



St. Michael's School

Safeguarding and child protection policy

For the purpose of this policy 'the School' refers to the St. Michael's School, Llanelli and all buildings and land that it occupies.

This policy should be read in conjunction with the *Curriculum Policy, Countering Bullying & Cyber Bullying Policy, eSafety Policy, Prevent Policy, Whistleblowing Policy, Safer Recruitment Policy, Staff Code of Conduct* and *Physical Restraint Policies*.

1. INTRODUCTION

The school accepts that it is the responsibility of every adult to protect children from abuse. All children have a right to be protected from all forms of abuse and discrimination and to be treated equally regardless of age, gender, racial origin, culture, religious belief, language, disability or sexual identity.

There are three main aspects of this policy:

- a. prevention of abuse through our teaching and the pastoral support which is offered to pupils;
- b. procedures for identifying and reporting cases, or suspected cases, of abuse. (Teaching and non-teaching staff and school prefects are well placed to observe signs of abuse because they are working closely with pupils); and
- c. support to pupils who may have been abused.

This policy applies to all staff and volunteers at St. Michael's School: both teaching and support staff. It also applies to the governing body and proprietor. It will be reviewed at least once annually, and additionally updated periodically in light of lessons learned or changes in government policy.

Sixth Formers and boarders are specifically educated as to their safeguarding responsibilities. This includes any students aged 18 or over at the point of admission, although such admissions are very rare. Anyone in these groups may be the first point of disclosure for a pupil and the School wants all staff, students and volunteers to follow correct procedures for dealing with a case, or suspected case, of abuse.

The school understands its statutory duty under section 157 of the Education Act 2002 and Children's Act 2004 to safeguard and promote the welfare of children as described in section 175 of the Education Act 2002 and that we must give due regard to Welsh Government statutory guidance *Keeping Learners Safe* as the safety and protection of children is of paramount importance to everyone at St. Michael's School.

The guidance and procedures within this document take into account the *Safeguarding Children: working Together Under the Children Act 2004, The Children and Young People's*

Plan (Wales) Regulations - September 2007, Shared Planning for Better Outcomes- September 2007, The Framework for Assessing Children in Need and their Families – 2001. In 'Keeping Learners Safe', Welsh Government defines safeguarding and promoting the welfare of children as:

“Protecting children from abuse and neglect, preventing impairment of their health or development and ensuring that they receive safe and effective care to enable them to have optimum life chances”

2. SAFEGUARDING TEAM CONTACTS

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The safeguarding governor is Craig Wilson (Managing Director Schools, CATS Global Schools), and he is the school board's recipient of the annual safeguarding report from the DSL team:

crwilson@catsglobalschools.com

The Chair of Governors may be contacted at:

chairofgovernors@catsglobalschools.com

3. ROLES AND RESPONSIBILITIES

THE ROLE OF THE LOCAL AUTHORITY

The Local Authority has responsibilities at three levels: strategic, support and operational.

On a **strategic** level Carmarthenshire County council will plan, co-ordinate services and allocate resources working in partnership with other agencies.

At this level, the council will:

- Work with other agencies to put in place and support effective partnership working
- including cross border processes;
- Allocate resources to enable educational settings and local authority staff can discharge their responsibilities for safeguarding children satisfactorily;
- Liaise with the appropriate diocesan authorities in respect of arrangements for safeguarding children in aided schools in Carmarthenshire;
- Monitor the compliance of maintained schools using the guidance listed in Section 2 Legislative Framework above;
- Bring any deficiencies to the attention of the governing body of the school/setting and give advice as to how to remedy deficiency;
- Take action to resolve any inter-agency problems;
- Play a full part in case reviews in accordance with Chapter 10 of the Safeguarding Children: Working Together Under the Children Act 2004;
- Disseminate information about relevant findings from case reviews to designated staff for child protection in the authority and maintained schools;
- Allocate resources to support the work of the Safeguarding Children Board;
- Ensure that a senior officer represents the authority on the Safeguarding Children Board;
- Through the work of the Safeguarding and Quality Assurance Unit ensure that all internal and external educational providers fulfil their responsibilities in safeguarding children.

