



MOUNT

ST MARY'S | BARLBOROUGH HALL

Safeguarding Policy

ISI Regulatory Code – 7a

Policy written by: J Murphy

Policy Date: September 2024, updated 19th May 2025

This Policy is for: Mount St Mary's College

Linked Policies: Whistleblowing Policy, Staff Induction Policy, Staff Code of Conduct, Behaviour Policy, Anti-Bullying Policy

Review date: September 2025

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SAFEGUARDING POLICY

Introduction

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

Driven by our Christian values we provide high standards of pastoral support to safeguard the welfare and wellbeing of all our pupils. In the same spirit, together with the Jesuits in Britain, we are keen to assist/support any **former pupils** still affected by past experiences in our school which were particularly traumatic/abusive. They, concerned family or friends can speak in confidence with Jack Murphy, our school Designated Safeguarding Lead. He will listen with empathy to their concerns and assist them to access appropriate support where this may be of benefit. His contact details are:

safeguardingmsm@msmcollege.com

If they prefer, Julie Ashby-Ellis, safeguarding coordinator for the Jesuits in Britain, can also be contacted directly and in confidence for such assistance. Her contact details are:

safeguarding@jesuits.org.uk

All those who come into contact with our pupils in their everyday work at this College, including those who do not have a specific role in relation to Safeguarding, have a duty to safeguard and promote the values which the tradition and ethos of the College holds dear, and to safeguard the welfare of the young people in our care. This means being supportive to children in need and safeguarding those who are at risk of harm, both on and off-line. The College seeks to create a culture of on-going vigilance in which staff feel comfortable discussing safeguarding matters that occur inside or outside of work, including matter which occur on-line.

At Mount St Mary's College we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

For the purposes of this policy safeguarding is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child abuse can happen within or outside the school environment and all staff must raise their awareness of the signs in order to protect the pupils with whom they work. An attitude that “such things cannot happen here” is unhelpful and untrue. In many cases of child abuse those who have caused harm to the child are the parents or carers but there are others who may harm children, this could include Governors, volunteers, supply teachers and agency staff. It is particularly important in the school context that all staff are aware that an alleged abuser could be another pupil, or a young person with whom the pupil has contact outside school. Teaching staff should also be aware that abuse can happen exclusively on-line. As a boarding school we must have a particular awareness of the possibility of abuse between pupils. Whether the suspected abuser is adult or another child the procedure in this policy should be equally followed.

All our students are taught about safeguarding, including online issues, as part of a broad and balanced curriculum. It is important that children are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

Children are helped to recognise when they are at risk and how to get help when they need it through the provision of information in the Student Planner, regular reflection via the Govox questionnaire and the programme of PSHEE and RSE lessons.

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

Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will 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.

The school will have no hesitation in referring abuse to outside agencies, nor in working with outside agencies to support pupils in need.

We will always act in the best interests of the child.

Where the school hosts out-of-school providers on our premises it is the responsibility of these groups to have their own safeguarding and child protection policies. However, should the school have concerns about the provider these will be referred to the local authority.

This fulfils the College’s common law duty of care towards children. We work closely with several outside agencies including Derby and Derbyshire Safeguarding Children Partnership (DDSCP), Derbyshire County Council, Derbyshire CAYA and Derbyshire Police and use the most up-to-date statutory guidance; *Keeping Children Safe in Education, 2024* and *Working Together to Safeguard Children, 2023*.

Minimising Risk

Staff Appointments

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

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

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

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

The school will follow the guidance in *KCSIE (2024)* where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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

Volunteers

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

Governors

The board of Governors facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development. They evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headmaster and DSL to account for its implementation.

In doing so they are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements. Fr Simon Ellis is the link Governor for Safeguarding.

The Governors ensure that all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.

They also ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

They further ensure that:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised and that this can occur off line and on-line

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Staff

Jack Murphy, Headmaster, is the Designated Safeguarding Lead for Mount St. Mary's College, also known internally as the Senior Leader for Safeguarding.

When he is away from school a Deputy DSL will take on the responsibility. These are Alexa Middleton, Assistant Head (Safeguarding and Wellbeing), Mrs Annette du Randt, Head of Boarding and Mrs Jodie Pettinger, our school nurse, who has also taken on the role of Mental Health Lead. The named governor for safeguarding issues is Fr Simon Ellis.

