SAFEGUARDING

APPLICABILITY: All Staff and Governors

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This document brings together the School's policies to safeguard and promote the welfare of all pupils in the School, including those in boarding and EYFS. It is available to School staff via the intranet and to parents and carers via the School website.

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SAFEGUARDING AT TETTENHALL COLLEGE

This document brings together the School's policies to safeguard and promote the welfare of all pupils in the School, including those in EYFS.

1. Safeguarding and promoting the welfare of children is defined as:

   a. providing help and support to meet the needs of children as soon as problems emerge

   b. protecting children from maltreatment, whether that is within or outside the home, including online

   c. preventing the impairment of children's mental and physical health or development

   d. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

   e. taking action to enable all children to have the best outcomes.

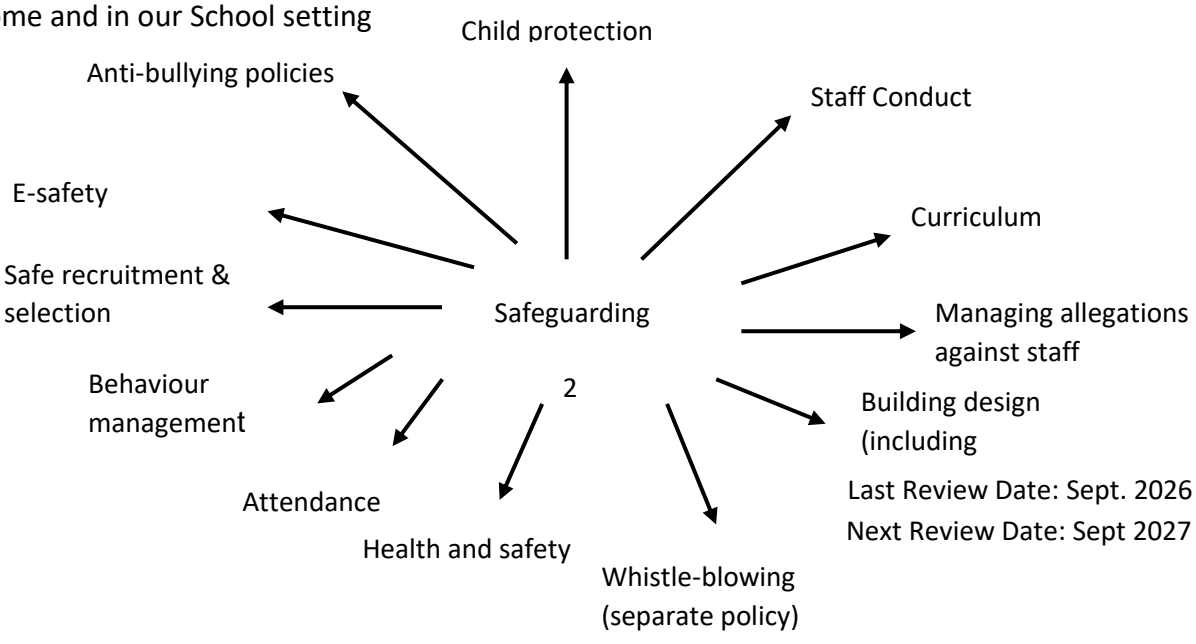
2. Tettenhall College is committed to Safeguarding and Promoting the Welfare of all of its pupils. Each pupil's welfare is of paramount importance. We recognise that children who are abused, neglected or exploited may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at School, their behaviour may at times be challenging. We recognise that some children who have experienced abuse may harm others. We will always take a considered and sensitive approach in order that we can support all of our pupils. This policy applies to all adults, including volunteers, working in or on behalf of the School.

3. Everyone working in or for our School service shares an objective to help keep children and young people safe by contributing to:

4. Providing a safe environment for children and young people to learn and develop in our School setting, and

5. Identifying children and young people who are suffering or likely to suffer significant harm and taking appropriate action with the aim of making sure they are kept safe both at home and in our School setting

6.



Safeguarding Children - A shared Objective!

7. It is our objective at Tettenhall College to help keep children and young people safe. In April 2014 (updated March 2015, July 2015, September 2016, September 2018, September 2019, September 2020, September 2021, September 2022, September 2023, September 2024, September 2025), the Government published Keeping Children Safe in Education (KCSIE). This document contains information on what schools and colleges should do and sets out the legal duties with which schools and colleges must comply. Part One and Annex A was shared with all staff in September and is shared with any new members of staff who join during the academic year.

a. Working Together to Safeguard Children (updated 2026)

b. What to do if you are Worried a Child is Being Abused (March 2015) and

c. Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (May 2018, updated September 2021)

8. Educational establishments have a statutory duty to have arrangements in place relating to safeguarding and promoting the welfare of children introduced by section 175 of the Education Act 2002.

9. Safeguarding and Promoting the welfare of children is defined as:

a. protecting children from maltreatment;

b. preventing impairment of children's health or development;

c. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and

d. undertaking that role to enable those children to have optimum life chances and to enter adulthood successfully.

e. providing help and support to meet the needs of children as soon as problems emerge

f. protecting children from maltreatment, inside or outside the home, including online.

10. With regard to the specific responsibilities of education professionals, Working Together to Safeguard Children 2026 states that safeguarding is **everyone's responsibility**. Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

11. Education staff have a crucial role to play in helping to identify welfare concerns, and indicators of possible abuse, neglect or exploitation at an early stage. Any member of staff may refer those concerns to the appropriate organization, normally Wolverhampton

Safeguarding Together, contributing to the assessment of a child's needs and where appropriate to on-going action to meet those needs:

Wolverhampton Safeguarding Together
Priory Green Building
Whitburn Close
Wolverhampton
WV9 5NJ
01902 555392
(01902 552999 – out of hours)
WST@wolverhampton.gov.uk

12. Tettenhall College has developed a staff code of practice that all staff understand and agree to. The code of practice is to be found in the staff handbook and on the website and offers guidance to staff on the way they should behave when working with children.

13. Tettenhall College will endeavour to support all pupils through:

a. ensuring the content of the curriculum includes social and emotional aspects of learning

b. ensuring that child protection is included in the curriculum to help children recognize when they don't feel safe and to identify who they should tell;

c. promoting a positive, supportive and secure environment where pupils can develop a sense of being valued; and

d. having arrangements in School for listening to children and providing early help.

14. We recognize that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. Our School may be the only stable, secure and predictable element in their lives.

Training

15. The School is following locally agreed multi-agency safeguarding procedures. The Assistant Head (Pastoral), Mr. Simon. Sherratt, is the Designated Safeguarding Lead (DSL) with the Children's Services Department (WSCP)/ DfE. His training matches the description given in KCSIE Annex B. Mr. Sherratt attended Core Working Together – Safeguarding Children and Young People (Wolverhampton Safeguarding) on 04/12/24. Mr C McAllister, Headmaster has also received training that matches the description given in KCSIE Annex B.

16. The DSL is assisted in aspects of child protection by Mr Gomersall. All persons attend updates in child protection every two years, and this covers multi-agency working. Mr Gomersall attended Core Working Together – Safeguarding Children and Young People training on 10/03/21 and completed refresher training on 20/02/24.

17. In accordance with the advice of WSCB, all other staff and the nominated safeguarding governor are given an appropriate level of training and receive child protection refresher training every three years. The induction training provided for all newly appointed staff (including governors) and volunteers covers the child protection policy, including the identity and role of the DSL, the staff code of practice, the Acceptable Use Policy, Part One and Annex A of KCSIE, allegations against staff, Prevent, Whistleblowing Policy, on-line safety, and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. A record of this training is kept by the DSL.

18. The training provided for governors equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated (in line with point 18 below).

19. The regular formal training for staff is supplemented with informal updates on INSET Days, by email and in staff meetings as required, but at least annually.

A WHOLE-SCHOOL POLICY ON BULLYING

20. Tettenhall College has measures in place to encourage good behaviour and prevent all forms of bullying. This policy is made known to all pupils through notices in classrooms and in the boarding houses. School staff have access to it via the School intranet and it is available to parents on the School website. Copies may also be requested from the Headmaster's Office.

21. Education is essential to preventing bullying and to empower victims to take action. Open communication between teachers and pupils is essential to identifying children needing help - both targeted pupils and those who bully. Teachers who know their pupils well enough to recognize when they are experiencing trouble are in a strong position to start intervention to help troubled pupils. Ultimately, preventing bullying requires safe and supportive classroom environments marked by trust, care and respect between and among teachers and pupils.

A STATEMENT ON BULLYING

22. The School aims to maintain a safe environment in which pupils do not identify bullying as a problem in the School. The School's policy and procedures have regard to the DfE's guidance in ''Preventing and Tackling Bullying'' (October 2014, updated July 2017).

23. An overarching definition of bullying states that it is usually repeated over time and intentionally hurts another pupil or group physically or emotionally and is often motivated

by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or because a child is adopted or is a carer. It may occur directly or through cyber-technology (social websites, mobile 'phones, text messages, photographs and email).

24. Bullying can be described as deliberately hurtful, threatening or frightening behaviour, whether physical or psychological, repeated over a period of time where it is difficult for those being bullied to defend themselves. However, such behaviour does not have to be repeated over time for schools to take action. Bullying on the basis of protected characteristics is taken particularly seriously.

According to 'Kidscape':

25. It involves:

a. aggression and unequal power relationship; and

b. it results in pain and distress and is persistent.

26. A person is being bullied when someone else, or a group of others, sets out to make him or her miserable and unhappy. In its most serious form it can lead to psychological damage and even suicide;

27. Bullying is harmful behaviour, usually over a period of time. Staff will watch out for the signs and symptoms of all forms of bullying:

a. physical;

b. verbal;

c. indirect, e.g. spreading rumours or social exclusion;

d. emotional; and

e. misuse of mobile phones or Internet message boards and chat rooms (see section on cyberbullying below).

28. Abuse is never tolerated or passed off as 'banter'. Staff awareness is raised and maintained through in service training to assist them in taking action to reduce the risk of bullying at times and in places where it is most likely. Staff understand that they need to support the victims of abuse by reassuring them that if reported, they will be taken seriously and will be supported. Pupils will never be made to feel ashamed of reporting abuse, sexual violence or sexual harassment.

29. There will also be reasonable consideration and appropriate adjustments made for any pupils in the School with special educational needs and disabilities, when appropriate.

30. The School recognises that any pupil can be bullied but certain factors that can make bullying more likely are:

a. a lack of close friends in the School;

b. shyness;

c. race, culture, religion or sexual orientation;

d. special educational needs (SEN), a disability or some other obvious difference in appearance or health;

e. gender issues(including sexual and sexist bullying); or

f. social background.

31. The School does not permit any ''initiation ceremonies'' intended to cause pain, anxiety or humiliation.

Recognising the Signs of Bullying

32. Bullying, both physical and emotional, is always treated seriously because of the hurt and distress it causes. In the most severe cases it can lead to physical harm, psychological damage, illness or absence from School.

33. Tettenhall College does not accept or tolerate bullying. We will do all we can to prevent it happening, and to deal with it when it does happen; recognising that both the person being bullied and the bully needs help.

34. Staff will suspect bullying is occurring if a pupil:

a. becomes withdrawn and anxious;

b. shows a deterioration in his or her work;

c. starts to attend School erratically;

d. has spurious illnesses;

e. persistently arrives late at School;

f. prefers to stay with adults; and

g. is constantly seeking attention.

35. The College also believes that it should raise the awareness of bullying and educate all members of the School community as to how to behave towards one another in a civilised manner. Examples of such education can be found in the programme for PSHE, the content of assemblies and the enrichment programme and the day-to-day pastoral work by all members of staff. A major part of the PSHE programme will consist of educating pupils about how to identify and manage bullying related issues, with the key aim of preventing bullying from being a serious problem in our community. There is a zero-tolerance attitude towards sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

36. In Key Stage 1 and EYFS there can be the need to identify different strategies for dealing with bullying behaviour in younger children.

What should you do if you are being bullied or you are aware that someone else is being bullied?

37. Because bullying can only continue if there is a conspiracy to keep it secret, always tell someone (for example a prefect, a member of staff or your parents) if you are being bullied or if you see bullying going on. What you say will be treated seriously and sensitively.

38. What will happen is this:

a. The person being bullied will be encouraged to talk about it with a member of staff of his or her choice or a Peer Mentor. The incident will be recorded in writing and a log kept, enabling any patterns to be identified (This will be recorded on CPOMS).

b. The bully (or bullies) will be interviewed. In serious cases, written statements from the victim, the bully and any witnesses may be asked for. Changing the attitude and behaviour of bullies will be part of the responsibility of the positive procedures used by the School. However, the School recognises that sanctions may also have to be used against bullies.

c. Ways of dealing with each individual situation will be discussed. In many cases, admonishment and counselling of the bully may be sufficient to resolve the issue and to prevent any recurrence. However, if it is appropriate, sanctions will be imposed. In extreme cases or where there have been previous warnings, offenders may be suspended or excluded from the School.

d. A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

39. It is the School's policy to tackle any case of bullying in partnership with parents. Therefore parents will be informed of any incident of bullying as soon as is possible.

40. In all cases, there will be close monitoring of the situation afterwards for as long as is necessary to ensure that the incident can be considered to be closed.

41. Bullying records are kept to enable patterns to be identified (On CPOMS).

42. Useful advice can be found in the DFE statutory guidance 'Preventing and Tackling Bullying' (October 2014, updated July 2017).