On a **support** level Carmarthenshire County Council will endeavour to ensure that the governing body of all schools and further education institutions, the Head Teacher or Principal and proprietors of independent schools and other partnership agencies providing services for children and families:

- Are aware of their responsibilities for Child Protection
- Are aware of their responsibilities to Looked After Children in Carmarthenshire;
- Have appropriate guidance and support available from the Carmarthenshire Children's Services Safeguarding Unit/Team, facilitated by the Designated Education Safeguarding Officer;
- Have access to a programme of appropriate training;
- Have a Model Child Protection Policy for schools to review;
- Have flowcharts and procedures to follow in line with the All Wales Child Protection Procedures 2008.

On an **operational** level Carmarthenshire County Council will be responsible for promoting the safety and welfare of children in the following circumstances:

- Children excluded from school, or who have not obtained a school place (for example children in Pupil Referral Units);
- Children with complex medical needs and specific or additional learning needs;
- home educated children;
- Children subject to Child Protection Plans;

- Looked After Children; and
- Children who are educated outside of Carmarthenshire.

The Carmarthenshire Lead Officer for Safeguarding in Education can be contacted at:-
Phone- 01554 742322

Carmarthenshire Children's Services can be contacted as follows:-
Phone: 01554 742322

THE ROLE OF THE GOVERNING BODIES

Governing bodies in Carmarthenshire have a responsibility to ensure that:

- The school has an effective Child Protection/Safeguarding policy in place;
- The policy is reviewed annually and is made available to parents and/or pupils on request;
- The school follows recommended procedures and guidelines for dealing with allegations of misconduct against members of staff, including child protection allegations, in line with CCC procedures and WG guidelines;
- The school operates safe recruitment procedures and ensures that all appropriate checks are carried out on all new staff and volunteers including governors in line with AWCPP 2008 (All Wales Child Protection Procedures 2008); Keeping Learners Safe (2021) and WG guidelines;
- The school has designated senior members of staff who are appropriately trained to take lead responsibility for dealing with child protection;
- The Head and all staff and volunteers (including governors) undertake appropriate safeguarding training.
- The school keeps appropriate records that enable the efficient and effective response by the school to concerns over the wellbeing and safeguarding of pupils, supporting preventative action and enabling issues to be identified where they may be escalating or worsening, from an original known point.

While governing bodies have a role in exercising their disciplinary functions in respect of child protection allegations against a member of staff, they do not have a role in the consideration of individual cases, which will be investigated under arrangements set out in *"Safeguarding children in education: handling allegations of abuse against teachers and other staff"*

THE ROLE OF HEAD TEACHERS

In Carmarthenshire, Head teachers have a responsibility to ensure that:

- Safeguarding/child protection policies and procedures adopted by the governing body or proprietor are fully implemented and followed by all staff;
- Sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children; and

- All staff and volunteers understand the procedures for and are supported in raising concerns with regard to children in their care.
- Ensure that members of staff who are EWC registrants are aware of the Code of Professional Conduct and Practice for registrants with the Education Workforce Council and the expectation within the Code that the registrant has regard to the safety and well-being of learners in their care and related content.

THE ROLE OF THE DESIGNATED SAFEGUARDING LEADER IN SCHOOLS

The Designated Safeguarding Lead/Person (DSL) for safeguarding fulfils an essential role in developing and implementing policies that help to protect children from all forms of abuse and create a safe school environment.

The designated person should:

- Take lead responsibility for managing child protection/safeguarding issues and cases;
- Promote the interests of Looked After Children in their school;
- Be a member of the school's management team;
- Take responsibility for the school's child protection practice, policy, procedures and professional development.

THE ROLE OF THE SAFEGUARDING GOVERNOR IN SCHOOLS

The designated governor should:

- Take responsibility for all child protection matters.
- Ensure the governing body/proprietor undertakes an annual review of safeguarding policies and procedures that includes consideration of how its responsibilities have been discharged.
- Ensure the governing body reviews the school policies and procedures annually.

4. TRAINING

The School will be aware of national and local training requirements and guidance, which will include local safeguarding children's board guidance, advice and training opportunities.

All staff, whether permanent or temporary, and volunteers, as part of their induction will be given access to this policy, the Code of Conduct and the name and contact details of the DSL when they start work. They shall receive initial safeguarding training which will be updated every year at INSET.