All staff receive safeguarding training on induction. The Safeguarding Leads receive formal training every two years, their skills and knowledge are regularly refreshed by updates and discussion with other professionals; all other staff receive regular training and updates to provide them with the relevant skills and knowledge to safeguard children effectively. Safer recruitment training is available to all relevant staff and governors who are involved in the recruitment process. All our staff undertake annual cyber-security training and training to understand the risks of poor filtering and monitoring, and know how to share their concerns.

All our staff have taken part in annual cybersecurity training It is the responsibility of the DSL to ensure that training happens in an appropriate and timely manner.

All up-dates will be in accordance with the advice and requirements of the DDSCP.

Any deficiency in the procedure noted by a member of staff will be remedied without delay and the policy is reviewed annually by the Board of Governors, together with the efficiency with which the related duties have been discharged. Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.' This training is regularly updated. This includes, annually, a report of any Safeguarding cases that have been referred to Social Services. The safeguarding policy is signed off by the Chair of the Board of Governors.

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

- The school safeguarding policy
- The identity and function of the Designated Safeguarding Lead and Deputies
- All staff are given a copy of *Keeping Children Safe in Education 2024 Part 1* which they must read and understand and sign to acknowledge they have done so
- The school's code of conduct for staff (including the use of social media)
- The Whistle-blowing Policy
- On-line safety

All staff are committed to the following principles of safeguarding:

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

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

Information Sharing and Confidentiality

The school is aware that The Data Protection Act 2018 and UK 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 safeguard and promote the welfare and protect the safety of children.

As stated in 'Information Sharing: advice for practitioners providing safeguarding services' (DfE, 2024) there must be a lawful basis for the school to share information, but consent is not always required as that lawful basis.

Information sharing is essential for identifying patterns of behaviour, or circumstances in a child's life that may be evidence that they are at risk of harm or are being harmed and need some form of support or protection.

This includes but is not limited to:

- child abuse, neglect or exploitation
- situations where timely supportive intervention could prevent concerns about a child's wellbeing

from escalating

- when a child is at risk of going missing or has gone missing
- when multiple children appear linked to the same risk
- where there may be multiple local authorities and agencies or organisations involved in the care of a child's care

Whistle-blowing

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

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

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

The Designated Safeguarding Lead

In accordance with *Keeping Children Safe in Education 2024*, the main responsibilities of the Designated Safeguarding Lead are:

Managing referrals

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

Raising awareness

- a) Ensure this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- b) Ensure this policy is available publicly.
- c) Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the School's role in this.
- d) Maintain links with the DDSCP to ensure staff are aware of training opportunities and the local policies on safeguarding.
- e) Where children leave the School ensure their child protection file is copied for any new school or college as soon as possible. This will be transferred separately from the main student file, ensuring secure transit and confirmation of receipt will be obtained.

- f) In accordance with the Prevent Duty Guidance for England and Wales and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) the Designated Safeguarding Lead has, in addition, the following responsibilities:
- acting as the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty
 - co-ordinating Prevent duty procedures in the School
 - liaising with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated
 - undergoing WRAP or other appropriate training
 - maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training and
 - monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty
 - regularly meet with the Head Master, Boarding Houseparents, School Nurse, Head of Learning Development and other appropriate figures to discuss the welfare of the pupils
 - be aware of pupils who have a social worker
 - help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.

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

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

The Mueller Group

The Mueller Group is a committee attended by The DSL, Deputy DSL, School Nurse and SENDco. It meets fortnightly and reviews current safeguarding concerns as well as considering trends and patterns regarding student wellbeing. The IT Engineer attends once per half term in order to look specifically at filtering, monitoring and on-line safety.

Instrumental Music Lessons

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

Physical Contact with pupils

It is recognised that there may be occasions when it is necessary for physical contact between pupil and teacher in order to demonstrate a particular technique, for example in music or sports lessons. The use of touch should never be to meet the adult's needs, but only those of the pupil. Teachers should always have first attempted other methods of instruction (e.g. demonstration, verbal instruction); an explanation should always be given in advance of physical contact and permission asked of the pupil; if the contact involves an area other than, for example, the hands or lower arm (e.g. the throat in singing lessons) then another adult should be present. Physical contact should not involve the genital areas, breast, buttocks or other areas which may be uncomfortable or embarrassing. Physical contact should not cause pain or harm to the pupil and may not be used as a punishment.