ONLINE SAFETY

43. The school recognises that safeguarding risks increasingly emerge online, where children may be exposed to harmful **content, contact, conduct, or commerce**.

In line with KCSIE 2025, particular risks include:

- **Misinformation and disinformation**, which can undermine pupils' understanding of health, politics, or personal safety.

- **Conspiracy theories**, which can contribute to isolation, radicalisation, or exposure to extremist ideas.
- **Manipulated media (including deepfakes and AI-generated content)**, which can be used to bully, exploit, or deceive children.

The school will:

- Embed critical thinking skills into the curriculum (PSHE, RSHE, computing).
- Provide parents with guidance on supporting safe online use at home.
- Train staff annually to recognise and respond to online risks.
- Ensure filtering and monitoring arrangements meet DfE standards, are regularly tested, and are reported to governors each year.

Filtering and Monitoring

The School has appropriate filtering and monitoring systems in place (Senso) to safeguard pupils when accessing the internet through School devices and networks. The DSL works alongside the IT team and senior leaders to review filtering and monitoring arrangements regularly and ensure safeguarding concerns identified through these systems are appropriately recorded, assessed and acted upon. Governors receive appropriate information regarding the effectiveness of filtering and monitoring arrangements and provide oversight to ensure systems remain effective and proportionate.

The DSL will work in partnership with the Nominated Safeguarding Governor to ensure that filtering and monitoring arrangements are reviewed annually and monitored through termly Safeguarding Committee meetings chaired by the DSL.

CYBERBULLYING

44. Cyberbullying is a 'method' of bullying, rather than a 'type' of bullying. It includes bullying via text message, via instant-messenger services and social network sites, via email, and via images or videos posted on the internet or spread via mobile phone. It can take the form of any of the previously discussed types of bullying, i.e. technology can be used to bully for reasons of race, religion, sexuality, disability, etc.

Dealing with Cyberbullying Incidents

45. There is usually some visual evidence after cyberbullying has taken place. Pupils should be encouraged to pass this on to a member of staff or their parents. In some cases, it will be necessary to contact mobile phone companies, Internet service providers or social networking sites.

46. The following advice should be given to those experiencing cyberbullying:

a. do not retaliate or reply;

b. block or remove offenders from 'friendship' lists;

c. review the information you are giving out;

d. make sure you tell an adult;

e. try to keep calm and do not let the bully see a reaction; and

f. keep any evidence you have, for example text messages or print web pages.

47. If the person responsible for the bullying is identified, sanctions will be applied under the School's behaviour policy. In addition, the following sanctions might be implemented, depending upon the nature and severity of the bullying:

a. confiscating equipment such as mobile phones;

b. withdrawing access to the Internet for a set period of time;

c. limiting use of the Internet for a set period of time; or

d. contacting the police.

48. Where the cyberbullying is sufficiently severe, informing external agencies such as social networking or email member sites.

49. Support will be provided for the victim and the bully.

50. This may include meeting the bully to discuss what has happened and agree a way forward with the victim. Both will get the necessary support. It is important that all children and staff recognise that when an incident of cyberbullying takes place it is dealt with swiftly. Parents should be told, in the early stages of any bullying, what actions have been taken to remedy it and written records kept.

51. For further information, please see DfE's Advice for Parents and Carers on Cyberbullying (published November 2014).

YOUTH PRODUCED SEXUAL IMAGES (CONSENSUAL AND NON-CONSENSUAL SHARING OF NUDE AND SEMI-NUDE IMAGES AND/OR VIDEOS)

52. There are a number of definitions of youth produced sexual images but the simplest is:

53. 'Images or videos generated by children under the age of 18 that are of a sexual nature. These images may be shared between children and young people and/ or adults via a number of devices such as phones, tablets, webcams or published to social media websites.'

54. It is likely that no two incidents of youth produced sexual images will be the same. However, two categories have been established:

a. Aggravated incidents – these incidents involve criminal or abusive elements beyond the creation of the image;

b. Experimental incidents – these incidents involve youths taking pictures of themselves to share with established boy or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking.

55. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is an offence. This includes imagery of yourself if you are under 18.

56. Whilst it is unlikely to be considered in the public's interest to prosecute children, young people need to be aware that they may be breaking the law and can be prosecuted.

57. The National Police Chiefs Council advice is to treat this as a safeguarding issue. Schools may respond to incidents without involving the police.

58. Where the police are notified of incidents, they are obliged to record the incident on their crime systems. The incident will be listed as a 'crime' and the young person involved will be listed as a 'suspect'.

59. There is a way of recording the outcome of an investigation into youth produced sexual imagery – Outcome 21: 'Further investigation, resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect is not in the public interest. This is a police decision.'

60. It is not possible to categorically say that an incident recorded on police systems with Outcome 21 would never be disclosed on a DBS certificate. Schools need to consider this when deciding upon their response.

61. The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved. We will do all we can to avoid unnecessary criminalisation of children.

62. The issue of sharing of nude and semi-nude images and/or videos is covered across the School via the curriculum, particularly PSHE and ICT.

63. In 2017, the UK Council for Internet Safety (UKCCIS) produced practical guidance, Sexting in Schools and Colleges (Published in December 2020 and updated in March 2024 – Sharing nudes and semi-nudes: Advice for education settings working with children and young people). The guidance aims to take a 'common sense' attitude to dealing with youth produced sexual imagery.

USE OF CAMERAS AND MOBILE PHONES AND SMART DEVICES IN SCHOOL BY CHILDREN

Online Safety

61.It is essential that children are safeguarded from potentially harmful and inappropriate online material. Within this policy there are strategies to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate (Please also see the 'Acceptable Use Policy' for details of filters and monitoring systems in place which are reviewed annually).

62. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

a. content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

b. contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.

c. conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, upskirting using a smart watch/camera on a mobile phone; sharing other explicit images and online bullying; and

d. commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

63. Cameras, smart glasses, wearable camera/AI devices and similar recording technology should not be brought to School or used during the School day, unless specific permission has been granted by a senior member of staff for an agreed educational, medical or accessibility purpose.. Sixth Form pupils may use their mobile phones in their Common Room, but not for taking photographs or videos. It should be expressly understood and agreed that in all other places, mobile phones should not be used during the School day, including for taking photographs or videos. Pupils below Sixth Form may not use their mobile phones at all during the School day. The School retains the right to confiscate mobile phones for up to 48 hours if they are being used inappropriately. All pupils should not be wearing smart watches.

Use of Cameras and Mobile Phones in School by Staff and Adults

64. Although staff and adults may bring cameras and mobile phones on to the premises, it must be understood that photographs or videos should not be taken other than for educational or promotional purposes. Mobile phones should be switched on to silent/ vibrate mode while on School premises.

65. No member of staff should give out their personal mobile phone number to pupils and must not have pupil contact numbers in their own phone. Wherever possible, the School's mobile phone should be used for School trips and visits. However, there may be times when more than one phone is necessary. Where this is the case, a member of staff (or volunteer) may use their personal phone but access to this should be very restricted. Volunteers should be advised not to take photographs on School trips and visits.

Visitors, contractors, agency staff, guardians and other adults attending the School who are wearing smart glasses or wearable camera/AI devices must declare these devices when signing in. Such devices must not be used to photograph, record, livestream or capture audio whilst pupils are present unless explicit permission has been granted by a member of the Senior Leadership Team for an authorised purpose.

66. Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in School events, subject to the following guidelines, which the School expects all parents to follow:

a. When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience or even cause distress for those with medical conditions; the School therefore asks that it is not used at indoor events.

b. Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.

c. Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.

d. Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. The School will always print a reminder in the programme of events where issues of copyright apply.

e. Parents may not film or take photographs in changing rooms or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.

67. The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.

68. For further information, please see the Use of Images of Children Policy, the Preparatory School E-Safety Policy (in the Staff Handbook), the Early Years Online Safety Policy and the Online Safety Policy (Number 23b).

Emailing and Instant Messaging

69. No member of staff may give a pupil their personal email address. Nor should a member of staff accept or initiate friend requests from a student on any social media platform, including (but not limited to): Facebook, X, Instagram, Snapchat, WhatsApp, BlueSky etc. Children and staff should never reply to unpleasant or unwanted emails or open files from people they don't know.

70. When writing emails or instant messages, think carefully about the content. When angry or distressed, you might send something likely to cause further anguish. Leave the computer and discuss the issue with someone else.

71. Pupils are encouraged to respect other people on and offline and to recognise how sharing a secret and passing on numbers and passwords can cause harm and distress to others.

72. The issue of being a bystander or accessory is addressed with all children. Being a bystander can include:

a. forwarding messages;

b. contributing to discussions; or

c. taking part in an online poll.

73. The Thinkyouknow presentation provides an overview of young people's online behaviour and CEOP's Thinkuknow educational materials. Tettenhall College parents can also access Mr A Foster's website www.iLearn2.co.uk which includes parent resources including hundreds of video tutorials, activity ideas, tips and advice to support learning and help keep children safe online. The website also includes parent guides to different technologies and social media platforms, and new resources are added every month. National Crime Agency's CEOP Education Programme provides information for the children's workforce and parents and carers on protecting children and young people from online child sexual abuse.

Online safety is taught through a planned and progressive curriculum, primarily within PSHE, Computing and assemblies, and is reinforced across the wider curriculum where appropriate. Teaching is designed to be age-appropriate and responsive to emerging online risks and current issues.

Staff use a range of high-quality, up-to-date teaching resources and guidance from recognised national organisations and government agencies to support the delivery of online safety education. These resources are reviewed regularly to ensure they remain relevant and reflect current legislation, guidance and best practice.

The online safety curriculum covers topics including, but is not limited to:

- safe and responsible use of technology and the internet;
- privacy, personal information and digital footprints;
- cyberbullying and respectful online behaviour;
- online relationships and consent;
- misinformation, disinformation and critical thinking;
- gaming, social media and online communication;
- reporting concerns and accessing support; and
- recognising and responding to online risks, including exploitation, grooming, sextortion and other forms of online abuse.

The curriculum is informed by current statutory guidance and nationally recognised frameworks for online safety and is reviewed regularly to ensure it continues to meet the needs of pupils and reflects developments in technology and online safeguarding.

ARTIFICIAL INTELLIGENCE (AI)

The school acknowledges the opportunities and risks associated with **generative artificial intelligence (AI)**.

In line with DfE's **Generative AI: product safety expectations**, the school will:

- Carry out risk assessments for any AI tool used by pupils or staff.
- Ensure children are supervised when accessing AI platforms, with age-appropriate guidance on safe and ethical use.
- Train staff to identify risks such as plagiarism, deepfake images, harmful chat outputs, and misinformation.
- Educate pupils to critically assess AI-generated information, recognising bias or inaccuracy.
- Include AI in safeguarding audits, ensuring risks are reported to the DSL and governors.

Misuse of AI for bullying, harassment, or sexualised image creation will be treated as a safeguarding issue and managed under the school's behaviour and safeguarding procedures.

Smart Glasses and Wearable Camera/AI Devices

For the purposes of this policy, smart glasses and wearable camera/AI devices include any glasses, headsets or wearable technology capable of taking photographs, recording video or audio, livestreaming, accessing online content, using artificial intelligence, or transmitting data. This includes, but is not limited to, Meta/Ray-Ban smart glasses and similar devices.

Pupils are not permitted to wear or use smart glasses or wearable camera/AI devices on the School site during the School day. Such devices must not be used in lessons, corridors, dining areas, changing rooms, toilets, boarding transition periods during the School day, or any other School activity unless explicit permission has been granted by a senior member of staff for a specific educational or accessibility purpose.

The School recognises that these devices can present safeguarding, privacy and data protection risks, particularly because they may allow images, video, audio or livestreams to be captured without the knowledge or consent of pupils, staff, visitors or members of the wider School community. Misuse may also contribute to bullying, harassment, sharing of inappropriate images, examination malpractice, breaches of privacy, or other safeguarding concerns.

Boarding pupils who own smart glasses or wearable camera/AI devices may only use them during their own leisure time, outside the School day, and only in a manner that is safe, respectful and appropriate. Boarders must inform boarding staff before using such devices, including where they intend to use them and for what purpose. Use is not permitted in

bedrooms shared with others, bathrooms, toilets, changing areas, medical spaces, during prep, or in any situation where another person may reasonably expect privacy.

Any photography, video recording, audio recording, livestreaming or AI-enabled capture involving another person must only take place with clear permission from those involved and must never be covert, intrusive, humiliating, sexualised, discriminatory or harmful. Pupils must stop recording immediately if asked to do so by any pupil, member of staff or visitor.

Where smart glasses or wearable camera/AI devices are used inappropriately, the School may confiscate the device, investigate the incident under the behaviour and safeguarding policies, require deletion of images or recordings where appropriate, inform parents, and refer the matter to the DSL. Where there is concern that images or recordings may be indecent, coercive, abusive, discriminatory, threatening, or otherwise harmful, the matter will be treated as a safeguarding concern and external agencies may be contacted where appropriate.

The School reserves the right to prohibit a pupil from bringing smart glasses or wearable camera/AI devices onto the School site or into boarding where there are safeguarding, privacy, conduct or wellbeing concerns.

REMOTE LEARNING

74. Where children are being asked to learn online at home the Department has provided advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. The NSPCC and PSHE Association also provide helpful advice:

a. NSPCC Learning - Undertaking remote teaching safely during school closures; and

b. PSHE - PSHE Association coronavirus hub.