Staff working in key pastoral roles will develop safeguarding expertise through keeping informed by updates from the safeguarding team and where possible training opportunities. DSLs evidence their on-going professional development in respect of safeguarding and child protection through undertaking biennial refresher training (every two years) through a recognised provider, in addition to other relevant specialist learning or training events.

The school will ensure that the Designated Safeguarding Leads will have received initial training when starting their role and continued professional updates as required. Specific updates as suggested by national and local requirements will be valuable.

All staff will be updated during the year as appropriate from the safeguarding team, especially where there are specific or emerging safeguarding topics to be aware of.

The governing body will also receive awareness raising training and the nominated governor will be offered opportunities for more specific training.

5. CHILD ABUSE & SPECIFIC SAFEGUARDING ISSUES

Child abuse and particularly child sexual abuse can bring about strong emotions in those facing such a situation and it is important to understand those feelings and not allow them to interfere with your professional judgement.

'Harm' is defined as:

- i. ill treatment this includes sexual abuse, neglect, emotional abuse and psychological abuse
- ii. the impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill treatment).
- iii. the impairment of physical intellectual, emotional, social or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment).

Child abuse may come to light in a number of ways:

- i. A child may tell you what has happened to them;
- ii. From a third party (e.g. another child);
- iii. Through the child's behaviour;
- iv. A suspicious, unexplained injury to the child.

'Significant harm' Section 31(10) of the Children Act 1989 states that "where the question of whether harm suffered by a child is significant turns on the child's health or development, his health or development shall be compared with that which could reasonably be expected of a similar child". All those who have contact with children should be able to recognise, and know how to act upon, evidence that a child's health or development is or may be being impaired especially when they are suffering or at risk of suffering significant harm

These notes are intended to provide a guide to help you identify signs of possible abuse and know what action to take in such cases.

The Main Forms of Abuse

Physical Abuse

The 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 or induces illness in a child whom they are looking after. Giving children alcohol, inappropriate drugs or poison is classified as physical abuse.

Sexual Abuse

Forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening, including:

- physical contact, including penetrative or non-penetrative acts
- non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or
- encouraging children to behave in sexually inappropriate ways.

Emotional Abuse

The persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional and behavioural development.

Neglect

The failure to meet a person's basic physical, emotional, social or psychological needs, which is likely to result in an impairment of the person's well-being (for example, an impairment of the person's health or, in the case of a child, an impairment of the child's development)

Abuse in all its forms can affect a child of any age. The effects can be so damaging that they may follow an individual into adulthood.

Identifying Signs of Possible Abuse

Recognising abuse is not easy, even for individuals who have experience of working with child abuse. Most children will receive cuts, grazes and bruises from time to time and their behaviour may give reason for concern. They may well be reasons for these factors other than abuse, but any concern should be immediately discussed with a senior colleague to assess the situation.

The school recognises that it has a responsibility to ensure that in safeguarding all pupils it must take into account the unique needs of certain members of its pupil body. This can include pupils with special educational needs or pupils for whom English is a second language. The school will ensure that each pupil's needs are taken into account whenever a discussion takes place, and will put appropriate measures in place to ensure that each pupil is comfortable and able to communicate.

Warning signs which may alert professionals to the possibility of abuse can include:

- i. Unexplained bruising, cuts or burns on the child, particularly if these are on parts of the body not normally injured in accidents;
- ii. An injury which a parent or carer tries to hide or for which they might have given different explanations;
- iii. Changes in behaviour such as the child suddenly becoming very quiet, tearful, withdrawn, aggressive, or displaying severe tantrums;
- iv. Loss of weight without a medical explanation;
- v. An inappropriately dressed or ill-kept child who may also be dirty;
- vi. Sexually explicit behaviour, for instance playing games and showing awareness which is inappropriate for a child's age;

- vii. Aggressive and inappropriate play;
- viii. Running away from home, attempted suicides, self-inflicted injuries;
- ix. A lack of trust in adults, particularly those who would normally be close to the child;
- x. Disturbed sleep, nightmares and enuresis particularly if a child has previously been dry;
- xi. Eating problems, including over-eating or loss of appetite.