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

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

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

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

Teaching Remotely

There may be occasions when it is necessary to teach via video-conferencing or other devices to allow for remote learning including e-mail and messaging services. If this is the case then this should be done using a device approved for school use and via an agreed channel (Teams, Zoom). This should be done at agreed times (for example according to the school timetable) and every effort should be made to avoid one-to-one teaching. In the limited number of cases where one to one is necessary (for example instrumental music lessons and speaking lessons in modern foreign languages) the following conditions must be met:

- Permission sought from the DSL
- Permission received in writing from the parent
- A timetable of approved lessons to be held by the relevant Head of Department

The lesson should be recorded by the teacher and the lesson saved via the school network

Pupils

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

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

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

Children are taught to recognise when they are at risk and how to get help when they need it, for example, by speaking to the school nurse about mental or physical health concerns such as anxiety or self-harm, or by raising concerns about bullying with their form tutor.

Children are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities

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

The list includes, but is not exclusive to:

- Form Tutor
- Class teacher
- Chaplain
- Head of Year
- Houseparent
- Deputy Houseparent
- Sports Coach
- The Independent Listener
- The School Nurse

Captains who have been given positions of responsibility will also receive a briefing on safeguarding issues and the appropriate action to take should they receive any allegation of abuse or notice signs of abuse.

Vulnerable Pupils

Children and young people with special educational needs and disabilities can face additional safeguarding challenges and have an increased risk of abuse both on-line and off-line because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges
- The fact that a child or a young person may be Lesbian, Gay, Bisexual or Gender Questioning (LGBGQ) is not in itself an inherent risk factor for harm. However, children who are LGBGQ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBGQ (whether or not they are) can be just as vulnerable as children who identify as LGBGQ. Risks can be compounded where children who are LGBGQ lack a trusted adult with whom they

can be open. We endeavour to reduce the additional barriers faced by providing a safe space for them to speak to by using 'Share a Concern'.

- However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.
- When families/carers are making decisions about support for gender questioning children, they should will be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.
- As such, when supporting a gender questioning child, the school will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. We will refer to Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

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

- sharing clear information with all staff via Teams
- form tutors meeting one-to-one with their tutees

The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils. We know that *Keeping Children Safe in Education (2024)*, paragraph 21 says that we should:

'consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.'

Independent Listener

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

Dr Wendy Shaw

Children's Commissioner, Rachel de Souza

020 7783 8330.

The Safeguarding Lead and Health Staff

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

Recognising Abuse

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Abuse can happen on-line and off-line and may happen exclusively on-line. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a

result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Keeping Children Safe in Education 2024 also acknowledges the following as specific safeguarding issues:

- children missing from education
- children missing from home or care
- issues around body image
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls
- mental health
- private fostering
- preventing radicalisation (see section 3 below)
- sexting
- teenage relationship abuse
- trafficking
- 'Up-skirting'

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

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);

- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
 - Increasing secretiveness around behaviours; and
 - Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

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

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any 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. The victim may have been criminally exploited even if the activity appears consensual.

CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education or do not take part in education.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the

county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Domestic Abuse

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Since May 2024 there has been a statutory duty on all police forces in England and Wales to participate in Operation Encompass. The aim is to ensure that staff in schools are always aware of incidents of domestic abuse. The school ensures that its dedicated safeguarding e-mail is known to its partners and acts in line with DDSCP's 'Stopping Domestic Abuse Together' (SDAT) Guidance (see Appendix)

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse.

The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Female Genital Mutilation:

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

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

Risk factors for FGM include:

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

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

Indications that FGM may have already taken place may include:

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

Female Genital Mutilation reporting procedures

Keeping Children Safe in Education (2024), paragraph 42 says 'whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'.

The mandatory reporting procedures say:

'It is recommended that you make a report orally by calling 101, the single non-emergency number.'

'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

The procedures also set out what information is needed, in order to make a report.

See here: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting>

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

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

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

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

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

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

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

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

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

'Child-on-child Abuse'

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

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

violence. It is more likely that girls will be victims and boys perpetrators but all child on child abuse is unacceptable and will be taken seriously.