75. Communication with parents is used to reinforce the importance of children being safe online and parents and carers understand what systems the school uses to filter and monitor online use. Parents and carers are aware of what their children are being asked to do online (via SMHW or email), including the sites they will asked to access and who their child is going to be interacting with online.

CYBERCRIME

76. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

77. Cyber-dependent crimes include:

a. unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

b. denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

c. making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

78. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Broader guidance on cyber security including considerations for governors can be found at: Cyber security training for school staff – NCSC.GOV.UK

Additional link for 'Harmful online challenges and online hoaxes' - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes

RESPONSE TO BULLYING

79. Tettenhall College will take firm and decisive action to deal with any incident of bullying/cyberbullying which is witnessed by or reported to any member of staff by parents,

pupils or staff. Teachers have the power to discipline pupils for misbehaving outside the School premises 'to such an extent as is reasonable'. Where bullying outside School is reported to School staff, it should be investigated and acted upon.

80. Sharing of nudes or semi-nudes images and/or videos incidents will follow child protection procedures. Tettenhall College will respond proportionately, taking care not to further traumatise the victim by imposing unwarranted sanctions upon them. 'Sharing nudes and semi-nudes: how to respond to an incident' offers guidance on appropriate courses of action and considerations when handling an incident.

Post incident responses for the victim

81. When a member of staff receives information, either directly or indirectly, that a child may have been the victim of a bullying incident, this report will be taken seriously, investigated and written records kept. The incident may be investigated by the Tutor /Head of Section or a Senior Leader.

82. Tettenhall College will offer a proactive, sympathetic and supportive response to children who are the victims of bullying. The exact nature of the response will be determined by the particular child's individual needs and may include:

a. immediate action to stop the incident and secure the child's safety;

b. positive reinforcement that reporting the incident was the correct thing to do;

c. reassurance that the victim is not responsible for the behaviour of the bully and that they are being taken seriously and that they will be supported;

d. strategies to prevent further incidents;

e. sympathy and empathy;

f. counselling;

g. befriending;

h. assertiveness training;

i. extra supervision/monitoring;

j. creation of a support group;

k. peer mediation/peer mentoring;

l. informing/involving parents;

m. adult mediation between the perpetrator and the victim (provided this does not increase the victim's vulnerability); and

n. arrangements to review progress.

Post incident responses for the bully

83. Tettenhall College takes bullying behaviour very seriously and will adopt a supportive, pragmatic, problem-solving approach to enable bullies to behave in a more acceptable way. Tettenhall College understands that certain punishment may not be appropriate in managing this problem, but the positive use of sanctions can be useful in demonstrating to bullies that their behaviour is unacceptable and encourages the promotion of positive change.

84. The School will respond to incidents of bullying behaviour in a proportionate way – the more serious the cause for concern the more serious the response. When sanctions are felt to be necessary they will be applied consistently and fairly. The following options will be considered:

a. immediate action to stop an incident of bullying in progress;

b. engagement with the bully to reinforce the message that their behaviour is a breach of School rules and is unacceptable;

c. loss of lunch/break time privileges;

d. detention;

e. daily/ Headmaster's report;

f. removal from class/group;

g. withholding participation in sports or out of School activity (if not essential part of curriculum);

h. parents informed;

i. counselling/instruction in alternative ways of behaving;

j. adult mediation between the perpetrator and the victim (provided this is safe for the victim);

k. temporary exclusion;

l. permanent exclusion (in extreme cases of severe and persistent bullying which may involve violence); or

m. rewards/ positive reinforcement for children in order to promote change and bring unacceptable behaviour under control.

Monitoring and Review of the Bullying policy

85. This policy is reviewed annually to ensure that it is working as effectively as possible. The whole School community is made aware of ways of reporting incidents of bullying. Bullying is reported to a member of School staff who will then report it to his or her line manager, and the appropriate action will be taken. A school cannot be considered to meet its duty of care towards its pupils if it does not readily have a clear picture of bullying incidents throughout the school, whatever system has been chosen to record concerns. At Tettenhall College, all pupil incidents are recorded via 'Pupil Notes' on iSAMS. All sanctions

are also recorded on iSAMS via the 'Behaviour Manager' tab. A central bullying register is kept by the Assistant Head (Pastoral), who takes it to Safeguarding Committee meetings whenever there are additions to the register, so that the Committee can monitor incident numbers, identify where bullying is recurring between the same pupils and ensure that the approach by the School is consistent.

Conclusion

86. At Tettenhall College we do not accept that bullying is an inevitable part of School life. No-one should have to suffer bullying. It is up to all of us to act when bullying happens, to us or to others.

CHILD PROTECTION POLICY

87. Copies may be requested from the Headmaster's office.

Policy Statement

88. Everyone employed by Tettenhall College has a responsibility in relation to child protection from EYFS to the Sixth Form. In most cases this will be the referral of concerns to the appropriate Designated Safeguarding Lead. In day-to-day contact with children at risk, staff have an opportunity to note concerns and to meet with parents and other associated adults.

89. Increasingly, schools are expected to work with, support and sometimes lead different agencies to enable the most appropriate form of intervention to take place. This policy aims to outline the role that the School will have, the procedures that staff should take and guidance on issues related to child protection generally. It is not exhaustive. All staff should consider at all times what is in the best interests of the child.

90. It is necessary for the School to have specific guidelines for staff so that our child protection policy is understood and followed by all staff members. It should be pointed out that the guidelines are drawn up with the welfare of the children in mind, but also with the recognition that members of staff have legal responsibilities under the Children Act (1989). Tettenhall College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Colleagues are reminded that members of staff could possibly be involved in legal action if matters of this nature are ignored or not dealt with in the appropriate matter. However, staff who report such matters in good faith will not be subject to disciplinary action if allegations are subsequently discovered to be unfounded.

The Aims of the Policy

a. to raise awareness of individual responsibilities in identifying and reporting possible cases of abuse anywhere in the School form EYFS to the Sixth Form;

b. to provide a systematic means of monitoring, recording and reporting of concerns and cases;

c. to provide guidance on recognising and dealing with suspected child abuse;

d. to provide a framework for multi-agency communication and effective liaison; and

e. To identify strategies and interventions available to support children at risk.

91. Physical, emotional and sexual abuse, neglect or exploitation of children does occur, and we need to be watchful for signs of such abuse from EYFS to the Sixth Form. Children can be particularly vulnerable in boarding settings, and we should be alert to pupil relationships and the potential for peer abuse. We recognise that sexualised abuse, including verbal abuse, by peers is a potential safeguarding issue. It would be easy to think that such things could not happen to children at Tettenhall College, but any school could be deluding itself as a number of institutions have recently found out to their cost.

Children potentially at greater risk of harm

Children who need a social worker (Child in Need and Child Protection Plans)

92. Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

93. Local authorities will share the fact a child has a social worker, and the Designated Safeguarding Lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

94. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children requiring mental health support

95. Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.

96. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the 'Mental health and behaviour in schools' guidance'. Public Health England has produced a range of resources to support schools (See Rise Above for links to all materials and lesson plans).

Signs to watch out for:

a. bruising or markings that cannot be accounted for by a known physical injury, or participation in games, or as the result of a child's normal activity;

b. signs of depression;

c. signs of unpredictable mood swings;

d. being withdrawn;

e. unusual seeking of attention; or

f. deterioration in appearance and personal hygiene.

97. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

98. All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime.

Children with special educational needs and disabilities or health issues

99. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

100. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

(a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

(b) these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children

(c) the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs, and

(d) communication barriers and difficulties in managing or reporting these challenges.

(e) cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

103. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO. Extra pastoral support and attention for these children will be provided, along with ensuring appropriate support for communication.

104. Further information can be found in the Department's:

(a) SEND Code of Practice 0 to 25, and

(b) Supporting Pupils at School with Medical Conditions.

(c) And from specialist organisations: Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

(d) Council for disabled children - Every Local area has an information, advice and support service, providing information, advice and support to disabled children and young people, and those with SEND, and their parents.

(e) The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Local IAS service (councilfordisabledchildren.org.uk)

Children who are lesbian, gay, bi, or trans (LGBT)

105. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

106. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

107. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum (Please see our policy for more information).

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

108. CCE and CSE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in sexual or criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved for the purpose of exploitation.

Child Criminal Exploitation (CCE)

109. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories,

shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

110. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

111. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Further information about CCE including definitions and indicators is included in Annex B.

112. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/ third sector providers who offer support to victims of county lines exploitation.

113. A number of the indicators for CSE and CCE as detailed below may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

a. go missing and are subsequently found in areas away from their home;

b. have been the victim or perpetrator of serious violence (e.g. knife crime);

c. are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;

d. are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;

e. are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;

f. owe a ‘debt bond’ to their exploiters;

g. have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office –

https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

Other indicators of CCE and CSE:

a. children who appear with unexplained gifts or new possessions;

b. children who associate with other young people involved in exploitation;

c. children who suffer from changes in emotional well-being;

d. children who misuse drugs and alcohol.

e. go missing for periods of time or regularly come home late; and

f. regularly miss school or education or do not take part in education.

MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM

114. Modern Slavery and the National Referral Mechanism Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including:

a. sexual exploitation,

b. forced labour,

c. slavery,

d. servitude,

e. forced criminality

f. removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

TYPES OF CHILD ABUSE, NEGLECT AND SERIOUS VIOLENCE

115. All School 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.

116. Abuse: a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. Abuse can take place wholly online or technically may be used to facilitate offline abuse.

117. Abuse does not necessarily mean physical harm and it can include children witnessing ill treatment of others. Harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

Child on Child Abuse

118. All staff should recognise that children are capable of abusing other children (including online). The different forms child on child abuse can take are found below:

119. Different gender issues can be prevalent when dealing with child on child abuse, for example sexual violence and sexual harassment, consensual and non-consensual sharing of nudes and semi – nudes images and/or videos (or youth produced sexual images), initiation/ hazing-type violence and rituals, but abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. It is more likely that girls will be victims and boys' perpetrators, but all child-on-child abuse is unacceptable and should be taken seriously. This type of child-on-child abuse can happen to any child inside and outside of school and online. Even if there are no reports of child-on-child abuse, it could still be happening and staff should report any concerns to the DSL.

120. Upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm, is a criminal offence. Anyone of any gender, can be a victim.

121. Bullying (including cyberbullying, prejudice-based and discriminatory bullying).

122. Abuse in intimate personal relationships between children (also known as teenage relationship abuse).

123. Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.

Recording and Monitoring of Child-on-Child Abuse: All reports, disclosures, allegations, concerns and incidents relating to child-on-child abuse, including sexual harassment, sexual violence, harmful sexual behaviour, discriminatory behaviour, online abuse, bullying and cyberbullying, will be recorded on CPOMS and reviewed by the DSL or a Deputy DSL. The School will maintain oversight of incidents to identify patterns, trends, repeat perpetrators, repeat victims and any emerging safeguarding concerns. Child-on-child abuse data and trends will be reviewed through Safeguarding Committee meetings and reported to Governors as appropriate.

Physical abuse

124. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child (this may include an online element which facilitates, threatens and/or encourages physical abuse). Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately

causes, ill health to a child whom they are looking after. This situation may be described as fabricated or induced illness by carer.

125. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Emotional abuse

126. Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may also involve not giving the child the opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.

Sexual abuse

127. 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, including penetrative or non-penetrative acts. This can include causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse is also part of this type of abuse. Non-contact activities may also be included, such as involving children in looking at, or in the production of, pornographic material, or in watching sexual activities, or encouraging children to behave in sexually inappropriate ways (this may include an online element which facilitates, threatens and/or encourages sexual violence). The sexual abuse of children by other children is a specific safeguarding issue also known as child-on-child abuse.

Support is available from: Centre of Expertise on Child Sexual Abuse (online). It has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

Neglect

128. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Useful advice about signs of abuse is in 'What to do if you're worried a child is being abused' (https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2%20).

SERIOUS VIOLENCE

129. There are several indicators which may signal children are at risk from or are involved with serious violent crime. These may include:

a. increased absence from school,

b. a change in friendships or relationships with older individuals or groups,

c. a significant decline in performance,

d. signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

e. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

130. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

a. being male,

b. having been frequently absent or permanently excluded from school,

c. having experienced child maltreatment and having been involved in offending, such as theft or robbery.

131. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

CHILD SEXUAL EXPLOITATION (CSE)

132. Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where anyone under the age of 18 is persuaded, coerced or forced into sexual activity in exchange for, amongst other things, money, drugs/ alcohol, gifts, affection or status. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

133. Sexual exploitation results in children and young people suffering harm and causes significant damage to their physical and mental health. Some young people may be

supported to recover, whilst others may suffer life-long impairments, which may, on occasion, lead to their death, for example through suicide or murder.

134. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

135. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

136. Consent is irrelevant, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and may occur online.

137. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. Further information about CSE including definitions and indicators is included in Annex B.

138. Some additional specific indicators that may be present in CSE are children who:

a. have older boyfriends or girlfriends; and

b. suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

139. Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

140. When assessing whether or not a young person is experiencing or at risk of sexual exploitation, it is important to consider the issue of consent:

a. Under 13s are not legally capable of consenting to sex (statutory rape) or any other type of sexual touching;

b. Sexual activity under 16 is an offence;

c. It is an offence for a person holding a position of trust or authority in relation to a 16- or 17-year-old to have a sexual relationship; and

d. Incapacitated victims (alcohol, drugs, family that has been threatened/ experienced violence) cannot give true consent.

