



Marymount

INTERNATIONAL SCHOOL LONDON

SAFEGUARDING POLICY

This policy is made available to parents/ guardians of all girls, day and boarding, on the School website, in the Student/Parent Handbook and on request from the School Office. It is available to the Staff at the School from the School website, in the Staff Handbook and on request from the School Office. Content of this policy is directly discussed with new staff upon induction into the School.

Important Information

Designated Safeguarding Lead:

Ms Annah Langan (Deputy Head Pastoral): langana@marymountlondon.com

020 8949 0571 x202 or 07557 271546

Deputy Designated Safeguarding Officers:

Mrs Jerri Donnelly (Chair of Pastoral Life): donnelyg@marymountlondon.com

0208 949 0571 x299

Ms Paula Horton (Head of Boarding): boardinghead@marymountlondon.com

0208 949 0571 x268/242

The telephone numbers of the Royal Borough of Kingston Learning and Children's Services are as follows:

Safeguarding Team (SPA): 0208 547 5008 (For safeguarding concerns about students)

Local Authority Designated Officer (LADO): lado@richmond.gov.uk or 0208 831 6008 (For allegations against staff contact SPA who can also refer you to the LADO)

Out of Hours Services: 0208 770 5000

Kingston Prevent: 0208 340 7264

Police (emergency): 999 **(Non-emergency):** 101

For concerns regarding radicalization: counter-extremism@education.gsi.gov.uk

The NSPCC/Home Office Child Abuse Whistleblowing Helpline: 0800 028 0285 or help@nspcc.org.uk

Designated Nurse for Safeguarding Children for Kingston: Andrea Knock - 0208 274 7803 or email: andrea.knock@kingstonccg.nhs.uk or secure email: andrea.knock@nhs.net.

The following telephone numbers may be useful for students:

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| Learning and Children's Services Safeguarding Team | 0208 547 6587 |
| Childline | 0800 1111 |
| NSPCC | 08000 028 0285 |
| OFSTED Helpline | 0300 123 1231 |
| | 0845 540 4040/4045 |
| Independent Listener: Mrs Ursula Seiler | 07974 087317 |
| Children's Commissioner | 0800 528 0731 and email: http://www.childrenscommissioner.gov.uk/ |

Marymount Safeguarding Policy Statement

This policy has been authorised by the Governors, is addressed to all members of staff and volunteers, and is available to parents on request. It applies wherever staff, temporary staff or volunteers are working with students even where this is away from the School; for example, at an activity centre or on an educational visit. Wherever the word “staff” is used in this document, it covers ALL persons working within the school including employed staff, Governors, supply and self-employed staff, contractors and volunteers, students or those on work experience. The Board of Governors takes seriously its responsibility to safeguard and promote the welfare of students; and to work together with other agencies to ensure adequate arrangements within our School to identify, assess, and support those students who are suffering harm.

The School’s Safeguarding Policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, the Education and Inspections Act 2006, the Education Act 2011, and the Equality Act 2010.

In producing this policy regard has been paid to:

Keeping Children Safe in Education (September 2018) (KCSIE)

Working Together to Safeguard Children (July 2018) (WT)

Sexual Violence and Sexual Harassment between Children in Schools and Colleges (May 2018)

‘Preventing and Tackling Bullying’ (2017)

Disqualification under the childcare Act (June 2016)

What to do if you’re worried a child is being abused (March 2015)

Information Sharing (March 2015)

Prevent Duty Guidance: for England and Wales (July 2015) (Prevent)

The Prevent Duty: Departmental advice for Schools and childminders (June 2015)

The use of social media for on-line radicalization (July 2015)

Mental Health and Behaviour in Schools’ (March 2015)

Counselling in Schools: a blueprint for the future (March 2015)

and is in accordance with locally agreed inter-agency procedures set out by Kingston Local Safeguarding Children’s Board (LSCB). **Kingston procedures and contact details are contained within their website: <http://kingstonandrichmondlsqb.org.uk/>**. This policy is reviewed by the Senior Leadership Team and the Governors at least annually.