Remember, the above signs do not necessarily mean that a child has been abused. If you are concerned about the welfare of a child, however, you must act. It is a legal duty, under the Social Services and Well-being (Wales) Act 2014 to inform the local authority if there is reasonable cause to believe that a child is at risk. Do not assume that someone else will help the child: they might not. Appendix A gives further information relating to symptoms

Female Genital Mutilation (FGM)

In the UK, all forms of FGM are illegal under the *Female Genital Mutilation Act 2003*. It is an offence (regardless of their nationality and residence status) to:
perform FGM in the UK

- assist the carrying out of FGM in the UK
- assist a girl to carry out FGM on herself in the UK
- assist from the UK, a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident.

The Act also makes it an offence for UK nationals or permanent UK residents to:

- perform FGM abroad
- assist FGM carried out abroad by a UK national or permanent UK resident – this includes taking a girl abroad to be subjected to FGM
- assist from outside the UK for FGM to be carried out abroad by a non-UK person on a girl or woman who is a UK national or permanent UK resident – this includes taking a girl abroad to be subjected to FGM
- assist a girl to perform FGM on herself outside the UK, even in countries where the practice is legal.

Any information or concern that a child is at immediate risk of, or has undergone, FGM should result in an immediate child protection referral. This is a **mandatory duty**.

The All Wales Child Protocol on Female Genital Mutilation provides advice on safeguarding girls from FGM

The Home Office has also produced multi-agency guidelines which outline the actions that should be taken by front-line professionals, such as teachers, health professionals, police officers and social workers, to protect girls and women and offer them the support they need.

If you have concerns that a girl or young woman may be taken overseas for FGM then you should immediately raise this concern with the DSL, who will be the Local Safeguarding Officer, or the Foreign and Commonwealth Office.

FORWARD is a UK organisation which provides support, counselling and safe space for girls and women to talk about their experiences. They can also educate and work with families to prevent FGM happening to any other girls in the family.

The NSPCC has a 24-hour helpline for anyone who is worried a child is at risk of, or has had FGM. You can call 0800 028 3550 or you can email fgmhelp@nspcc.org.uk.

Notify the DSL if you become aware of:

- A family arranging a long break abroad during the summer holidays, to a country where FGM is known practice.
- Unexpected, repeated or prolonged absence from school.
- Academic work suffering.
- A child may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

Indicators FGM may have taken place

A girl or woman who has had female genital mutilation (FGM) may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

The physical effects of FGM

FGM can be extremely painful and dangerous. It can cause:

- severe pain
- shock
- bleeding
- infection such as tetanus, HIV and hepatitis B and C
- organ damage
- blood loss and infections that can cause death in some cases.

Radicalisation and 'Prevent' Duty

Please refer to *PREVENT Policy*.

The "*Revised Prevent Duty: Guidance for England and Wales*" defines extremism as "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." The phrase 'fundamental British values'

relates to those national values that are considered to under-pin British society and democratic principles. Those values are:

- democracy
- the rule of law
- individual liberty
- mutual respect and tolerance of different faiths and beliefs

In 2011, Welsh Government published guidance *Respect and resilience: Developing community cohesion* – a common understanding for schools and their communities which sets out the role that schools have in developing and supporting strategic approaches to promoting and maintaining community cohesion and eradicating violent extremism.

In 2012 the UK Government launched a refocused Prevent strategy. This strategy contained objectives to:

- respond to the ideological challenge of terrorism and the threat from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address.

The school will work with statutory safeguarding partners (such as local authorities, the police, the NHS and youth and offender management services) to:

- identify individuals at risk of being drawn into terrorism
- assess the nature and extent of that risk
- develop the most appropriate support plan for the individuals concerned.

The school will follow its mandatory duty to refer all concerns to the appropriate agencies.

The Estyn review *“Prevent – how well maintained schools implement their duties under the Counter-Terrorism and Security Act 2015”* published in February 2020 provides further information to support schools, making the following recommendations:

- Include risks to pupils from radical and extremist ideologies in the school’s policies, in particular policies that cover ICT and online safety
- Record and report all incidents of racist language and racial bullying properly, and offer suitable support and challenge to victims and perpetrators
- Acknowledge that radicalisation and extremism are real risks to pupils in all schools, and ensure that staff training, policies and the curriculum suitably address these risks
- Ensure that all pupils have a voice and can share with the school any concerns they have about behaviours or expressions of radical or extremist ideas

Peer on peer abuse: Sexual violence and sexual harassment between children

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. Children 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. It is important that all victims are taken seriously and offered appropriate support.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

The school and its staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenging 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; and
- understanding that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language.