141. Behaviour and risk indicators:

a. Lacking friends from the same age group;

b. Unsure about sexual orientation;

c. Low self-esteem or self-confidence;

d. Older 'boyfriend' or 'girlfriend';

e. Physical injuries;

f. Suffering from sexually transmitted infections or becoming pregnant;

g. Evidence of sexual bullying and/ or vulnerability through the internet and/ or social networking sites;

h. Disclosures made then withdrawn;

i. Unexplained money or gifts and unexplained mobiles;

j. Absence from School;

k. Bullying in or out of School;

l. Change in physical appearance;

m. Self-harm or thoughts of/ attempts at suicide.

PROCEDURE

142. If there is a safeguarding concern, governing bodies, proprietors and school leaders will ensure the child's wishes and feelings are considered when determining what action to take and what services to provide.

143. Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Decisions on information sharing will always be in the best interest of the child.

144. Pupils are advised to speak to their Form Tutor, Head of Year or any other member of staff they wish if they have any concerns about themselves or peers. Alternatively, they can e-mail if they find that easier. Pupils are reminded of this procedure during tutor time and in PSHE lessons.

145. Pupils are also advised that their concerns will be treated seriously, and that they can safely express their views and give feedback.

Allegations of abuse or instances of abuse by one pupil or more pupils against another (child on child abuse)

146. The expectations regarding acceptable behaviour towards other pupils is made clear through the School's code of conduct, anti-bullying policy, PSHE lessons, form periods and assemblies. Where a pupil (or a member of staff or a volunteer) makes an allegation about the behaviour of a pupil or pupils against another pupil, and that there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm (including sexting, banter, gender-based issues), the allegation must be reported to the DSL. The relevant child protection procedures outlined in this policy will then be adhered to.

147. A thorough risk-assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities where appropriate) is carried out by the DSL with a view to ensuring the safety of all pupils and that both alleged victims and perpetrator pupils receive appropriate support. Decisions arising might include, for example, whether the accused pupil should be removed from the School for a period, or from certain classes, whether sleeping arrangements should be changed for boarders, whether contact with certain individuals should be prevented or supervised, the availability of counselling etc.

Safeguarding concerns and allegations made about staff, including supply teachers, volunteers, contractors and outside organisations or individuals using school premises

148. The statutory guidance, 'Dealing with allegations of abuse against teachers and other staff' is contained at part four of KCSIE. This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors, has (These are known as 'harm thresholds'):

a. behaved in a way that has harmed a child, or may have harmed a child;

b. possibly committed a criminal offence against or related to a child;

c. behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or

d. behaved or may have behaved in a way that indicates they may not be suitable to work with children.

149. Allegations of abuse made against any member of staff (including supply staff, volunteers, contractors or any individuals using the school premises) must go straight to the Headmaster without delay for investigation of the allegation. If he is absent, or the allegation is against the Head or a member of the governing body, then the person receiving the allegation will pass it directly to the Chairman of Governors, Mr Jeremy Woolridge, without informing the Head. Contact details for the Chair of Governors may be sought from the School Office or a member of SLT. An allegation against the Chair of Governors should be reported immediately to the Designated Officer or DO (formerly known as the Local Authority Designated Officer or LADO). In cases of serious harm, the police will be notified from the outset (101).

150. The Headmaster (or Chairman of Governors) will:

a. establish the facts taking care not to do anything that may jeopardise an investigation by external agencies, including the police;

b. take immediate steps to 'safeguard' all pupils in the School. Such steps might include suspension of the member of staff (part or full time) or volunteer; and

c. discuss the allegation with the DO (Kelly Matthews, 01902 550661) without delay. The purpose of this initial discussion is for the DO and the case manager to consider the nature, content and context of the allegation and agree a course of action.

151. If appropriate, the School's disciplinary procedures will be invoked. If the Head, member of staff (full or part time) or volunteer who has harmed, or poses a risk of harm, to a child resigns or is subsequently dismissed or redeployed, the Disclosure and Barring Service (DBS) will be informed as soon as possible at PO Box 3963, Royal Wooton Bassett, SN4 4HH, Tel 03000 200 190. It is also the School's obligation to respond to requests from the DBS for information it holds. Where the School has made a referral to the DBS, a referral to the Teacher Regulation Agency (TRA) must also be considered; advice should be sought from the DO on this matter to determine the correct course of action. Throughout the process, the School will ensure that all effective links are developed with relevant agencies and will cooperate fully with any enquiries to 'safeguard' children at the School.

152. Where a teacher is dismissed or the school ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK. Advice should be sought from the DO on this matter to determine the correct course of action.

153. When dealing with allegations of abuse:

a. procedures need to be applied with common sense and judgement;

b. records which contain information about allegations of sexual abuse should be retained by schools for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of the enquiry;

c. records must be kept of all other allegations against staff until the accused has reached normal pensionable age or a period of 10 years from the date of the allegation if that is longer, but any that are not substantiated, are unfounded or malicious should not be referred to in employer references;

d. allegations found to be malicious should be removed from personnel records.

154. The School will make every effort to maintain confidentiality and guard against unwanted publicity. This applies up to the point where the accused person is charged with an offence, or the DfE/ TRA publish information about an investigation or decision in a disciplinary case.

155. Further guidance as to how to handle allegations against supply teachers is contained at part four of KCSIE.

CONCERNS THAT DO NOT MEET THE HARM THRESHOLD (LOWER LEVEL)

156. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

a. is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

b. does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the DO.

157. Examples of such behaviour could include, but are not limited to:

a. being over friendly with children;

b. having favourites;

c. taking photographs of children on their mobile phone;

d. engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

e. using inappropriate sexualised, intimidating or offensive language

158. Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the DSL. Where a low-level concern is raised about the DSL, it should be shared with the Headteacher.

159. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

160. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

161. These records will be kept securely by the DSL and will comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information).

162. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the DO.

What to do if you suspect a child is being abused, neglected or exploited.

163. If any member of staff suspects that a child in any part of the School from EYFS to the Sixth Form is being abused, neglected or exploited, the most important point is that the matter should not be kept to oneself or dealt with purely personally.

164. The Department for Education has produced advice What to do if you're worried a child is being abused (March 2015) to help practitioners identify child abuse and neglect and take appropriate action in response (https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2%20).

165. Recording should be factual, non-emotive and non-judgmental **N.B.** An allegation of child abuse, neglect or exploitation may lead to criminal investigation, so don't do anything that may jeopardise a police investigation, such as ask a child leading questions or attempt to investigate the allegations of abuse. The recording of any potential child protection issues should be completed on CPOMS, which will immediately alert the DSL.

166. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

167. Ensure that the child is not in need of immediate medical attention.

168. Discuss the matter immediately with the DSL, Headmaster or Chairman of Governors as appropriate.

169. Where there are concerns that a child is at risk of significant harm, Multi-Agency Safeguarding Hub (MASH) will be contacted (01902 555392) by the DSL without delay (and then in writing within one hour). Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that as much information as possible is provided by the school as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. For our registered setting and EYFS, the Designated Safeguarding Lead will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations as soon as is reasonably practical, but at the latest within 14 days. If any allegations were to be made against staff, then the disciplinary procedure would be followed.

170. In the boarding houses, if any allegations were to be made about the resident staff, then arrangements to provide alternative accommodation away from the child concerned would be made, pending any investigation of a child protection nature. The School would

also ensure that all effective links are developed with relevant agencies and co-operate, as required, with their enquiries regarding child protection matters, including attendance at case conferences. Boarders and their parents are informed by the School how they can contact Ofsted and the LADO (Kelly Matthews, 01902 550661) regarding any complaints concerning their welfare; this information is outlined in the complaints procedure for parents and displayed in both houses for pupils.

171. If neither the Headmaster nor DSL is willing to take the matter further, then the member of staff is perfectly entitled to contact the Multi-Agency Safeguarding Hub (MASH) will be contacted personally (01902 555392/ 552999).

172. If, however, it is decided by all not to take the matter further, then a record must be kept indicating the nature of the original concern and the reason why it was not taken further.

173. In cases of serious harm, the police will be notified by the DSL from the outset (101).

174. Charity Commission guidance on charity duties to safeguard children is available at GOV.UK (For schools with charitable status).

How to react if you are told of abuse, neglect or exploitation

175. If a child tells a staff member of actual abuse, neglect or exploitation:

a. listen to the child, noting changes in behaviour, presentation or demeanour;

b. reassure the child that he/she is doing the right thing to inform a staff member about it and he/she is being taken seriously and that they will be supported and kept safe. They should never be made to feel ashamed or that they have created a problem by reporting abuse, sexual violence or sexual harassment;

c. avoid unnecessary physical contact (this could put you at risk of allegation);

d. do not make any unwise promises of confidentiality;

e. explain that you will need to share the information you are being given with people who know how to help;

f. allow the child to lead the discussion if a disclosure is made, but do not press for details by asking leading questions, e.g. “what did they do next?”;

g. record the conversation as soon as possible after the conversation has finished. Record accurately what the child has said, using the child’s terminology. Time (to the nearest minute), date and sign the record. Do not ask the child to read/ sign the record or write down the information themselves; and

h. share the information appropriately without delay via CPOMS in the first instance

Remember the welfare of the child is of paramount importance. If a child withdraws the allegations at this point, you must still take further action. Staff members must not ignore the matter or keep the matter to themselves; they must not attempt to make a physical examination of the child or to be involved in detailed cross-examination. The child’s family

must not be contacted, but instead the matter must be passed on immediately to the DSL, Headmaster or Chairman of Governors, who must then inform MASH and, for EYFS, Ofsted.

Procedures for Monitoring, Recording and Reporting

176. The School policy is that brief notes should be taken at the time of the incident or immediately thereafter, with the subsequent completion of an incident record on CPOMS. A Body Map should be used to document injuries that are deemed to be non-accidental (see Body Map policy in Staff Handbook – this can also be completed on CPOMS). All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded. Information should be kept confidential and stored securely. Records should include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any action taken; decisions reached and the outcome. Records may be used in legal proceedings and must be kept accurate and secure. All records should be forwarded to the DSL and should include factual information rather than assumption or interpretation. The child's own language should be used to quote rather than a translation. Records may be used at a later date to support a referral to an external agency. When a member of staff other than the DSL has been asked to speak to an outside agency by phone, the DSL should be present to record what has been said. This would be made clear to the outside agency.

Identification of injury from abuse

177. If a child has sustained an injury which might be the result of abuse by the parents/guardians etc. a staff member must:

a. obtain immediate medical help

b. not contact parents or guardians personally

c. inform the DSL and the Headmaster who will then inform MASH and, for EYFS, Ofsted.

178. If all are in agreement that parents should be contacted by the School, this is the responsibility of the Headmaster or the DSL.

RESPONSIBILITIES - **check phone numbers and contact names below before finalising doc.*

Designated Safeguarding Lead (DSL)

179. The DSL is Mr Simon Sherratt, the Assistant Head Pastoral (07447893289). He is assisted by Mrs Amanda Marshall Walker (Head of Preparatory School) as a DDSL – (07848518393)

180. There should always be cover for these roles. The DSL and DDSL are assisted by a number of Level 3 safeguarding trained staff members.

a. understands the importance of information sharing, both within School, with Local Safeguarding Partners (LSPs), other agencies, organisations and practitioners;

b. will co-ordinate action within the School and liaise with LSPs and other agencies over cases of abuse and suspected abuse;

c. will make immediate contact with **the Wolverhampton Multi-Agency Safeguarding Hub (MASH)** (01902 555392 / 01902 552999 out of hours) in relation to a matter outside School, or to the LADO (01902 550661 **LADO@wolverhampton.gov.uk**) in relation to someone working in the School, or to the police (**101 or 999 in an emergency**) if a criminal offence is suspected. 'When to call the police' guidance from the NPCC should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do;

d. Will not alert parents if to do so would increase risk to the child;

e. Will report incidents by telephone to the BSA safeguarding lead in accordance with the terms of the Commitment to Care Charter (0207 798 1580 / 07905 127650). Will report only that it has happened, and it has been reported to the relevant authorities. Will identify whether it is recent, non-recent, peer-on-peer or media reporting, and the type of abuse (sexual, physical, neglect, emotional). No details are required. The thresholds for reporting are:

i. Recent abuse: an allegation or incident of abuse by an adult inside School on a pupil that has been taken on by the DO.

ii. Non-recent abuse: an allegation not concerned with a current pupil if a police investigation is under way.

iii. Peer-on-peer: any form of peer-on-peer abuse that has been reported to police.

iv. Media reporting: allegations of abuse of which the School was previously unaware that are reported by the media or on social media.

f. will maintain close links with Local Safeguarding Partners (LSPs) and the DO and preserve a distinction between children at risk of suffering serious harm (section 47) and children in need of additional support from one or more agencies (section 17);

g. will act as a source of advice within the School;

h. will ensure that staff are familiar with local safeguarding procedures and training opportunities;

i. will make child protection referrals;

j. if required to do so by Children's Services, will confirm any telephone referral in writing within one hour by completing an E-MARF (Multi-Agency Referral Form), which can be accessed via the Wolverhampton Safeguarding Together Partnership website;

k. make follow-up calls if the LSP does not acknowledge receipt of the referral within one working day with a decision about next steps (including type of response that is required and whether to see the child if further assessment is required);

l. will liaise with agencies about individual cases;

m. will organise training on child protection, including online safety, within School;

n. will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place);

o. will undertake appropriate DSL training, updated at least every two years, and maintain knowledge and skills through regular safeguarding updates, briefings and professional development;

p. will liaise with the IT Director / Systems Manager to ensure that filtering and monitoring systems are reviewed at least annually, are effective in protecting pupils from harmful content and are operating in accordance with the Department for Education Filtering and Monitoring Standards and Cyber Security Standards for Schools and Colleges;

q. will ensure that Mrs C Troughton is kept informed of any referrals;

r. will ensure that safeguarding concerns, child protection records, welfare concerns, child-on-child abuse concerns and associated actions are recorded appropriately and securely on CPOMS;

s. will hand over the child protection file securely when a child moves school; and

t. will provide appropriate feedback to members of staff regarding safeguarding concerns and outcomes, where it is proportionate and appropriate to do so.

u. will provide safeguarding updates, reports and assurance information to the Proprietor, Governors and Safeguarding Committee as required.