Marymount International School is committed to safeguarding and promoting the welfare of each student under its care and expects all staff and volunteers to share this commitment and understand that the student's welfare/well-being is our paramount concern. Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment. The School should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of each individual student.

All members of the Board of Governors receive training in safeguarding and ensure that the guidance is followed by the School. At all times the Governing Body and the School will consider the best interests of the student and will have a student-centered and coordinated approach to safeguarding.

The School ensures that all contact details for agency involvement are displayed prominently, including those for support and advice about extremism. All members of the School are required to read and understand the safeguarding policy, Part 1 of KCSIE and Annex A of KCSIE (September 2018) and to read and abide by the Staff Code of Conduct, and to report instances of actual or suspected child abuse or neglect or radicalisation to the Designated Safeguarding Leads. In exceptional circumstances staff may report directly to children's social care; however, staff are expected to raise concerns with the Schools' Designated Safeguarding Lead in the first instance. In the case of Female Genital Mutilation (FGM), teachers recognise that they must report to the police cases where they discover that an act of FGM appears to have been carried out. In addition, all staff are familiar with the *Prevent Duty Guidance for England and Wales (July 2015)*.

Safeguarding is everyone's responsibility and everyone has a role to play in identifying concerns, sharing information and taking prompt action.

The School recognises that safeguarding incidents could happen anywhere and all staff should be alert to possible concerns being raised in this School. The School will take all reasonable measures to ensure:

- That a Safeguarding Policy and appropriate procedures are in place.
- The School's safeguarding policies are up to date, risks are assessed at regular intervals and any areas requiring action are dealt with immediately.
- Arrangements have regard to the *National Minimum Standards for Boarding Schools (April 2015)*
- Safe recruitment is practised in checking the suitability of staff and volunteers (including staff employed by another organisation), and other staff or supply staff which must be completed to work with children and young people in accordance with the principles established by the Children's Act (1989 & 2004), the Education Act (2002) and in line with government publications: *Working Together to Safeguard Children* (July 2018), and holds an up to date single central register of staff, ensuring the school meets statutory requirements and advice. (See Recruitment, Selection and Disclosure Policy and Procedure Policy)
- That all necessary checks on the suitability of people who serve on the School's governing body in accordance with regulations and guidance as above¹ are carried out;
- That where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to

¹ Guidance regarding CRB/DBS checks recently updated by the Protection of Freedoms Act 2012

- work with children, a prompt and detailed report is made to the Disclosure and Barring Service (DBS) and to the Teaching Regulation Agency (TRA);
- That the local inter-agency procedures of the Royal Borough of Kingston, Local Safeguarding Children Board are followed;
 - That each student is protected from all forms of abuse, whether from an adult or another student; we are alert to possible signs of abuse both in the School and from outside;
 - That every suspicion or complaint of abuse is dealt with appropriately;
 - That procedures that promote this policy are designed and operated;
 - Procedures are designed and operated which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
 - Students who have been abused are supported in accordance with their agreed Child Protection Plan;
 - That staff are alert to the medical needs of students with medical conditions;
 - Safeguarding students who have suffered or are likely to suffer significant harm are differentiated from those who are in need of additional support from one or more agencies. The former are reported to Children's Social Care and the latter are referred to Early Help Assessment (EHA) and Team around the Child (TAC);
 - That students are taught about Safeguarding in the following ways:
 - The Student Leaders are given safeguarding training by the DSL in the first half-term of the school year.
 - Through the PSHEE curriculum, students focus on how to develop healthy relationships and friendships. They are advised how to stay safe online and also to consider bullying and how to prevent it and also report it.
 - Emphasis is given to consider behaviour positively through Kindness Week.
 - Students are reminded of how to stay safe online and also in school and in their personal lives through the Advisory system.
 - External speakers are invited to the school on an annual basis to teach online safety to students. Workshops are also given to staff and parents.
 - Students are reminded of safeguarding issues in assemblies throughout the year. Reminders include: how to stay safe online; how to balance online activity with mental well-being; identifying key staff students can turn to if they are experiencing a problem; anti-bullying through Kindness Week; personal security should there be a crisis.
 - Boarders are advised how to stay safe during their boarding induction with emphasis given to staying safe when off campus and communicating back to school in case of emergency.
 - Staff follow requirements of the Code of Conduct;
 - Robust and sensible Health & Safety procedures are operated;
 - All practicable steps are taken to ensure that School premises are as secure as circumstances permit;
 - That clear and supportive policies on drugs, alcohol and substance misuse are operated;
 - Procedures are considered and developed to deal with any other safeguarding issues which may be specific to individual children in our School and working with agencies such as Child and Adolescent Mental Health Services (CAMHS) and Interpol. Every complaint or suspicion of abuse from within or outside the School will in all circumstances be referred to an external agency such as the Royal Borough of Kingston Learning & Children's Services (KLCS), the Child Protection Unit (CPU) of the police or the National Society for the Prevention of Cruelty to Children NSPCC. In cases of allegations against staff, the matter will be referred to the Local Authority Designated Officer (LADO), Royal Borough of Kingston, within 24 hours.