Child on child abuse is minimised by the education of the students in the school on their rights and responsibilities and our expectations of their behaviour. Child on child abuse is addressed explicitly in the PSHEE programme. The school is explicit in its attempts to form 'men and women for others' and the teaching of the virtues in the Jesuit Pupil Profile. The school also encourages students to share their concerns with a range of staff and allows the reporting of concerns either about themselves or others through the 'Share a Concern' link and through the monthly Govox check-in. These processes are publicised via the student planner and posters throughout the school as well as being referred to in assemblies and form times.

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

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

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

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil.
- is of a serious nature, possibly including a criminal offence.
- raises risk factors for other pupils in the school.
- indications that other pupils may have been affected by this student.
- indications that young people outside the school may be affected by this student.

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

Where child on child abuse occurs appropriate support will be given to both victim and perpetrator. This may include reference to outside agencies, one to one or peer mentoring or additional education as deemed appropriate. A risk assessment or support plan may also be put into place.

Child on child abuse will be recorded and monitored on C-Poms. It is acknowledged that even where there are no reported cases of such abuse they may still be taking place.

Sexual Violence and Sexual Harassment

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

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

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

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

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

What is consent?

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

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

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- offences under the *Voyeurism (Offences) Act of 2019* such as 'up-skirting', a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- non-consensual sharing of sexual images and videos.

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

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

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

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

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

Allegations of sexual violence or harassment will be handled according to the advice in *‘Keeping Children Safe in Education 2024*.

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

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

Important considerations in the College’s response will include:

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

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

Following any incidence of sexual violence or sexual harassment a subsequent risk assessment will include any actions required to make the location safer.

Sharing Nudes and Semi-Nudes

The latest advice for education settings is *Guidance: Sharing Nudes and Semi-nudes* by the UK Council for Internet Safety (UKCIS) published in March 2024. (UKCIS).

Sharing Nudes and Semi Nudes is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. Nudes and semi-nudes, including material created by Artificial Intelligence, can be shared online via social media, gaming platforms, chat apps, forums, or involve sharing between devices using offline services. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nudes are not always sexually or criminally motivated.

In responding to an incident as per UKCIS (2024) it is important to:

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.

Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal (see note below).

Note: In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).

If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

Do not delete the imagery or ask the young person to delete it.

Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame any young people involved.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

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

Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as 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
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness. However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use, as a school we:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via communications sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras

- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems which are reviewed regularly

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Context and Safeguarding

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

Mental Health and Safeguarding

All staff at the Mount are 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. Mental Health issues can also have an impact on attendance at school.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy, or notifying them through C-Poms.

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

All staff at Mount St Mary's College are 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.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy, using C-POMS.

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

1. Emotional Abuse

Children suffering from emotional abuse may exhibit these behavioural symptoms:

- Excessively clingy or attention-seeking behaviour
- Low self-esteem
- Apathy
- Be fearful or socially withdrawn
- Constantly seek to please
- Be over-ready to relate to anyone, even strangers

Where emotional abuse is suspected, it is important to seek help for the pupil

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

Warning signs include:

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

3. Sexual Abuse Warning

signs include:

Behaviour with sexual overtones

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

General

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

4. Physical Abuse

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

- Bruises (especially to soft areas e.g. thighs, upper arms and abdomen)
- Bites
- Scars
- Repeated fractures
- Regular shaped burns

Some marks may seem insignificant by themselves but repeated injuries even of a very minor nature may be symptomatic.

5. Child Sexual Exploitation

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

6. Female Genital Mutilation

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

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

INDICATIONS THAT FGM MAY BE ABOUT TO TAKE PLACE SOON

The age at which girls undergo FGM varies enormously according to the community. **The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy.** However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

It is believed that **FGM happens to British girls in the UK as well as overseas** (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies. There can also be clearer signs when FGM is imminent: It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.

- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.

- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- Parents seeking to withdraw their children from learning about FGM.