The Governing Body

179. The Governing Body is under a statutory duty to cooperate with local safeguarding arrangements and will be fully engaged, involved and included.

180. The three Local Safeguarding Partners (the local authority, a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area) make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The Governing Body is prepared to supply information as requested by the three safeguarding partners.

181. The Governing Body will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice. Further details on information sharing can be found in 'Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR'.

182. The Nominated Safeguarding Governor and other members of the Governing Body will:

a. be responsible for undertaking regular (annual) reviews of the procedures that apply to child protection and of the efficiency with which the related duties have been discharged and to that end, a College-wide Safeguarding Committee has been established, involving Simon Sherratt (DSL), , Mrs Amanda Marshall Walker (Head of the Preparatory School) will assist in the Early Years aspects of child protection, Justin Gomersall (Headmaster), Surgery, Catharine Hammond (Nominated Safeguarding Governor) and Sarah Isbister (Governor);

b. ensure clear systems and processes are in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

c. be prepared to supply information as requested by LSPs;

d. ensure induction and training of staff is in line with advice from LSPs (to include regular updated safeguarding and child protection training and online safety - including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;

e. ensure arrangements are in place setting out process and principles for sharing information in School, with LSPs and with other organisations, agencies and practitioners as required;

f. ensure there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children.

g. ensure relevant staff are aware that the Data Protection Act 2018 (DPA 2018) contains 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.;

h. Governing bodies and proprietors should be aware of 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. Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).

i. ensure that children are taught about safeguarding, including online safety. This may include covering relevant issues through Relationships Education (for

primary pupils) and Relationships and Sex Education (for secondary pupils), and/or where delivered, through Personal, Social, Health and Economic (PSHE) education.

j. ensure appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. The effectiveness of these should be regularly reviewed. Governors should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system, and the proportionality of costs verses safeguarding risks.

k. ensure that there are appropriate arrangements made to keep children safe when the school facilities are hired to organisations or individuals. Where services or activities are provided separately by another body, the governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

l. be responsible for receiving and discussing updates provided by the DSL; and

m. remedy any deficiencies or weaknesses in child protection arrangements without delay.

Safeguarding Governance Oversight

The Designated Safeguarding Lead (DSL) will work in partnership with the Nominated Safeguarding Governor to ensure that the above arrangements are embedded, monitored and reviewed through termly Safeguarding Committee Meetings, chaired by the DSL. These meetings will provide appropriate oversight, challenge and quality assurance of the School's safeguarding arrangements.

School Staff

183. School staff should:

a. be alert to the signs of abuse as detailed in this policy;

b. not assume another colleague or professional will take action and share information that might be critical in keeping children safe;

c. understand that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing

information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children;

d. report any concerns immediately to the DSL, via an incident report on CPOMS;

e. do everything they can to support social workers;

f. consult with the DSL if in any doubt as to how to proceed; and

g. follow the advice given in this policy in relation to how to handle disclosures.

Schools should not under the GDPR as supplemented by the Data Protection Act 2018 provide pupils' education data where the serious harm test under that legislation is met. Therefore, in a situation where a child is in a refuge, this could mean that schools can withhold education data under the GDPR; they should do so where it would be in the best interests of the child.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

Partnerships with Parents

184. It is important that the School has an established approach to working with parents. Parents' and children's need for privacy should be respected. However, the priority is the needs of the child and effective liaison is crucial for this.

185. It should be recognised that families from different backgrounds and cultures will have different approaches to child-rearing. These differences should be acknowledged and respected provided they do not place the child at risk as defined later in this policy.

186. Where possible School staff should work with and share information with parents. Permission for liaison and information sharing with outside agencies should be sought unless it places the child at risk. In these cases, it is preferable to seek advice from social care or make a child protection referral.

MULTI-AGENCY LIAISON

Social Care Meetings

187. At times School staff will be called to participate in meetings organised and chaired by social care. these might include:

a. register reviews;

b. case conferences;

c. professionals' meetings in which representative professionals from different agencies are asked to meet to discuss children and their families with a view to providing support or making recommendations in terms of next stages of involvement; and

d. core group meetings in which a “core” group of professionals associated with the family are asked to meet to review the progress of actions decided at case conferences and register reviews.

188. At these meetings, representatives, normally the Headmaster or the DSL, from the School should be ready to report back providing information about:

a. attendance and punctuality;

b. academic achievement;

c. child's behaviour and attitude;

d. relationships with peer group and social skills generally;

e. child's appearance and readiness for School;

f. contact with parents/carers; and

g. any specific incidents that need reporting.

189. Prior to the meeting, teachers and other adults working closely with the child will be asked for their comments. Following the meeting feedback will be given and staff brought up to date with any actions that are needed.

CARE REGISTER AND CONFIDENTIALITY

190. Where children are on the child protection register and leave one school for another, the DSL must inform the receiving school and the key worker. If the child leaves the School with no receiving school, details should be passed to the principal education social worker (ESW).

191. All staff have a professional responsibility to share relevant information about the protection of children with the investigative agencies. Members of staff should not promise confidentiality but can let the child know that only those who need to know will be informed and always for the child's own sake.

192. Staff should be careful in subsequent discussions and ensure that information is only given to the appropriate person. All staff should be kept aware of issues relating to confidentiality and the status of information they may hold.

193. Members of staff, other than the DSL and those involved closely, should only have enough details in order to help them to act sensitively and appropriately to a pupil. Sensitive information regarding pastoral issues for children on the child protection register should be kept separately in a folder in the closed section of the office. Discretion should be used when talking about the personal and changing circumstances of children, e.g. when a child goes into care.

Supporting Children at Risk

194. For children at risk, school may be the one stable place from which they can expect security and reassurance. It is not only about being alert to potential abuse but providing the support to help children through difficult times and the coping skills that can help avoid situations arising and deal with the emotional difficulties afterwards if they do.

The Personal Education Plan

195. Children who are “looked after” will have their own personal education plan (PEP). The PEP is part of the care plan. It is a record of what needs to happen in order to enable the young person to “fulfil their potential”. It should reflect other education plans such as IEPs.

Support in School

196. All class teachers and year group leaders are responsible, in conjunction with other School staff, for the pastoral needs of the children in their care. This includes maintaining opportunity for children to share their concerns and follow the guidance in this document. Care should always be taken in regard to the discussion of sensitive issues and advice should be sought where there are concerns.

197. Children should understand the risks posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise other people.

198. Pupils are taught about safeguarding, including online, through the curriculum and PSHE, to help them to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: Teaching about relationships sex and health. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may also help schools and colleges understand and teach about safeguarding:

a. DfE advice for schools: teaching online safety in schools;

b. UK Council for Internet Safety (UKCIS)32 guidance: Education for a connected world;

c. UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people;

d. The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors;

e. National Crime Agency's CEOP education programme: Thinkuknow;

199. Within the curriculum there will also be opportunities to discuss issues which some children might find sensitive. Care should be taken particularly in relation to discussion about families and their make-up. Assumptions about members of families and the presence of both parents should be avoided both in discussion and the presentation of materials. During health and safety and sex education lessons, staff should be alert to the fact that some children will have very different experiences and may find content at odds with their own experiences. Staff should make themselves familiar with the background of their pupils in order to avoid distress.

CHILD PROTECTION STATEMENT FOR NURSERY IN HOLIDAY TIME

200. Pre-Prep Adventurers holiday provision remains open throughout holiday periods and the staff are employed all year round to ensure consistency for our parents and their children. In the event of a child protection issue developing, the staff will continue to follow the procedure in the Child Protection policy above and contact Mrs Amanda Marshall-Walker(Head of the Preparatory School) or the Headmaster on the private numbers provided or through the Bursar's Office.

201. However, in the event of an issue of concern arising and all of the above not being contactable, the member of staff should contact MASH direct.

202. The relevant contact numbers for MASH can be found on the notice boards in the Nursery.

PREVENT DUTY

203. Prevent is just another form of safeguarding, a way of offering support and intervention if someone is on a pathway to extremism.

204. Schools are required to have due regard to the need to prevent people from being drawn into terrorism. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

205. In this respect, Wolverhampton is classed as a non-priority area (Tier 3) by the Home Office and there have been low referral rates. However, in some areas of the city there are very entrenched right-wing views – the former leader of the English Defence League was resident in the city.

206. KCSIE was updated in September 2016 to take account of the Prevent duty provisions. The national statutory guidance from the Home Office (Prevent Duty Guidance for England and Wales, July 2015, revised April 2019, further revisions April 2021, revised December 2023, updated March 2024) and sector specific advice from the Department for Education (The Prevent Duty: Departmental Advice for Schools and Childcare Providers, August 2015, updated September 2023) places the following expectations on schools:

a. Communicate and promote the importance of the Prevent duty to staff. Every teacher needs to be aware of the risks posed by online activity of extremist and terrorist groups.

b. Ensure staff understand what radicalisation and extremism mean and why people may be vulnerable to being drawn into terrorism; ensure staff have the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are

shared by terrorist groups; ensure staff know where and how to refer children and young people for further help.

c. Ensure staff implement the Prevent duty effectively;

d. Ensure information is shared between organisations to ensure that people at risk of radicalisation receive appropriate support;

e. Promote fundamental British values through the curriculum and social, moral, spiritual and cultural education;

f. Ensure that pupils are not exposed to staff who support terrorism or who contradict British values;

g. Ensure that any visiting speakers are suitable and appropriately supervised;

h. Ensure children are safe from terrorist and extremist material when accessing the internet in School; and

i. The DSL should be trained in Prevent.

207. All staff were given Prevent training by the DSL in September, and awareness of Prevent duty is included in the induction programme for all new staff.

208. The School has appropriate whistleblowing and safeguarding policies for raising concerns.

209. Assemblies, PSHE, Religious Studies and form periods offer opportunities to promote British values of democracy, the rule of law, individual liberty and mutual respect for, and tolerance of, those with different faiths and beliefs.

210. The organiser must ascertain the information any visiting speaker wishes to communicate to ensure it is appropriate to the age and maturity of the pupils to be in attendance and does not undermine British Values or the ethos and values of the School. The organiser must refuse to allow people/ organisations to use School premises if they have links to extreme groups or movements. Visiting speakers are to be accompanied at all times and are not to be left unsupervised with pupils at any point. In the unlikely event that the talk/ presentation does not meet with the requirements of the School, staff have the right and responsibility to interrupt and/ or stop a presentation.

211. Suitable internet filtering is in place to safeguard children from potentially harmful and inappropriate material on-line without unreasonable 'over-blocking' - the following 'categories' are specifically blocked for pupils: intolerance, terrorism, violence, criminal activity. Internet safety is integral to the ICT curriculum and is embedded in PSHE scheme of work.

212. The below points are factors which together can sometimes contribute to vulnerability. Many of them overlap. The below points have been observed in cases referred for support:

a. Lack of identity and belonging;

b. Feeling of rejection;

c. Social exclusion;

d. Low-self-esteem, low self-worth;

e. Lack of education;

f. Lack of diversity in social experiences; and

g. Mental health conditions and disorders such as depression, anxiety, bi-polar and psychosis.

213. The following 'early warning signs' have all been identified over the last few years:

a. Accessing extremist material online, including through networking sites (e.g. Facebook, YouTube);

b. Graffiti symbols, writing or artwork promoting extremist messages or images;

c. Changes in behaviour and/or friendships;

d. Wearing clothing and/or logos that are indicative of an extremist group;

e. Voicing opinions drawn from extremist ideology or narrative; or

f. Use of extremist or hate terms to exclude others or incite violence;

214. It should be noted that the risk factors can indicate a sense of vulnerability to violent extremism, but extremists will not necessarily display all of these factors, and the presence of even a single risk factor should prompt the staff member to seek advice from the DSL. Such a concern may only be one piece of a larger puzzle; the DSL may already have similar concerns raised by others. This is why it is important for staff to keep a constant dialogue with the DSL and raise any concerns they have, no matter how small they may seem.

215. Remember, these signs are possible indicators that radicalisation or an attraction to extremism may be happening but doesn't always mean it is. However, staff must always report their concerns; they have a statutory duty to do so.

216. If concerns have been raised about a child, then the first person to notify is the DSL who can make an assessment based on the information available. He may ask to speak to the child or young person themselves to pose a series of informative questions to ascertain if it is an isolated incident or indicative of a more worrying mind-set.

217. It may then be necessary to speak with the child's parents and make them aware of the behaviour that has been observed. If the concerns are considered to be more serious, or if repeat incidents occur, then the DSL may decide to contact the Prevent and Cohesion Co-Ordinator at City of Wolverhampton Council Deborah Smith (deborah.smith@wolverhampton.gov.uk or telephone on 01902 551214).