- The Safeguarding Governor meets with the DSLs, at least annually and conducts an annual review of the implementation of safeguarding policies and procedures, reporting findings back to the Governing Body. The DSL provides a report for Governors for each Board meeting summarising safeguarding issues for that period.

Role of Designated Safeguarding Lead and Deputies

The Designated Safeguarding Lead

The School has appointed a senior member of staff on the Senior Leadership Team with the necessary status and authority (Designated Safeguarding Lead) to be responsible for matters relating to child protection and welfare.

The main responsibilities of the Designated Safeguarding Lead are:

- To take lead responsibility for safeguarding and child protection including online safety
- To be the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection;
- To refer cases of suspected abuse to the Kingston LSCB and other agencies as required and support staff who also make referrals to the Kingston LSCB;
- To refer cases to the Channel Programme where there is a radicalization concern as required and support staff who make such referrals;
- To refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required;
- To refer cases where a crime has been committed to the Police as required;
- To liaise and support staff on matters of safety and safeguarding and co-ordinate the safeguarding and child protection procedures in the School;
- To maintain an on-going and regular training programme including online safety and regular updates at least annually for all school employees, which ensures that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example, in one-to-one tuition, sports coaching, conveying a student by car, engaging in inappropriate electronic communication with a student, and so on)².

Record Keeping and Sharing Information

The DSL will:

- keep detailed, timely, accurate and secure written records of concerns and referrals in relation to child protection separate from student records, until the student's 25th birthday. These should be copied on to the child's next school as soon as possible. This is transferred separately from the main student file and is sent securely. Confirmation of receipt is obtained to ensure safe delivery of the file. The DSL may also consider it appropriate to share information with the new school or college in advance of that student leaving to ensure continued support when that child arrives at their new school. An indication of the existence of the additional file is marked on student files.
- liaise with the Designated Person responsible for Child Protection appointed by the LADO (Local Authority Designated Officer) and any "case manager" in cases which concern a staff member;

² *Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings* is also available on the DfE website

- keep the Headmistress informed of all actions unless the Headmistress is the subject of a complaint. In this situation, the Designated Person should consult with Ms Noreen Doyle, Chair of Governors;
- advise and act upon all suspicion, belief and evidence of abuse reported to her;
- liaise with the KLCSB and other agencies on behalf of the School;
- ensure that any student currently with a child protection plan who is absent from school without explanation for two days is referred to her Social Care Team;

If the Designated Safeguarding Lead is unavailable or is herself the subject of a complaint, her duties will be carried out by the Deputy Safeguarding Leads, who have received appropriate training which is updated every two years. This will include inter-agency working protocols and training in the LSCB's approach to *Prevent* duties.