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

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

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

Radicalisation and the Prevent Duty

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

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

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

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible to radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

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

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

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

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

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

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

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

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- attempts to recruit others to the group/cause/ideology or communications with others that suggest identification with a group/cause/ideology
- . Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:
 - clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
 - using insulting or derogatory names or labels for another group
 - speaking about the imminence of harm from the other group and the importance of action now
 - expressing attitudes that justify offending on behalf of the group, cause or ideology
 - condoning or supporting violence or harm towards others or
 - plotting or conspiring with others

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

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

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

National Terrorism Hotline: 0800 789 321

Derbyshire Constabulary: 101

Derbyshire Prevent Team 0300 122 8694.

Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors.

At Mount St Mary's we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the headmaster without delay; any concerns about the headmaster should go to the Chair of Governors who can be contacted by e-mail as listed at the end of this policy. If the headmaster is not available the concern should be shared with the Safeguarding Lead who will notify the headmaster without delay. If a concern is raised about an adult or organisation using the school's premises for activities involving children we will follow our safeguarding procedures, including, if appropriate informing the LADO.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The headmaster has to decide whether the concern is an allegation or low-level concern. 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 for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations

It is an allegation if the person* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the headmaster should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

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

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others,

and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records will be kept confidential, held securely and comply with the Data Protection Act 2018.

Mount St Mary's College will retain such information throughout a teacher's time of employment .

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

SAFEGUARDING PROCEDURES

1. Make sure the child is not in need of immediate medical attention.
2. Report the matter immediately to the Safeguarding Lead.
3. Once a report has been received if there is any concern that a child is in need of help, or at risk, the Safeguarding Lead will, in accordance with Derbyshire Area Safeguarding Procedures, contact Children's Social Care Office by telephone immediately in order to make a referral (24 hour line 0845 6058 058).
4. If there is an allegation made against someone working or volunteering at the school then this must be reported to the Head Master or in his absence the Safeguarding Lead. The School will determine if this is a low-level concern or a matter for the Local Authority Designated Officer (LADO) within at least one working day. If necessary they will contact the LADO, Mr Miles Dent (professional.allegations@derbyshire.gov.uk; 01629 531940), within at least one working day. The school will take appropriate action to ensure the safety of the pupil and will follow all relevant HR and safeguarding procedures whilst awaiting the response of the LADO which should be received within 24 hours. (See also flow-chart in Appendix 3)
5. In the event that allegations or suspicions concern the Head Master they must be reported to the Chair of Governors without informing the Head Master. They will contact the LADO.
6. Allegations of historic abuse must be reported to the Police. If the allegation concerns the period of time **before** the establishment of the independent Trust in 2007 then the Head Master must inform the Society of Jesus in the person of the Socius, Fr Paul Nicholson SJ (socius@gbsj.org). This is to allow the Society to fulfil its obligations to the charities commission and its insurers.

If at any time there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. This will be done by the safeguarding lead. However, all staff can make referrals.

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

If a child makes an allegation of abuse:

- Reassure the child that he/she is doing the right thing and that he/she will be protected and helped.
- Clearly this is an area of great sensitivity. It would be best to seek a quiet, but not isolated spot where the child can speak freely. Whilst maintaining a sensible distance, it is often best to sit alongside rather than facing the child.
- You should not take notes whilst the disclosure is being made.
- DO NOT MAKE ANY PROMISE OF CONFIDENTIALITY – Explain that you will need to share the information with the Safeguarding Lead.
- If the child withdraws the allegations at this point you must still take further action. DO NOT IGNORE OR KEEP THE MATTER TO YOURSELF
- You should make contact with the DSL as soon as practical.
- Do not make an examination of the child.
- Do not cross-examine the child or ask leading questions.
- Do not contact the child's family but pass the matter on immediately to the Safeguarding Lead.
- In any case where there is an allegation or suspicion of abuse a written record must be made. This is not a pre-requisite to contacting the DSL but must be done as soon as is practical. These notes must reflect as precisely as possible the actual words used by the child and should not be based on an adult interpretation of this. Notes should be timed, signed and dated by the person who has made them. Ideally "contemporaneous" notes should be made – that is the record should be made within one hour of the conversation with the child. Staff must fully inform pupils that records are being kept. Any member of staff reporting a suspicion of abuse in good faith would not be liable to face disciplinary action or to suffer any adverse effect in respect of his/her own personal or professional wellbeing if, following investigation, the case is not taken further.
- Safeguarding concerns should be recorded on C-POMs. Where a member of staff is unable to access C-POMS they should complete a concern form in writing (forms are available in the staff room, from the school office and from the Head Master's office).
- Take the concern form in person to the Safeguarding Lead or in his absence the Deputy Safeguarding Lead. If this is not possible take the concern form to the Head Master's PA and ask her to contact the Safeguarding Lead.