218. In extreme cases the DSL and the Prevent practitioner may submit the case to Channel. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from

the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

219. The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: Channel guidance.

220. There are certain behaviours that go beyond the range of Prevent and, if displayed, will represent a criminal act. Whilst it may be rare to see or hear any of these, it is important to know what they are as, the Police should be alerted in these circumstances:

a. Glorification of terrorism; or

b. Membership of a proscribed extremist group (a list of banned terrorist organisations is available in Schedule 2 of the Terrorism Act, 2000) and is available on the Home Office website.

221. There is a dedicated DfE telephone helpline non-emergency advice for staff and governors: 0800 0113764. Urgent concerns or information about terrorism: 0800 789 321 (24hr confidential hotline) or 999.

SO-CALLED 'HONOUR-BASED' ABUSE (HBA)

222. So-called 'honour-based' abuse (HBA) encompasses incidents or 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 HBA are abuse and should be handled and escalated as such.

223. If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

224. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

225. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

FEMALE GENITAL MUTILATION (FGM)

226. Female Genital Mutilation (FGM) comprises all procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for non-medical reasons. FGM is child abuse and should be dealt with as such.

227. Professionals in all agencies need to be alert to the possibility of a girl being at risk of FGM, or already having undergone FGM. The Wolverhampton population includes communities at high risk of FGM. There is a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Identifying Girls at Risk

228. There are 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:

229. The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM;

a. Any girl born to a woman who has been subjected to FGM;

b. Any girl who has a sister who has already undergone FGM;

c. The majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at higher risk;

d. A professional may hear reference to FGM in conversation, for example a girl may tell other children about it;

e. A girl may confide that she is to have a special procedure or to attend a special occasion to become a woman;

f. A girl may request help if she is aware that she is at risk;

g. Parents state that they or a relative will take the child out of the country for a prolonged period;

h. A girl may talk about a long holiday to a country where the practice is prevalent (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea, Yemen, Afghanistan, Indonesia, Pakistan); or

i. Parents seeking to withdraw their child from learning about FGM.

Indications that FGM may have taken place

230. The following are indicators that should be looked for:

a. Prolonged absence from School or activities;

b. Noticeable behaviour change;

c. Bladder or menstrual problems;

d. A girl may spend longer than normal in the toilet due to difficulties urinating;

e. Difficulty walking, sitting or standing and may even look uncomfortable;

f. Pain between the legs;

g. Talk of something somebody did to them that they are not allowed to talk about;

h. A girl may be reluctant to undergo normal medical examinations; or

i. A girl may confide in a professional, but may not be explicit about the problem due to embarrassment or fear.

What to do if you are concerned about someone who is at risk of FGM?

231. Consult the DSL, who will make a referral to MASH 01902 555392. The potential victim will be referred as a child in need and social care will assess the risk. Alerting the girl's family may place her at increased risk of harm.

232. However, there may be occasions when the DSL may wish to make informal enquiries before making a referral if, for example, a girl has been absent from School for a prolonged period. In these circumstances, it is important not to reveal that enquiries are related to FGM as this may increase the risk to the girl. Further information can be obtained via the Multi-agency guidance on female genital mutilation and the FGM resource pack.

What to do if FGM has already taken place?

233. If a girl discloses FGM or a physical sign of FGM is observed, refer to local police on 101. If it is believed that a girl has been recently cut or is at imminent risk of FGM, consult the DSL. A referral will be made to the police on 999.

234. For more information call the NSPCC FGM helpline on 0800 028 3550 or email fgmhelp@nspcc.org.uk.

FORCED MARRIAGE (FM)

235. Forced Marriage is a marriage in which one or both spouses do not consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure. For help and advice, the 'Forced Marriage Unit' can be contacted on 020 7008 0151 or emailed: fmu@fcdo.gov.uk

Potential Warning Signs or Indicators

236. Warning signs can be subtle or invisible. These indicators are not intended to be an exhaustive list:

a. Truancy;

b. Decline in performance or punctuality

c. Low motivation at School;

d. Poor exam results;

e. Being withdrawn from School by those with parental responsibility;

f. Not allowed to attend extra-curricular activities.

237. Allegations must be taken seriously and follow safeguarding procedures - liaise with the DSL, who will make a referral to MASH, or call 999 if at immediate risk.

238. Do not:

a. Send them away/ minimise their concerns;

b. Approach the family or community;

c. Breach confidentiality or share information inappropriately;

d. Attempt to mediate;

e. Decide that it is not your responsibility to follow up the allegation.

DOMESTIC ABUSE (DA)

239. The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The abuse can encompass, but is not limited to:

a. psychological;

b. physical;

c. sexual;

d. financial; and

e. emotional;

f. coercive and controlling behaviour.

240. The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

241. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

242. Advice on identifying children who are affected by domestic abuse and how they can be helped is available:

a. NSPCC - UK domestic-abuse signs symptoms effects

b. Refuge - what is domestic violence/effects of domestic violence on children

c. Safelives - young people and domestic abuse

d. Domestic abuse: specialist sources of support – www.gov.uk

e. Home: Operation Encompass (information for schools on the impact of domestic abuse)

243. KCSIE 2025 clarifies that children can be affected not only if they experience domestic abuse directly, but also if they **see, hear, or otherwise experience its effects** within the home environment.

244. Furthermore, teenage relationship abuse — where harm arises in young people's own intimate relationships — is also recognised as a serious risk

245. **Tettenhall College will:**

- Train all staff to identify and respond sensitively to signs that a child is impacted by domestic abuse—either at home or in their peer relationships.
- Ensure any disclosures or indicators prompt immediate safeguarding action, including referral to children's social care or police as appropriate.
- Participate in **Operation Encompass**, receiving notifications from the police when a child has been exposed to domestic abuse, and responding with tailored pastoral support the following school day
- Offer access to trusted pastoral staff (e.g., DSLs, school counsellors) in a safe and confidential environment.
- Include domestic abuse awareness in PSHE/RSHE curriculum, teaching pupils about healthy relationships, recognising abusive behaviours, and knowing where to seek help.
- Engage with parents and carers, providing information on available support services, and signposting to local domestic abuse organizations and helplines.

Child on child sexual violence, sexual harassment and harmful sexual behaviour

The school takes a **zero-tolerance approach** to sexual harassment, abuse, and harmful sexual behaviour (HSB) between children.

What is meant by sexual violence and sexual harassment?

246. Sexual violence and sexual harassment can be between two children, or a group of children. Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment. Children with SEND are likely to be more vulnerable.

247. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

248. Sexual violence refers to rape, assault by penetration, sexual assault, or causing someone to engage in sexual activity without consent. Sexual harassment includes such things as sexual comments, sexual jokes, physical behaviour, such as deliberately brushing against someone, upskirting or online sexual harassment activity including sharing of images or video (sexting); sharing of unwanted explicit content; sexualised online bullying; unwanted sexual comments and messages; sexual exploitation; coercion and threats.

249. Harmful sexual behaviours in children are those which are inappropriate, problematic, abusive and violent. When considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered. HSB can occur online and/or face-to-face and can also occur simultaneously between the two.

250. Children can sexually abuse other children, and it doesn't only happen in secondary schools; it can take place in primary schools too. Child on child sexual violence and sexual harassment exists in many forms, from calling someone sexualised names, flicking bra straps, lifting up skirts, grabbing bottoms, breasts and genitalia to sexual assault and rape. Sexual violence and sexual harassment is not acceptable, it should never be tolerated and should never be seen as an inevitable part of growing up.

251. Further detailed information can be found: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges it contains further detailed information on:

a. what sexual violence and sexual harassment constitutes,

b. important context to be aware of, including; what is consent, power imbalances, and developmental stages,

c. harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves,

d. related legal responsibilities for schools and colleges,

e. advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment, and

f. more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

Responding to reports of sexual violence and sexual harassment

252. Tettenhall College has a **zero-tolerance approach** to sexual harassment, abuse, and harmful sexual behaviour (HSB) between children, and it will never be tolerated or accepted.

253. In line with KCSIE 2025, staff will be trained to recognise early signs of HSB, including online sexual harassment, inappropriate jokes, image sharing, or coercive behaviour.

Support pathways will include:

- Clear reporting routes for victims and witnesses.
- Referral to specialist support agencies where required.
- Signposting children to **Shore Space** (Lucy Faithfull Foundation), a confidential service offering help to young people worried about sexual thoughts or behaviours.
- Support for both victims and children causing harm, with interventions to prevent escalation.

Governors will receive annual safeguarding reports including trends in HSB and how the school is addressing them.

254. All reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and or online should be responded to. All reports should be directed to the DSL immediately.

255. The initial response to a report from a child is incredibly important. The response to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

256. Reports of sexual violence are often complex and require difficult decisions to be made. Decisions are ultimately for a school to make on a case-by-case basis, with the DSL taking a leading role, and supported by other agencies such as children's social care or the police.

257. Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves. Online sexual violence or sexual harassment can be more complex, such as images shared at another school.

258. The initial response to a disclosure is important and the victim should be taken seriously
and supported. It is important that sexual violence and sexual harassment are shown to be unacceptable and not passed off as 'banter' or 'part of growing up'. We will consider carefully any report of sexual violence or harassment and act in the best interests of the child. While the facts are being established, we will remove the alleged perpetrator from any classes shared with the victim and consider how best to keep them a reasonable distance apart, in the best interests of both children. We will also consider carefully when to inform the alleged perpetrator, and this may be discussed with relevant agencies. We will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media.

259. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

260. All reports of sexual violence or sexual harassment should be recorded on CPOMS by the DSL. This will allow regular checks to take place to look for patterns.

261. There are four likely scenarios to consider when managing a report of sexual violence or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, a course of action should be considered. Consideration should be given to whether there are wider cultural issues that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again:

a. Managing internally: in some cases of sexual harassment (such as one-off incidents) we may manage the incident internally;

b. Early help: this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;

c. Referral to children's social care: in cases where there has been harm, or there is an immediate risk, a referral should be made to children's social care; and

d. Reporting to the police: in cases where rape, assault by penetration or sexual assault is reported.

262. We will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other children in the School. We will undertake a risk assessment considering the victim, alleged perpetrator and other children at the School. Risk assessments will be kept under review. A professional risk assessment by external specialists may be required to inform our own risk assessment.

263. The DSL will work closely with the police to ensure that the School's actions do not jeopardise the police investigation. If a child is convicted or cautioned, the School will update the risk assessment and consider taking suitable action through the behaviour policy.

264. N.B. Children may take 'sides' following an incident and we will do all we can to ensure neither victim nor perpetrator are bullied or harassed. Other children in the School may also need support, especially if they have witnessed sexual violence.

Ongoing support/actions

265. Support for the victim should consider their age and developmental stage, the nature of the allegations and the risk of further abuse. The needs and wishes of the victim should be paramount, and they should be able to continue their normal routine as far as possible. The victim should never be made to feel they are the problem for making the report or made to feel ashamed for making a report. Support for the alleged perpetrator must also consider their age and the nature of the allegations. An alleged perpetrator may have unmet needs themselves. Support should also be offered to siblings following incidents (intra familial harms) if necessary.

266. Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred. Support can include:

a. Early help and children's social care

b. Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.

c. Child and adolescent mental health services (CAMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority.

d. The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.

e. NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.

f. Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.

g. Childline provides free and confidential advice for children and young people.

h. Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.

i. Childline / IWF: Remove a nude image shared online Report Remove is a free tool that allows children to report nude or sexual images and videos of 113 themselves that they think might have been shared online, to see if they can be removed from the internet.

j. LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

267. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation

needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

268. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice: Sexual violence and sexual harassment between children at schools and colleges. The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

a. This is a difficult balancing act to consider. On one hand, there is a need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

b. Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

c. Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. More information can be found in Sexual violence and sexual harassment between children at schools and colleges. The NSPCC also provides free and independent advice about HSB: NSPCC Learning - Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

d. The Lucy Faithfull Foundation has developed a HSB toolkit.

e. Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self-assessment toolkit and guidance for addressing HSB in schools.

f. StopItNow - Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

g. It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

h. School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made.

i. Stop it now - professionals looking for advice provides support for professionals in child sexual abuse prevention, so that they're well equipped to keep children safe.

269. If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Working with parents and carers

270. Schools will, in most cases, engage with the parents of both the victim and the perpetrator and should consider carefully what information they provide. It is good practice to meet the victim's parents with the victim present to discuss safeguarding arrangements, and also good practice to meet the perpetrator's parents to discuss what arrangements are being put in place, such as moving them out of classes.

271. For further information, refer to DfE's Sexual Violence and Sexual Harassment between Children in Schools and Colleges (2018). This has been updated – September 2021.

CHILDREN MISSING EDUCATION

From **1 September 2025**, schools are required to comply with the statutory guidance *Working Together to Improve School Attendance*. School recognises attendance as a safeguarding issue as absence from school may indicate neglect, exploitation, mental health challenges, or other risks to a child's welfare. Tettenhall College recognise that **attendance is a safeguarding indicator.**: The School recognises that poor attendance, persistent absence, repeated illness absence, part-time timetables, alternative provision attendance concerns and children missing education may all be indicators of safeguarding risk and will be considered by the DSL as part of the School's safeguarding arrangements. For further details on attendance, see separate Tettenhall College Attendance Policy.

272.

To meet these duties, the school will:

- Monitor attendance and punctuality daily, with the attendance officer and DSL jointly reviewing patterns of absence.
- Investigate unexplained absence on the **first day**, escalating to the DSL if safeguarding concerns arise.
- Identify pupils at risk of persistent absence and put in place targeted interventions, such as early help referrals, family support meetings, or external agency involvement.