The Designated Person and her Deputies have undertaken Child Protection Training and training in inter-agency working and will attend refresher training biennially.

The Headmistress ensures that there are sufficient resources, time, funding, and support allocated to allow the Designated Person to fulfil her child welfare and safeguarding responsibilities effectively.

Duty of Employees, Governors and Volunteers

Every employee and Governor of the School as well as every volunteer who assists the School is under a general legal duty:

- to protect children from abuse;
- to read and understand Part 1 of KCSIE (September 2018)
- to be aware of the School's safeguarding procedures and to follow them;
- to know how to access and implement the procedures, independently if necessary;
- to keep a sufficient record of any significant complaint, conversation or event;
- to be aware of the role of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads;
- to report any matters of concern to the Designated Safeguarding Lead. All adults working in this School (including visiting staff, volunteers and students on In exceptional circumstances staff may report directly to children's social care however staff are expected to raise concerns with the schools' Designated Safeguarding Lead in the first instance.
- to know and understand the Staff Code of Conduct;
- to be aware of the Missing Persons Procedure;
- to be aware of the student Behaviour, Rewards and Sanctions Policy.

Signs of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult(s) or by another

child or children, which may be known as ‘peer on peer’ abuse.

Forms of abuse are:

1. **Physical 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.
2. **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 from 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.
3. **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 and 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
4. **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, for example, 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.

It is important that the whole Marymount community understand and are aware of the many different aspects related to Safeguarding. Specific forms of safeguarding issues are defined in *Keeping Children Safe in Education, Annex A* (Sept 2018) and include knowledge of the following to ensure our students’ safety:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation (CSE) as also defined in *Child Sexual Exploitation* (Feb 2017)

- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So called ‘honour-based’ violence
- Female genital mutilation (FGM)
- Forced marriage
- Preventing radicalisation
- Peer on peer abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Bullying
- Drugs
- fabricated or induced illness
- Faith based abuse
- Violence: Gangs and youth violence; Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering

Abuse by one or more students against another student (peer on peer abuse)

Peer abuse is not tolerated and will be thoroughly investigated. It can include bullying, (including cyberbullying), physical abuse, sexual violence and harassment, sexting and initiation/hazing type violence and rituals.

The DfE May 2018 report entitled, [‘Sexual violence and sexual harassment between children in schools and colleges’](#) includes advice about what is meant by sexual violence and sexual harassment and advice on a whole school approach to preventing this. (Further information can be accessed through the above hyperlink.)

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.

Students who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. 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 and will not be tolerated. It is important that **all** victims are taken seriously and offered appropriate support. The perpetrator will also be offered support throughout the investigation.

Victims and perpetrators of peer-on-peer abuse will be fully supported through the pastoral care system and by the Designated Safeguarding Lead and relevant Advisor. The Life Coach/Counsellor may also be involved as an additional support.

In the event that:

- The allegation or event is one of actual bodily harm – i.e. an injury has necessitated first aid or medical treatment.
- The allegation has been reported to the Police or Children’s Services by the student or parent.
- The student is looked after in public care.
- The student is the subject of a Child Protection Plan.

- The student has a disability or Statement of Special Educational Needs.
- The student concerned has been subject to previous complaints.
- The allegation is one of sexual abuse, sexual violence, sexual harassment

The parents of the victim and the perpetrators(s) will immediately be informed, by the DSL or the Head, of the action or allegation if the child is not deemed to be at risk upon this disclosure to parents.

Advice will be sought from the Kingston SPA (or appropriate social worker if allocated) with a view to a Strategy Meeting or Discussion being held within 24 hours. This process will ensure there is an agreed appropriate course of action and the time-scale for investigations.

In considering whether or not a referral to Children's Services is appropriate, the Headmistress may seek advice from the either of the Chair of Governors and the LA's Lead Officer and advisers. Parents should also be advised of their independent right to make a formal complaint to the Police.

