technologies and staying safe online, including the safe use of 3G, 4G or 5G services outside of the school network.

Behavioural signs

If a child is being physically abused, their behaviour may change in one or more of the following ways. They may:

- Become sad, withdrawn or depressed
- Have trouble sleeping
- Behave aggressively or be disruptive
- Develop mental health concerns
- Show fear of certain adults
- Have a lack of confidence and low self-esteem
- Use drugs or alcohol.

The Child:

Signs of Physical Abuse

Physical abuse may result in the symptoms described below. Aside from direct physical contact, physical abuse can also be caused when a parent or caregiver feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. Signs of physical abuse include:

- Injuries that the child cannot explain or explains unconvincingly
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Bruising which looks like hand or finger marks
- Cigarette burns, human bites
- Scalds and burns.

Serious Violence

Indicators that a child may be at risk from serious violent crime include increased absence from school, change of friendships, significant decline in performance, signs of self-harm, significant change in wellbeing, signs of assault. Unexplained new possessions might indicate involvement with criminal gangs or networks.

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Signs of Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact or non-contact activities, such as involving children with pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways. Sexual abuse can also take place online. Signs of sexual abuse displayed by children may include:

- Difficulty walking or sitting
- Pain/itching/bleeding/bruising/discharge to the genital area/anus
- Spending excessive and / or sustained periods in the toilet
- Urinary infections/sexually transmitted diseases
- Persistent sore throats
- Eating disorders
- Self-mutilation
- Refusing to change for gym or participate in physical activities
- Exhibiting an inappropriate sexual knowledge for their age
- Exhibiting sexualised behaviour in their play or with other children
- Lack of peer relationships, sleep disturbances, acute anxiety/fear
- School refusal, running away from home.

Child-on-Child Abuse

Child-on-child abuse is any form of physical, sexual, emotional, psychological, online or financial assault or harassment, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate) with other pupils at St Mary's and with pupils from other schools. Pupils at St Mary's may enter into relationships with pupils at other schools, particularly boys' schools, and the School is aware of and alert to the possibility of abuse taking place in this setting. Such abuse, including: unwanted sexual comments or touching (over or under clothing); pranks and banter; initiation rituals; hazing (actions taken or situations created with the intention of creating mental or physical discomfort, embarrassment, harassment, or ridicule); innuendo; bullying, upskirting (taking a photo under another person's clothing without them knowing, which is a criminal offence); sexual harassment, sexual violence, being coerced into sexual activity without consent; and sharing nudes and semi-nudes which may cause pain, distress, anxiety or humiliation to another pupil is unacceptable. It will not be tolerated or passed off as "banter" or "part of growing up", and serious incidents will be treated as child protection concerns. All reports of child-on-child abuse will be passed to the DSL immediately and investigated, and serious concerns will be passed on to the relevant Local Authority Safeguarding Partnership(s) and parents informed, in accordance with Part 5 of Keeping Children Safe in Education. These activities may be stand alone or be part of a broader pattern of behaviour. KCSIE and the previous DfE advice: Sexual Violence and Sexual Harassment between Children in Schools and Colleges contains further detailed information.

Pupils suffering from child-on-child abuse may be reluctant to report it directly so staff should be vigilant to unusual behaviours, overheard conversations or mental health concerns that might alert them to it. Ignoring or denying child-on-child abuse can lead to a culture of unacceptable behaviour, an unsafe environment where children accept abuse as normal behaviour. It is essential that all staff recognise the prevalence of harmful sexual behaviours and understand the importance of challenging inappropriate behaviours between peers to avoid a culture of unacceptable behaviours becoming accepted as normal and therefore not being reported. All staff should be clear that all child-on-child abuse, whether in school or elsewhere, should be reported to the DSL and understand the important role they have to play in responding to it and therefore helping to prevent it. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an

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important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. In all events pastoral staff will support the victim and alleged perpetrator of such incidents to enable both to resume normal behaviour. Child-on-child abuse is also dealt with in 401 Anti-bullying Policy.