- Work collaboratively with the Local Authority in line with statutory escalation procedures.

Governors will hold school leaders accountable for attendance data and ensure safeguarding risks linked to absence are monitored at board level.

273. Guidance was issued by the DfE in September 2016, updated in September 2025. The main changes in this guidance are:

a. All schools must notify their local authority when they are about to remove a pupil's name from the school register at a standard and non-standard transition point;

b. All schools must also notify the local authority within five days of adding a pupil's name to the admission register at a non-standard transition point;

c. Schools must monitor pupils' attendance and inform the local authority of pupils who fail to attend regularly or have missed ten consecutive school days or more without permission.

MISSING PUPIL PROCEDURES

The Aims of the Policy

274. The School wants to avoid a situation where any pupil is missing, but to react quickly if one does occur so that the safety and welfare of the pupil is maintained. All staff should know and implement the policy, which covers searching for and if necessary reporting any pupil missing from School, recording any incident, the action taken and the reasons given by the pupil for being missing.

275. It is a requirement that the child protection policy contain missing pupil procedures, since it is recognised that this is a potential indicator of abuse, neglect or exploitation. The aim is to help to identify any risk of abuse, exploitation and neglect including sexual exploitation and help prevent the risks of children going missing in the future.

Procedure

276. Tutors must complete their regular morning and afternoon registrations so that there is no possibility that an absence could remain undetected over a long period of time. Teachers should also register their class every lesson.

277. It is essential to emphasize regularly the importance of completing registration in accordance with the good practice outlined in the Staff Handbook. A list of pupils with unexplained absence (i.e. marked N) will be followed up by the Receptionist in liaison with the Headmaster and/Assistant Head (Pastoral).

278. In the event of a member of staff suspecting a pupil is unaccounted for, the following procedure must be adhered to:

a. contact a member of SLT immediately (it is the Headmaster or Assistant Head Pastoral who will normally take charge of the procedure);

b. start a log of the incident;

c. try to contact the pupil via his or her mobile telephone number (using the list kept on iSAMS);

d. contact the member staff in charge of the last activity that the pupil was known to have been involved in;

e. contact the pupils' friends;

f. the Headmaster, or the person deputising, will organise a search;

g. the Headmaster, or the person deputising, will contact the pupil's parent(s) or guardian(s), using the details on the School database (where reasonably possible, the School will hold more than one emergency contact number for each pupil); and

h. after discussion, the Headmaster, or whoever is deputising for him if he is absent from School, will contact the police on 101. The following information will need to be provided to the police:

i. Name of the pupil.

ii. Date of birth.

iii. Length of time unaccounted for.

iv. Last known location.

v. Detail of clothing worn, if known.

vi. Home address and parent/guardian contact details.

vii. Possible reason for absence.

viii. Any medical conditions.

ix. Medical information (from iSAMS) may be required and the nurse may also need to be contacted.

279. When the pupil is found, inform the Head/ Assistant Head (Pastoral), his or her parents and the police immediately. It is likely that the police will not accept telephone assurance and will visit the pupil to confirm that he or she is safe.

280. Complete the log on the incident, including the action taken and the reasons given by the pupil for going missing.

Has It Been Successful?

281. The following questions will be asked by the reviewing group to ascertain the success of the policy:

a. Is everyone aware of the procedures to be followed?

b. Have new members of staff, teaching and non-teaching, made aware of the policy?

c. Have we reviewed carefully any actual uses of the policy where pupils have been missing and the lessons that may have been learned?

PUPILS MISSING EDUCATION FOR PROLONGED PERIODS OR ON REPEAT OCCASSIONS AND / OR UNEXPLAINABLE AND/OR PERSISTENT ABSENCES FROM EDUCATION

282. Pupils who miss education particularly on repeat occasions and/or prolonged periods and / or unexplainable and / or persistent absences from education should be identified by the form tutor and reported to the DSL for further action. This can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Please see the attendance policy (points 13 and 14) for details of the procedure.

Pupils not attending school due to contractual or enrolment matters & Welfare Check Procedures

Where a pupil is not attending School due to an unresolved contractual, enrolment, fee or other parental matter, the school will continue to regard the welfare of the child as paramount. The school recognises that prolonged periods during which a pupil is not attending School, and where staff have limited or no direct contact with the child, may present a safeguarding risk. Where a pupil has not attended School for five consecutive school days due to contractual, enrolment or parental matters and has not been seen in person by School staff during that period, the Designated Safeguarding Lead (or nominated member of staff) will ensure that a welfare check is undertaken. The first initial welfare check must be undertaken by two members of staff (see Home Visits Policy below). See The initial welfare check should normally be conducted through a face-to-face visit to the pupil's home address, unless an alternative approach is agreed by the Designated Safeguarding Lead based upon the circumstances of the case and any associated risk assessment. Following the initial welfare visit, further welfare checks may be undertaken through a combination of face-to-face visits, telephone contact, video calls, Teams meetings, Zoom meetings or other appropriate methods as determined by the Designated Safeguarding Lead. A written record of all welfare checks attempts to make contact and any outcomes will be recorded on CPOMS. Where the School is unable to establish contact with the pupil or family, or where any safeguarding concerns arise during the welfare checking process, the matter will be referred to the Designated Safeguarding Lead for consideration of further action, including consultation with the Local Authority and Children Missing Education procedures where appropriate.

NON-COLLECTION OF CHILDREN POLICY FOR PREPARATORY SCHOOL

Statement of intent

283. In the event that a child is not collected by an authorised adult at the end of a session/day, the School puts into practice the agreed procedures. These ensure the child is cared for safely by an experienced and qualified practitioner who is known to the child.

Aims

284. In the event that a child is not collected by an authorised adult, the School will ensure that the child receives a high standard of care in order to cause as little distress as possible. We inform parents/carers of our procedures in the 'Parent Handbook', so that if they are unavoidably delayed, they will be reassured that their children will be properly cared for.

Method

285. Parents of children starting at the School are asked to provide specific information, which is recorded on our Pupil Information Form, including:

a. home address and telephone number - if the parents do not have a telephone, an alternative number must be given, perhaps a neighbour or close relative;

b. telephone number for place(s) of work (if applicable);

c. mobile telephone numbers(s) (if applicable);

d. names of people who are authorised by the parents to collect their child from the School, for example a child-minder or grandparent;

e. a family password for identification purposes;

f. information about any person who does not have legal access to the child; and

g. who has parental responsibility for the child

286. We agree with parents how to verify the identity of the person who is to collect their child, by explaining the use of the family password system.

287. Parents are informed that if they are not able to collect the child as planned, they must inform us by telephone so that we can begin to take back-up procedures. Parents will be reminded in this telephone call that the person collecting their child must know the family password if they are not familiar to the duty staff. A message relaying all the relevant information will be placed in the 'Child Collection' folder for the late duty staff.

288. We provide parents with our contact telephone number: 01902 751125/01902 793035.

Procedure if child remains uncollected at 6.00 pm

289. If a child is not collected at the end of the session/day, we follow the following procedures:

a. one member of staff should remain with the child at all times, reassuring the child that they are safe and every effort is being made to contact their parents/carers;

b. the other member of staff should firstly check the office phone for messages by dialling *17 and also check the collection folder for any further information relating to different arrangements for collection;

c. if this is unsuccessful, staff should try to contact the child's parents using the telephone numbers provided on the Pupil Information Sheet (File kept in the Head's Office);

d. the next step is to contact any other adults who are authorised by the parents to collect the child, and whose telephone numbers are recorded on the Pupil Information Form; and

e. all reasonable attempts must be made to contact the parents or nominated carers.

290. If contact is made with the parents and emergency arrangements for the child's collection have been made with the duty staff, the child may leave the premises with the person named by the parent over the telephone. Duty staff should make a note of the person named in the 'Collection Folder'. **Under these emergency circumstances only, it will be permissible for the person collecting not to know the family password and not be named on the Pupil Information Form.** However, duty staff will verbally check that the person collecting the child is the person named on the telephone by the parent. This is easily and politely achieved by asking: 'May I ask your name please?'

Procedure if child remains uncollected at 6.30 pm

291. If a child is not collected after 30 minutes from the end of the session/day, we follow the following procedures.

292. Duty staff contact one of the following senior team in order to make them aware that a child remains uncollected:

a.	Head of Preparatory School	Amanda Marshall Walker	TBC
b.	Assistant Head (Pastoral)	Simon Sherratt	07447893289

293. The late staff remain with the uncollected child offering reassurance and continuing to try to make contact with the child's parents/carers.

Procedure if child remains uncollected at 7.00 pm

294. If no-one collects the child after one hour and there is no-one who can be contacted to collect the child, one of the Senior Leaders (named above) will apply the procedures for uncollected children.

295. Wolverhampton Children and Families (Social Work) Team Emergency Service will be contacted on 01902 552999 after working hours and advice taken.

296. Under no circumstances are staff to go to look for the parent, nor do they take the child home with them.

Follow-Up

297. A written report of the incident should be recorded in the child's file by the duty staff.

SAFER RECRUITMENT

298. Tettenhall College has a culture of safe recruitment and adopts recruitment procedures in line with the regulatory requirements and guidance issued by the Secretary of State (Keeping Children Safe in Education and Working Together to Safeguard Children).

299. Tettenhall College is aware of the rules for employing migrant workers (February 2008; updated December 2020) and that there is a fine of up to £10 000 for engaging an illegal worker.

300. At Tettenhall College we make decisions of suitability using evidence from:

a. two references – a reference should always be obtained from the current employer. If there is no current employer, verification of the most recent period of employment and reasons for leaving should be obtained. References should be obtained from a senior person with 'appropriate authority'. References provided directly by the candidate, and electronic references, should be verified;

b. an application form which outlines their full employment history and qualifications;

c. interviews;

d. all offers of appointment are conditional until satisfactory completion of the mandatory pre-employment checks. The following are undertaken:

• verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website. Identity checks made against original official documents such as passport, driving licence, qualifications and birth certificate (copies are taken and placed on file) - photographic evidence is required plus evidence of address.

• obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). Note that when using the DBS update service you still need to obtain the original physical certificate;

• obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available or where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months

prior to that person's appointment to the organisation (detailed further in point 281 below).

• verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;

• verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then advice can be found on the GOV.UK website;

• if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate; and,

• verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

In addition:

• independent schools must check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State (See point 275 below).

• all schools must ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State by the GTCE, before its abolition in March 2012;

• before employing a person to carry out teaching work in relation to children, reasonable steps need to be taken to establish whether that person is subject to a prohibition order issued by the Secretary of State.

• appropriate checks should be carried out to ensure that individuals employed to work in reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

• as part of the shortlisting process, carrying out an online search as part of due diligence on the shortlisted candidates may be considered. This may help identify any incidents or issues that have happened, and are publicly available online, which might be explored with the applicant at interview. Shortlisted candidates should be informed of these online searches.

301. The TRA's Employer Access service can be used to make prohibition, direction, restriction, and children's barred list checks. The service is free to use and is available via the TRA's web page. Users will require a DfE Sign-in account to log onto the service.

302. To prevent unsuitable people working with children at the School we follow the legislative requirements for safer recruitment. There are four processes in place to prevent unsuitable people from working with children and young persons:

a. pre-appointment checks and the follow up of an individual's referees stated in any application;

b. Disclosure and Barring Service (DBS) checks;

c. checks for prohibition from teaching (this includes peripatetic teachers and teachers who are paid directly by the parents, but does not apply to teaching assistants who carry out their teaching work under the supervision and direction of a teacher) and prohibition from management; and

d. arrangements for reporting individuals to the DBS on the grounds of misconduct under the Vetting and Barring scheme.

303. If the DBS check is not considered sufficient to establish suitability to work in the School (because it would not cover offences committed abroad, but only those on the Police National Computer), we will obtain whatever evidence of checking is available from the person's country of origin. The NSPCC advises that this applies to individuals who have lived overseas for more than three months in the last five years. Extra references will be requested for applicants from countries which do not provide criminal record checks.

304. Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, further checks as appropriate should be made so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, schools should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

305. These checks could include, where available:

a. criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions

b. obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database.

306. In addition, we check whether individuals from countries in the European Economic Area (EEA) who will be carrying out teaching work are subject to a sanction or restriction imposed by another EEA professional regulating authority for teachers, using the NCTL Teacher Services system.

307. As to checks for prohibition from management (Section 128 direction), all Governors, all members of the Senior Leadership Team and all teachers who are subject leaders are included. Independent schools must check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State. An individual who is

subject to a section 128 direction is unable to take up a management position in an independent school as an employee; be a trustee; a governor or member of a proprietor body of an independent school; or, be a governor on any governing body in an independent school that retains or has been delegated any management responsibilities.

308. Prohibition from management checks (Section 128 direction) are required when appointing into management positions, either from outside the School or by internal promotion. This can be checked for within a DBS check if 'children's workforce independent schools' is specified in the application for the check.

309. A change in the law means that Disqualification by Association will only apply on domestic premises, not in schools. Childcare practitioners will no longer be disqualified from providing or working in non-domestic childcare settings because someone who lives or works in their household is disqualified. Schools no longer have to establish whether a member of staff providing, or employed to work in, childcare is disqualified by association and must no longer ask about the cautions or convictions of someone living or working in their household.

310. Also in any interview, at least one of the panel will be trained as a result of completing relevant on-line or face to face safer recruitment training. Any gaps in employment will be checked against references and any discrepancies taken up with the candidate. References not received in good time before interview will be chased by telephone and alternative referees approached if needed. If a reference is taken over the phone, detailed notes are taken and dated and signed.