Children with Additional Learning Needs and/or disabilities (ALN) are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in children with ALN. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- the potential for children with ALN being disproportionately impacted by
- behaviours such as bullying and harassment, without outwardly showing any signs; and communication barriers and difficulties overcoming these barriers.

Children who are lesbian, gay, bi, or transgender (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Forced marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is illegal in Great Britain. It is recognised

as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. It is important to recognise that it can happen to school-age pupils.

A marriage must be entered into with the free and full consent of both parties. An arranged marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

In some cases, young people may be taken abroad without knowing that they are to be married. When they arrive in that country, their passport(s)/travel documents may be taken to try to stop them from returning to the UK.

Mental health difficulties resulting in self-harm, suicidal thoughts or behaviour

Childhood should be the happiest time in a person's life, yet for thousands of children who develop mental illness in childhood or adolescence, the reality can be very different. One in ten (around 850,000) children and young people have a diagnosable mental health condition. These illnesses can have a devastating impact on their physical health, their relationships and their future prospects. The challenge often extends into a person's adult life, with half of all mental health conditions beginning before the age of 14.

We know that people with mental health problems haven't had the same level of support as those with physical illnesses in the past, while young people with other conditions, such as learning difficulties or long-term medical conditions, are more likely to experience mental ill health, as are children in care or those who have suffered abuse or neglect in the past.

The school's safeguarding team is vigilant to the range of mental health difficulties which pupils may experience and creates numerous opportunities for pupils to access support, including an external professional counsellor who visits the school weekly. Some mental health conditions have an increased risk of self-harm and suicidal thoughts or behaviour, which are warning signs that should be passed on. Staff are trained in what signs could indicate a pupil who is struggling with a mental health difficulty, in order to pass their concerns on to the safeguarding team, so that they may liaise with parents and any relevant external agencies.

Having due regard for the guidance "Responding to issues of self-harm and thoughts of suicide in young people" document no: 249/2019, the following principles will be used by staff when responding to disclosures of self-harm or suicidal thoughts. The school will follow and train staff in the guidance to enable best practice.

- Stay non-judgemental. Don't make the young person feel 'bad'.
- Use neutral terms like 'trying to end your life' rather than 'commit suicide', which implies an offence.
- Treat the young person with respect – don't 'talk down' to them.

- Be patient and give the young person time. Don't pressure them.
- Listen to what they have to say.
- Don't try to use authority to force them to stop any self-harm. Don't threaten or try to coerce them.
- Be aware of body language – eye rolls, folded arms, a cross look, sighs can make a young person seeking help feel like they are wasting your time.
- Be aware of any preconceptions and prejudices you may hold about self-harm and/or suicidal thoughts.
- Don't make assumptions about the young person based on any disclosure. Even if the young person has disclosed self-harm and/or suicidal thoughts before, their reasons and motivation may be different.
- Be honest with the young person about your role and the limits of confidentiality.
- Don't dismiss 'minor wounds' or non-lethal attempts to end life as unimportant. The severity of injury has no relation to the degree of distress that led to it.
- Use a safe place to discuss self-harm and suicidal thoughts – somewhere private, calm and quiet, where you are unlikely to be interrupted
- Try to make sure you have enough time for a conversation.

It is important to recognise that mainstream schools can only provide a defined level of help, even where outside agencies and healthcare practitioners are assisting. Severe or serious difficulties in our opinion requiring a high level of safety supervision and/or presenting a risk to themselves or others, are likely to result in families being asked to secure a place at a more specialist setting which can more safely meet the needs seen.

Voyeurism

The Criminal Prosecution Service (CPS) defines 'up skirting' and 'down-blousing' as colloquial terms referring to the action of placing equipment such as a camera or mobile phone beneath or above a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders. It can occur amongst pupils in a school environment.

The school has a detailed Pupil Photography Policy which covers in detail appropriate circumstances for photography, such as for marketing purposes. This largely applies to staff and therefore individual guidance is given to pupils by their form tutors as part of our PSHE programme, educating pupils on e-safety but also their obligations with regard to safe and appropriate use of photographic equipment and camera phones.