Missing Pupils

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

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

- a) When was he/she last seen?
- b) Who was he/she with?
- c) Where might he/she have gone?

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

If the pupil cannot be found after 30 minutes parents will be informed.

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

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

If a child is not collected from school, parents will be called in the first instance. If parents cannot be contacted other contact details will be used if available. If no one can be contacted the child will be kept within the boarding houses until contact can be made.

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

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

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

Children Missing from Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school, repeatedly or for long periods, is a safeguarding concern and can be an indicator of abuse and neglect and may also raise concerns about child sexual exploitation.

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

In response to the guidance in *Keeping Children Safe in Education (2024)* the school has:

1. Staff who understand what to do when children do not attend regularly
2. We have two emergency contacts for each pupil
3. Where pupils miss school for an extended period (more than 2 days) without good reason there will be a home visit from the pastoral team.
4. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
5. Procedures to inform the local authority when we plan to take pupils off-roll when they:

- a. leave school to be home educated
- b. move away from the school's location
- c. remain medically unfit beyond compulsory school age
- d. are in custody for four months or more (and will not return to school afterwards);
or
- e. are permanently excluded

Where there is a pattern of repeated absence the school is conscious of the need to intervene early in order to prevent a child going missing in the future.

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

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

Named person for CME:

Marilyn Simcock or Deborah Botham: Children Missing Education (CME) Co-ordinator

Tel: 01629 536520 or 01629 532877

School Attendance Support:

Diane Oxborough: 01629 539320

Diane.Oxborough@derbyshire.gov.uk

SAFEGUARDING CONTACTS

• Designated Safeguarding Lead	Mr Jack Murphy
	safeguarding@msmcollege.com
• Deputy Safeguarding Lead	Mrs Alexa Middleton
	Mrs Annette du Randt, Head of Boarding
	Mrs Jodie Pettinger, School Nurse
	safeguarding@msmcollege.com
• Chair of Governors (Acting)	Mr Shaun Wyman
	governors@msmcollege.com
• Head Master	Mr Jack Murphy
	head@msmcollege.com
• Governor	Fr Simon Ellis
	governors@msmcollege.com
• Independent Listener	Dr Wendy Shaw

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

DESIGNATED SENIOR PEOPLE

BHS	Mrs Karen Keeton	Headteacher
MSM	Mr Jack Murphy	Headmaster

DEPUTY DESIGNATED SENIOR PEOPLE

BHS	Mrs Andrea Booth	Head of EYFS
BHS	Mrs Catherine Chadbourne	Second Master
MSM	Mrs Alexa Middleton	Assistant Head
MSM	Mrs Jodie Pettinger	School Nurse
MSM	Mrs Annette du Randt	Head of Boarding

DESIGNATED GOVERNOR

Fr Simon Ellis

MOUNT ST. MARY'S COLLEGE	01246 433888
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BARLBOROUGH HALL SCHOOL	01246 810511
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The contact details provided below are for use in relation to children in need of help or who are the focus of concern, this includes alleged abuse **unless by an employee/volunteer at the school in which case the LADO should be called.**

CALL DERBYSHIRE*	01629 533190
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NSPCC WHISTLE BLOWING	0800 800 5000
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DERBYSHIRE POLICE	0345 123 3333
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HEALTH	01773 599410
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DERBYSHIRE LADO	01629 531940 - professional.allegations@derbyshire.gov.uk
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National Terrorism Hotline:	0800 789 321
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CHILDREN'S COMMISSIONER, Rachel de Souza	020 7783 83300
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Derbyshire Safeguarding Children Partnership	01629 535 353
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Derbyshire Constabulary	101
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Derbyshire Prevent Team	0300 122 8694
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*Call Derbyshire is the contact number for Derbyshire County Council. Their staff will direct you to the appropriate department. This is the number to call if you wish to make a social services referral, but can be used to access any service.

Approved by Chair of Governors 19.5.25



S Whyman