311. No member of staff (teaching or non-teaching) should begin employment at Tettenhall College until the Headmaster is satisfied that all the statutory procedures and checks have been carried out and a record of them has been included on the Central Register. Therefore, the check list for potential employees and accompanying evidence should be submitted to the Headmaster's Office **prior** to the proposed start date. Until such time as the School has seen the applicant's original DBS certificate, appropriate measures to safeguard children must be put in place. The person in question must be informed of what these safeguards are, a note must be added to the single central register and safeguards must be reviewed every two weeks.

312. A separate barred list check must be undertaken in the event that an enhanced disclosure is not received in advance of a member of staff starting work in regulated activity, or where a 'portable' disclosure is used.

313. The School may supervise with the aim that the supervised work will not be regulated activity (when it would be if not so supervised). This will involve ongoing, regular, day-to-day supervision by a person who is in regulated activity and must be 'reasonable in all the circumstances to ensure the protection of children'. The level of supervision depends on all the circumstances of the case:

a. ages of the children;

b. number of children that the individual is working with;

c. whether or not other workers are helping to look after the children;

d. the nature of the individual's work; and

e. how vulnerable the children are.

Retention and Disposal of Sensitive Information.

314. Disclosure information is never kept on an applicant's personal file and is always kept separately and securely with access strictly controlled.

315. Disclosure information is only passed to those who are authorised to receive it in the course of their duties.

316. Disclosure information is not kept for any longer than is absolutely necessary. This is generally for a period of up to six months.

317. Once the retention period has elapsed, we ensure that any disclosure information is immediately destroyed by secure means (shredding, pulping or burning). We do not keep any photocopy.

318. We do keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested and the unique reference number of the disclosure.

Volunteers, Visitors, Contractors, Work Experience Placements and Other Adults.

319. KCSIE confirms that schools must undertake an enhanced DBS check and Children's Barred List check on all volunteers in regulated activity with children, i.e. where the volunteering is unsupervised, frequent (once a week, four times or more in a 30-day period) or overnight and provides the opportunity for contact with children.

320. The School will make a risk-assessed decision about whether to obtain an enhanced DBS check for a volunteer who is not in regulated activity and will record the risk assessment. An unchecked volunteer must not have unsupervised access to children. The School also undertakes all required checks, including enhanced DBS checks, on all governors.

321. Members of staff (teaching and non-teaching) may not invite visitors to the School without first checking with the Headmaster as to whether such a visitor requires clearance in the form of a DBS/enhanced DBS and other statutory checks. Visitors include those offering workshops, presentations, extra-curricular activities or the like whether as individuals or as employees of a company. Contractors and those carrying out repairs or servicing equipment (who do not have unsupervised access to children), and parents who attend School events, accompany staff at other specific School events or on one-off trips (not involving overnight stays) do not require an enhanced DBS check.

322. The Headmaster's Office must be informed **prior** to any supply or agency staff being engaged so that the agency can provide written notification that the statutory checks have been made. The single central register shows that these checks have been made and the supply teacher or agency worker must also report to the Headmaster's Office with photographic ID **before** commencing work. A copy of the enhanced criminal record

certificate must be obtained from the employment business before the person begins work at the School.

323. All applications for work experience must be referred to the Headmaster **before** the applicant is accepted for a placement so that the Headmaster can rule on which (if any) statutory checks must be undertaken before the placement begins.

324. Staff arranging trips/visits and Duke of Edinburgh expeditions involving overnight stays must not include any adult (over 16 years of age) within the party unless that adult is an employee of the School or has undergone the statutory checks required **prior** to the trip/visit commencing. There is also the need to gain assurance 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.

325. Staff looking to use parents, colleagues or friends to accommodate exchange or other students for an overnight stay must inform the Headmaster **well in advance** of any such arrangement. Enhanced DBS checks will be required for the adult(s) in the household who are responsible for the visiting child before the accommodation can be confirmed. Schools are free to decide whether they consider it necessary to obtain an enhanced DBS check for anyone aged 16 or over in the household where the child will be staying. Such checks can take up to 12 weeks to complete.

326. For all persons over 16 (not on the roll of the School) who live on the same premises as boarders but are not employed by the School, a criminal record certificate must be obtained from the DBS. There is no requirement to include such persons on the single central register.

327. It is a matter of judgement how far this should apply to overnight visitors or a member of staff's extended family. Staying overnight occasionally would not usually amount to 'living on the premises', but a person staying overnight every weekend during term time would need a criminal record check.

328. It is incumbent on all employees at Tettenhall College to assist the Headmaster in ensuring that our pupils are protected and that all the statutory safeguards are in place. The School has a duty to fulfil its responsibilities in this regard completely and to comply with all the regulatory requirements. This policy is designed to raise awareness amongst all the staff at Tettenhall College of the safeguards needed and thereby to secure a culture of safe practice in all matters concerning staff recruitment and visitors who come in to contact with pupils in the School. All staff must therefore adhere closely to these instructions. Wilful disregard of these regulations will lead to disciplinary action.

Roles and Responsibilities.

329. The Governing Body, Headmaster, and Designated Safeguarding Lead (Mr Simon Sherratt, Assistant Head Pastoral) are responsible for ensuring that the School follows safe recruitment processes, including:

330. ensuring that at least one person on any recruitment panel/ involved in recruitment has completed safer recruitment training

331. ensuring the upkeep of a single central register of all staff, agency and third-party supply staff, and regular volunteers in accordance with government guidance.

332. As an equal opportunities employer, we shall regularly review the operation of our recruitment, promotion, training and development policies to ensure that no applicant for employment or member of staff is disadvantaged by conditions or requirements which cannot be shown to be justifiable. For further information, refer to Policy 51 – Equal Opportunities Employer Policy.

333. If a staff member leaves the College, we are obliged to inform the DfE of the reason for leaving, e.g. retirement, for census data.

334. In terms of Prevent Duty as an employer, we also have a responsibility to report any concerns regarding our staff being drawn into extremism and/ or terrorism.

PASTORAL CARE

335. Tettenhall prides itself on being a caring community. Together we live and work in a happy and well-disciplined environment. We aim to ensure that the five outcomes of 'Every Child Matters' are achieved: being healthy; staying safe; enjoying and achieving through learning; making a positive contribution to society and achieving economic well-being. Within our community we aim to 'safeguard and promote' the welfare of each individual. Safeguarding is therefore:

> 'The process of protecting children from abuse, neglect or exploitation, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully,' DfE (previously DCSF) (2008).

336. Occasionally, individual members of the community experience difficulties with personal matters. This explains what to do if you feel concerned about something at School.

337. We can all have worries, problems and difficulties from time to time, which could be major or minor and which may affect either an individual or a group. They might cause anxiety or prompt complaint.

338. Matters can usually be dealt with by speaking to your friends, your parents, peer mentors or a member of the teaching staff with whom you feel you can talk. Your Tutor, Head of Section, Assistant Head (Pastoral), Head of Preparatory School,and Headmaster, as well as the School Nurses, are also available.

339. You may contact other people who are not on the School staff; the Independent Listener – Di Spencer, MASH at Wolverhampton Safeguarding Together Partnership (01902 555392), Ofsted (0300 123 4666), the School Medical Practice – Lower Green Surgery (01902 444550) or Childline (0800 1111).

340. Some problems are best dealt with by individual contact with one person, but others may need to be dealt with by several people. Your choice of whom to speak to will depend

on circumstances and your feelings at the time. You do not have to tell anyone else what you are doing.

341. There are many problems and situations, which may upset you. No lists can ever be appropriate for all individuals at all times, but you may not be able to manage alone in the following situations:

a. you feel you are unable to cope as a result of problems with work or for social reasons (e.g. pressure or difficulties with friendships);

b. you feel you are being discriminated against on grounds of race, religion, or for any other reason;

c. someone has hurt, abused or harassed you or has made suggestions - sexual or otherwise - that you feel are inappropriate;

d. you feel you have been treated unreasonably by a member of staff; and

e. you are being bullied or treated unkindly or unfairly by another pupil.

342. The School's pastoral system should support you through your time at Tettenhall College. Under some circumstances you may wish to make a formal complaint in writing, especially if an informal complaint has not been satisfactorily resolved. Whether you deal alone with a problem, seek advice or help in sorting it out informally or decide that a formal complaint is appropriate is a matter for you to decide.

PUPIL PROCEDURE FOR MAKING A FORMAL COMPLAINT

343. You may make a formal complaint by adopting the School's complaints procedure as set out in the Complaints Policy.

344. If at any stage you are dissatisfied with the procedure you may contact the Secretary of State or Ofsted on 0300 123 4666 or ISI on 020 7600 0100. They will come and speak to you privately at School - again you may have someone with you - and will advise you about what course seems to be the most sensible. At that stage it will be up to you to make a decision, acting on their advice.

The Secretary of State
Department for Education (DfE)
School Admissions Team
Sanctuary Buildings
Great Smith Street
SW1P 3BT

Ofsted
Piccadilly Gate
Store Street
Manchester
M1 2WD

Independent Schools Inspectorate
1st Floor, CAP House
9-12 Long Lane
EC1A 9HA

Wolverhampton Safeguarding Together Partnership
Priory Green Building
Whitburn Close
Wolverhampton
WV9 5NJ
01902 555392
WST@wolverhampton.gov.uk

HOME VISITS POLICY

345. All work with pupils and parents should, wherever possible, be undertaken in the School. However, for pupils coming into the Nursery and Pre-School, a home visit will be offered wherever possible, in order to establish a relationship between the key person and the child. There may be other occasions, in response to urgent or specific situations, where it is necessary to make one-off or regular home visits. The aim of this policy is to ensure that appropriate safety arrangements are adopted and adhered to with regards to the undertaking of home visits by staff.

346. Procedures:

a. for a first-time visit/ contact ALWAYS ensure two people are present;

b. whenever possible take two people to subsequent visits;

c. a risk assessment for home visits must be undertaken; and

d. If you are confident enough that one person can visit the home (repeat visits etc.) the following steps should be taken:

i. your line manager must know the time of the appointment (allow time to get there safely) and the time the appointment is likely to end (your estimated time due back at the School);

ii. you must ask a receptionist to make a call to you during your allotted visit time - this is to check you are feeling safe and secure; and

iii. you must then call the receptionist/ line manager once you are out of the house and the appointment is finished.

347. Any concerns during the visit must be reported back to your line manager and any future visits to this house must be discussed with your manager and appropriate precautions taken before the visit.

ALTERNATIVE PROVISION (including assurance for external providers)

346 As per KCSIE 2025, if Tettenhall College work with an external provider to seek 'alternative provision' linked to a child's education enrolled at Tettenhall College, the updated guidance clarifies that, 'the school continues to be responsible for the safeguarding of that pupil.' SAFEGUARDING Where external providers, alternative provision settings, guardians, host families, contractors or visitors are involved in the education, care or supervision of pupils, the School retains overall responsibility for safeguarding assurance. Appropriate checks, risk assessments, safeguarding assurances and escalation procedures will be undertaken and reviewed by the School.

When pupils are placed in alternative provision (AP), safeguarding is paramount. The school will follow the DfE's **Alternative Provision guidance (2025)**.

Before placement, the school will:

- Carry out due diligence checks to confirm safeguarding policies, staff vetting procedures, and supervision arrangements.
- Assess the suitability of provision for the child's educational and emotional needs.

During placement, the school will:

- Maintain weekly attendance checks and ensure the AP provider reports absence immediately.
- Keep close contact with the child, including termly welfare visits by school staff.
- Monitor progress and wellbeing, with termly reviews involving parents/carers.

Governors will receive annual reports on the use of AP, including safeguarding assurance and outcomes.

DATA PROTECTION

Safeguarding records and Data Protection

Where data protection issues relate to safeguarding records, these will be managed jointly by the DSL and the School's Data Protection Lead. Any data protection complaints relating to safeguarding information will be logged, acknowledged and responded to in accordance with the School's data protection procedures.

347. Updated guidance (Oct 2024) recommends that education professionals read the DfE Data Protection guidance for schools (DfE, 2024b). This guidance is aimed at school staff,

governors and trustees and sets out how to: comply with data protection law; develop data policies; understand what staff and pupil data to keep; and prevent personal data breaches.

CHILDREN AND THE COURTS

348. Tettenhall College DSL is aware of KCSIE 2025 guidelines involving any students involved in the court system. Re. The updated guidance now directs schools to two guides that support children in the court system, one for 5- to 11-year-olds (HM Courts and Tribunals Service, 2017a) and the other for 12- to 17-year-olds (HM Courts and Tribunals Service, 2017b). Holding and sharing information The updated guidance highlights that, as well as keeping records of concerns, discussions and decisions, designated safeguarding leads should keep record of the rationale for any decisions made.

LOOKED-AFTER CHILDREN & KINSHIP CARE

The school recognises that children in **kinship care arrangements** (living with relatives or close family friends rather than parents) face unique vulnerabilities.

KCSIE 2025 clarifies that **Virtual School Heads (VSHs)** have a non-statutory role in supporting educational outcomes for children in kinship care.

Our school will:

- Record kinship care arrangements where we are aware of them, ensuring staff know how to provide targeted support.
- Liaise with the VSH and other agencies where appropriate.
- Ensure kinship carers are included in safeguarding communications and offered family support.
- Monitor children in kinship care as a potentially vulnerable group, ensuring their needs are considered in safeguarding, wellbeing, and attainment discussions.