Sexual Harassment and Sexual Assault

The terms “sexual harassment” and “sexual assault” are used to describe one or more acts of physical, psychological or emotional violation in the form of a sexual act, inflicted on someone without their consent. It can involve forcing or manipulating someone to witness or participate in any sexual acts. The School understands that pupils may experience sexual harassment and/or assault both within and outside of the school context and encourages pupils to come forward for help and support should they have experienced this. In accordance with the June 2021 Ofsted review of sexual abuse in schools and colleges, the School recognises that sexual abuse and harassment can go unreported and will assume that online sexual abuse and sexual violence are happening in and around the School, even when there are no specific reports. Where disclosures are made, victims will be taken seriously and offered appropriate support and this approach is extended to all those affected. The School’s response to incidents or disclosures will be non-judgemental, appropriate in the circumstances and guided by the principle of proportionality. The School’s primary concern at all times is the welfare, safety and protection of the young people involved. This Safeguarding policy addresses these issues in the Aims and Objectives – Prevention from harm; and in Procedures – Response to allegations of abuse; and Response to Sharing nudes or semi-nudes, sexual assault or harassment.

Sharing nudes or semi-nudes (also known as youth produced sexual imagery)

The UK Council for Child Internet Safety (UKCCIS) guidance ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’ defines sharing nudes and semi-nudes as when:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under 18;
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18 or an adult;
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under 18.

The term “sharing nudes and semi-nudes” means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online (also referred to as “sexting”). This could be via social media, gaming platforms, chat apps or forums, as well as via personal messaging or sharing between devices offline through platforms such as Apple’s AirDrop. Incidents can broadly be divided into two categories: aggravated (involving additional or abusive elements, often with the intent to harm or to recklessly misuse) or experimental (including romantic – such as between young people in a relationship and not intended for distribution beyond the pair, sexual attention seeking and other cases that do not appear to have aggravating elements, such as children taking pictures of themselves with no intention to share with others). Making, possessing and distributing any imagery of someone under 18 which is ‘indecent’ is illegal, including of oneself, if under 18.

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

CSE/CCE involve exploitative situations where the young person receives some reward in exchange for engaging in sexual or illegal activities such as transporting money or drugs through county lines or is blackmailed or otherwise coerced into doing so. What marks out exploitation is an imbalance of power in the relationship. CSE/CCE can involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex or deal drugs, for example, sexual bullying including cyberbullying and grooming. “County lines” drug dealing, where illegal drugs are transported from one area to another by

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children or vulnerable young people who are coerced by gangs, can encompass both CCE and CSE, with increased levels of intimidation, violence (including sexual violence) and weapons-related crimes. Some young people who are being sexually or criminally exploited may not themselves recognise the exploitation and may not exhibit any external signs of this abuse. CSE includes any kind of sexual physical contact and non-contact activities involving sexual imagery or watching sexual activities. It may happen over a prolonged time or be a one-off event. Signs of child criminal exploitation and / or child sexual exploitation can include:

- Persistent absences from school or home;
- Unexplained acquisition of money, clothes, jewellery, mobile phones or other expensive gifts;
- Spending more time online or on their devices, or using more than one phone;
- Relationships with controlling older individuals or groups;
- Loss of interest in school and significant decline in performance;
- Using inappropriate sexual, gang, drug-related or violent language;
- Meeting with unfamiliar people and becoming isolated from peers or social networks.

Female Genital Mutilation (FGM)

Professionals in all agencies including teachers, and other individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. The mandatory reporting duty requires teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. They should also report any such case to the DSL and involve children's social care as appropriate. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM and FGM can happen at different times in a girl or woman's life, including during childhood or as a teenager. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Signs that may indicate a girl is at risk from FGM include special occasions or ceremonies in preparation for womanhood or marriage, long holidays overseas (particularly during the summer holidays and at school transition periods, such as primary to secondary school) and the presence of a family member who has undergone FGM. Signs that FGM may have taken place include having difficulty walking, standing or sitting, spending longer in the bathroom or toilet, acting differently after a long absence from school and a reluctance to visit a doctor or undergo routine medical examinations. There are no health benefits to FGM and it can cause pain, infections and other physical harm, as well as mental health problems such as depression, flashbacks and self-harm.