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

Peer abuse will not be passed off as 'banter' or 'part of growing up'.

Consideration is given to the fact that students with SEN/D may be more vulnerable to bullying.

Allegations of any form of bullying or peer abuse involving mobile phones and/or social media including sexting will be thoroughly investigated and dealt with in line with the anti-bullying and behaviour policies, and the DSL will seek the advice of and liaise with relevant agencies.

The Anti-Bullying Policy and procedures are available as a separate policy on the school website or on request from the School Office.

Possible signs of abuse include (but are not limited to):

- the student says she has been abused or asks a question which gives rise to that inference;
- there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour;
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- the student's development is delayed;
- the student loses or gains weight;
- the student appears neglected, e.g. dirty, hungry, inadequately clothed;
- the student has difficulties integrating in the school community;
- the student display signs of over-sexualisation
- the student is in possession of pornographic material
- the student is reluctant to go home, or has been openly rejected by her parents or carers.

Training

Whole-School in-service training on safeguarding issues, including the Prevent Duty, will be undertaken annually, in line with advice from the LSCB. Staff will receive training on how to recognise signs of abuse including peer on peer sexual violence or sexual harassment. All staff are expected to attend relevant training. Informal updates are given by the DSLs either by email or in minuted Staff Briefings as required, for instance by changes in regulations or best practice, and at least annually. All staff are trained in online safety through the School CPD and PSHEE Programme.

- All staff read Part One of KCSIE (2018) and Annex A. This applies not only to new staff but also to those already in post in April 2014 when KCSIE was first introduced. Special provision is available to staff who struggle with English and literacy.
- The DSL receives updated Child Protection Training at least every two years. This will include local inter-agency working protocols and training in the Kingston LSCB's approach to *Prevent* duties.
- The DSL will also refresh their knowledge and skills by keeping abreast of latest safeguarding news/developments.
- All new staff, including temporary staff and volunteers, are provided with Induction Training that includes:
 1. The School's Safeguarding policy;
 2. The Staff Code of Conduct/Behaviour Policy including Whistleblowing Policy
 3. The Behaviour, Rewards and Sanctions Policy
 4. Missing Persons Procedure
 5. The identity and role of the Designated Safeguarding Lead and Deputies
 6. A copy of Part 1 of KCSIE (2018) and Annex A.

Additional one-to-one training from the DSLs or their deputies will be given if necessary to ensure full understanding of these. New staff will be made aware of the identity and role of the DSL and deputy DSLs, the Whistleblowing Policy, and the Acceptable Use of Technologies Policy, and be given copies of the relevant documents.

DSLs will be expected to attend appropriate network meetings and to participate in the multi-agency training programme organized by the Kingston Safeguarding Children's Board.

All staff as part of their Induction will be required to read and understand the policies listed above. Staff must sign a confirmation form to state that they have read and understood these policies. Existing staff are updated appropriately. They must also read the anti-bullying policy. A register of training undertaken will be kept by the HR Officer.

Procedures

Staff are given training in order to know how to deal with a safeguarding disclosure made by staff or student. They are also given training to know how to deal with an incident that includes sexual harassment or violence.

Initial complaint: A member of staff suspecting or hearing a complaint of abuse must take **immediate** action. They should recognize that a student is likely to disclose to someone they trust and should be supportive and respectful. They must:

- listen carefully to the student and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place;
- not ask leading questions, that is, a question which suggests its own answer and only prompting the student where necessary with open questions – where, when, what, etc.
- reassure the student but not give a guarantee of absolute confidentiality. The member of staff should explain that s/he needs to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken. It is important that the victim understands what the next steps will be and who the report will be passed to;
- keep a brief but sufficient written record of the conversation. Wait until the end of the report and immediately write up a thorough summary. This will allow the staff member to devote their full attention to the child and listen to what they are saying. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The written report should only record facts as the child has presented them and not the personal judgements of the note taker. The record should be signed by the person making it and should use names, not initials. They should not make copies of the record. The record must be kept securely and handed to the Designated Safeguarding Lead.
- The School should not do anything that may jeopardise a police investigation, such as asking a student a leading question or attempting to investigate the allegations of abuse.
- Where the report includes an online element, staff should not view or forward illegal images of a student. The advice as found in ‘Searching, Screening and Confiscation’ and UKCCIS sexting advice provides more detail on what to do in this instance.
- The School will follow the flow chart of actions where there are concerns about a student to be found in KCSIE (September 2018). The DSL and other staff may be required to support other agencies and professionals following a referral. If information is not forthcoming after a referral the DSL or the member of staff who made the referral should follow this up with the agency to whom the referral was made. Where a referral is found to require action, this will include early help and inter-agency assessment including and Early Help Assessment (EHA) and Team Around the Child (TAC) approaches. If a student is suffering or is likely to suffer from harm, a referral to the LCSB (and police if appropriate) will be made immediately. If after a referral there is no improvement in the situation the DSL (or the person who made the referral) should press for re-consideration to ensure the student’s situation improves.
- All staff should be prepared to identify students who may benefit from early help, and should discuss early help requirements with the DSL. The advice from DFE entitled ‘What to do if you are worried a child is being abused’ and the NSPCC website provide more advice and information.
- The DSL must also be aware and apply a contextual approach to safeguarding. Incidents and/or behaviours can be associated with factors outside the School and/or can occur between students outside the School. All staff, but especially the Designated Safeguarding Lead (or deputy) should consider the context within which such incidents and/or behaviours occur. Assessments of students should consider whether wider environmental factors are present in a student’s life that are a threat to their safety and/or welfare. Providing as much information at the time of referral will allow any assessment to consider all the available evidence and the full context of any abuse.

When there has been a report of sexual violence, the DSL or Deputy will make an immediate risk and needs assessment. When there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk assessment will consider:

- The victim (their protection and support), their wishes in terms of how they want to proceed
- The alleged perpetrator (and their support)
- All the other students (and adult students and staff) and actions to protect them.
- The nature of the alleged incident (s)
- The ages of the students involved and their developmental stages
- Any power imbalance between the students (e.g. Age, maturity, confidence, disability)
- Is the incident a one-off or a pattern of abuse
- Are there ongoing risks?

Risk assessments will be recorded and kept under review to ensure that measures are put in place to protect students and keep them safe.

Whilst the incident is being investigated, the School will consider how best to keep the 'victim' and 'perpetrator' a reasonable distance apart whilst at school or taking transport to and from school, where appropriate. These actions will be in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator.

Every report will be managed on a case-by-case basis. The school will consider the four following options when managing reports of sexual violence and/or sexual harassment:

1. Manage the report internally
2. The children involved may benefit from an EHA (Early Help Assessment)
3. Referring the incident to Kingston LSCB
4. Report the incident to the Police and Kingston LSCB.

The DSL will work with Kingston LSCB and specialist services as required.

At Marymount International School, we ensure that any form of abuse or harmful behavior is dealt with immediately and consistently to reduce the extent of harm to the student, with full consideration to the impact on that student's emotional and mental health and well-being.

Preserving evidence: All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved not fewer than six years and at least until the student has reached the age of 25.

Allegations against staff: The School follows the guidance in *Keeping Children Safe in Education* (Sept. 2018) along with *Working Together to Safeguard Children* (July 2018). Suspension will not be an automatic response to an allegation. Full disclosure will be made to the LADO within 24 hours to advise on the course of action. Allegations against staff, volunteers and the Designated Safeguarding Lead should be reported to the Headmistress and LADO within 24 hours. If the Headmistress is absent, the allegation should be passed on to the Chair of Governors. If an allegation concerns the Headmistress, the person receiving the allegation should immediately inform the Chair of Governors without notifying the Headmistress first. In cases of serious harm, the police should be informed from the outset. The reporting staff member is provided with immunity from retribution or disciplinary action for 'whistleblowing' in good faith [see *Whistleblowing Policy and Procedures* in Staff Handbook]. If a member of boarding staff is suspended in light of a child protection allegations, arrangements will be made for alternative accommodation away from children.

The School will report to the Disclosure and Barring Service (DBS) and to the Teaching

Regulation Agency (TRA) within one month of leaving the School any person in regulated activity (whether employed, contracted, a volunteer or student) whose services are no longer used because s/he is considered unsuitable to work with children; the DBS address for referrals is PO Box 181, Darlington DL1 9FA. The School also has a legal duty to respond to requests from the DBS and TRA for information already held about any person (whether employed, contracted, a volunteer or student).

Allegations against students: A student or students against whom an allegation of abuse has been made may be suspended from the School during the investigation, and the School's policy on Behaviour, Reward and Sanctions together with the Anti-bullying and Acceptable Use of Technology policies will apply. If the School determines that the latter have been violated in either the real or virtual world, the violator will be subject to appropriate disciplinary action, which may include referral to appropriate counselling, temporary or permanent exclusion. All students involved, whether perpetrator or victim, are treated as being "at risk". The School recognises that false accusations of harassment and/or bullying can cause serious harm to innocent persons. If an allegation results in a finding that the complainant knowingly and falsely accused another person of harassment and/or bullying, the complainant will be subject to disciplinary action, up to and including permanent exclusion.

Action by the Designated Person should take account of the following:

- the obligation to work with the Royal Borough of Kingston Safeguarding Children Board (KLSCB) including the need to take advice from the LADO or KLSCB within 24 hours. If a referral is necessary and has been made by telephone in the first instance, the Designated Person will follow up in writing to the LADO or KSCB within 24 hours. If no response or acknowledgment is received within three working days, the Designated Person will contact KLSCB again.
- the wishes of the student who has complained, provided that the student is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is such that decisions may need to be taken, after all appropriate consultation, that override a student's wishes.
- the wishes of the complainant's parents, provided they have no interest which is in conflict with the student's best interests and that they are properly informed.

Senior students given positions of responsibility over other students are briefed on appropriate action to take should they receive any allegations of abuse.

Missing Persons: there is a Missing Persons Procedure, known to staff and used in practice, for searching for and, if necessary reporting, any boarder or day student missing from school (and recording any incident, the action taken and the reasons given by the student for being missing).

The Designated Safeguarding Lead will monitor the operation of this policy and its procedures and make a report to the Headmistress before every Board of Governors' meeting. Monitoring will take place three times a year. The SCR is monitored by the Chair of the Board tri-annually. The CP log is reviewed to detail the number of cases involving students and staff that have been addressed by the Designated Safeguarding Lead and Deputies and a report on this is submitted by the Headmistress to the Board Chair tri-annually.

Governors undertake an annual review of Safeguarding Procedures and of this

policy at the November Board meeting, and how their duties under it have been discharged. They also consider how the students are safeguarded via the curriculum. The Chair of Governors responsible for Safeguarding is Ms Noreen Doyle.

Other Policies and Procedures related to Safeguarding:

(Policies and procedures not on the website can be found in the Student/Parent and Staff Handbooks)

Acceptable Use Policy (Staff and Student)
Admissions Policy
Anti-Bullying Policy
Attendance Procedure
Complaints Procedure
Drugs Policy
Health and Safety Policy
Missing Persons Procedure
Policy on Use of Reasonable Force
PSHEE Curriculum
Recruitment, Selection and Disclosure Policy and Procedure
SENDA Policy
Short Term Hosting Guidance
Staff Code of Conduct
Whistleblowing Policy for Staff
Whistleblowing Policy for Students

Approved: November 2017

Amended: September 2018

To be reviewed: November 2018