Honour Based Abuse (HBA) including Forced Marriage

So-called 'honour-based' abuse (HBA) 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 HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the DSL.

Domestic Abuse

A child who witnesses, or experiences the effects of, domestic abuse in their family is also the victim of abuse. Domestic abuse may be physical or sexual violence, emotional or economic abuse, or controlling or coercive behaviours perpetrated by over 16-year-olds against over 16-year-olds in a family. Children may also suffer domestic abuse in intimate teenage relationships. Domestic abuse can have a detrimental and long-term impact

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on their health, wellbeing, development, and ability to learn. Any reports of domestic abuse should be passed on to the DSL.

Signs of Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's development. It may involve conveying to children that they are worthless or unloved, inadequate or undervalued. It may feature inappropriate expectations being imposed on children, relative to their actual development or age.

Signs of emotional abuse displayed by children include:

- Excessive behaviour, such as extreme aggression, passivity or become overly demanding
- Self-harm, for instance by scratching or cutting themselves
- Behaviour either inappropriately adult or infantile
- Persistently running away from home
- High levels of anxiety, unhappiness or withdrawal.

Signs of Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. This is likely to result in the serious impairment of the child's health or development.

Affluent Neglect refers to the neglect experienced by children in wealthy families. This type of neglect can be hard to spot and can include (but not limited to); emotional disconnect, pressure to succeed, drug and alcohol use (by parents and/or children), domestic abuse and disguised compliance. It can be difficult to explore this type of neglect as the parents may have differing views on how their child's needs are being met. It is important that we recognise and respond to any signs, engage with parents and where necessary involve external agencies.

Signs of possible neglect include the child:

- appearing underweight and very small for their age
- being poorly clothed, with inadequate protection from the weather
- presenting with sustained personal hygiene issues
- being often absent from school for no apparent reason
- being regularly left alone, or in charge of younger brothers or sisters.

Indicators of abuse may include the parent or responsible adult:

- Denying the existence of or blaming the child for the child's problems at home or at school
- Seeing and/or describing the child as entirely worthless, burdensome or in another negative light
- Having unrealistic expectations of the child i.e. demands a level of academic or physical performance of which they are not capable
- Offering conflicting or unconvincing explanation of any injuries to the child
- Appearing indifferent to or overtly rejects the child
- Refusing offers of help for the child's problems
- Or being inappropriately distant.

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**ST MARY'S SCHOOL ASCOT
SAFEGUARDING POLICY (412a)**



ANNEX B: GLOSSARY OF TERMS

CAF	Common Assessment Framework
CHANNEL	The duty set out in the Counter-Terrorism and Security Act 2015 to provide support for people vulnerable to being drawn into terrorism.
CSE	Child Sexual Exploitation
CCE	Child Criminal Exploitation
DBS	Disclosure and Barring Service
DDSL	Deputy Designated Safeguarding Lead
DfE	Department for Education
DSL	Designated Safeguarding Lead
FGM	Female Genital Mutilation
HBV	Honour Based Violence
ICT AUP	Information and Computer Technology Acceptable Use Policy
INSET	In-Service Training
iSAMS	Internet School Administration Management System
ISI	Independent Schools Inspectorate
KCSIE	Keeping Children Safe in Education
LADO	Local Authority Designated Officer
LSP	Local Safeguarding Partners
MASH*	Multi Agency Safeguarding Hub (*now known as SPA)
NSPCC	National Society for the Prevention of Cruelty to Children
POCA	Protection of Children Act
POVA	Protection of Vulnerable Adults Act
PREVENT	The Statutory DfE Guidance to have due regard to the need to prevent people from being drawn into terrorism.
RBWM	Royal Borough of Windsor and Maidenhead
RSE	Relationships and Sex Education
SMILE	St Mary's Interactive Learning Environment
SPA	Single Point of Access (RBWM team, formerly MASH)
TAC	Team Around the Child
TRA	Teaching Regulation Agency
UKCCIS	UK Council for Child Internet Safety
WRAP	Workshop to Raise Awareness of Prevent
YPSI	Youth Produced Sexual Imagery