Physical punishment by parents or carers

In 2022, physically punishing children became illegal in Wales. This can mean smacking, hitting, slapping and shaking. But there are other types too. It is not possible to give a set list of what makes up physical punishment because it can be anything where a child is punished using physical force. Research suggests that any type of physical punishment could be harmful to children. The new law gives children the same

protection from assault as adults. The law applies to parents or anyone who is responsible for a child while the parents are absent. It applies to visitors to Wales too. The school recognises the challenges of parenting and encourages various approaches and methods for discipline which are non-physical and bring about positive change. Welsh Government provide a range of online resources for parents which schools can signpost families to.

Drugs, alcohol, tobacco and other psychoactive substances

The school has a separate policy which covers the identification of problems related to the above and our approach to safeguarding young people from related harms.

6. PREVENTION

Abuse is more likely to be prevented or reported quickly if pupils have high self-esteem, confidence, supportive friends and open lines of communication with trusted adults.

At St. Michael's School we will:

- i. maintain an ethos where pupils feel secure and are encouraged to talk and where they believe adults and prefects will listen;
- ii. make sure that pupils know that there are adults in the school whom they can approach if they are worried or are in difficulty;
- iii. include in the curriculum and in activities and PSHE lessons opportunities for pupils to gain self-esteem and confidence so they gain the skills to stay safe and to know to whom to turn for help;
- iv. include in the curriculum material which will help pupils to gain a supportive and caring attitudes to others.
- v. Have robust anti-bullying and anti-cyberbullying procedures and respond to every instance of bullying (alleged or suspected).
- vi. Monitor pastoral matters carefully as possible indicators of safeguarding concerns.

In order to help protect pupils from possible harm, members of staff are asked to take any adult who is looking for a pupil to the School Reception.

7. PROCEDURES & RESPONDING TO CONCERNS

If you think a child is in immediate danger, contact the police on 999. If you are worried about a child but they are not in immediate danger, you should share your concerns by following the guidance in this policy. See Appendix E for a flowchart.

Keeping Learners Safe states that: "Suspicion about a child being at risk may take the form of concerns rather than known facts. Concerns about a child at risk can arise in many different contexts, including when a child is already known to social services. It is important that these concerns are logged, recorded and appropriately monitored by the member of staff and/or the DSP. This ensures that a coherent picture exists of the likelihood of abuse, neglect and other kinds of harm and provides support for a report to social services and any subsequent action."

The procedures followed at St. Michael's School are in line with the All Wales Child Protection Procedures.

The school will:

- i. Ensure that senior members of staff are designated with the lead responsibility for child protection.
- ii. Ensure that DSLs & DDSLs have undertaken the appropriate training and meet regularly to discuss safeguarding provision within the school.
- iii. Inform staff and governors of the names of the designated members of staff.
- iv. Have procedures in place to take forward concerns when the designated persons are unavailable.
- v. Ensure that members of staff are aware of the need to be vigilant for signs of abuse and that they will know how to respond to a pupil who may tell of abuse.
- vi. Ensure that parents are sent information about the school's Safeguarding and Child Protection arrangements.
- vii. Provide appropriate training for staff so that they understand their personal responsibilities, know the school's procedures, are vigilant and know how to support a pupil who tells of abuse.
- viii. Ensure that there are robust physical restraint procedures in place and that all staff are trained accordingly.
- ix. Notify the social services if a pupil on the child protection register is excluded from the school for a fixed term or permanently; or if there is an unexplained absence of a pupil on the child protection register of more than two days duration, or one day following a weekend.
- x. Maintain links with relevant agencies and cooperate as required with their enquiries regarding child protection matters including attendance at initial case conferences, core groups and child protection review conferences.
- xi. Keep written records of concerns about children even when there is no need to refer the matters to social services. These records will include date, event and action taken. These records will be confidential and kept in secure, locked locations.
- xii. Ensure that all staff are DBS checked and that all new staff are checked in accordance with Welsh Government statutory guidance "*Keeping Learners Safe*".
- xiii. Designate Governors for Safeguarding.
- xiv. Act on any concerns about pupils who have been exposed to radicalisation, in accordance with our Prevent Policy (Anti-Radicalisation).
- xv. Ensure that pupils with special educational needs are appropriately provided for and seek immediate support when a concern is raised by or about a pupil with SEN.

When a member of staff sees signs in the behaviour or attitude of a pupil which causes him or her concern, one of the members of staff responsible for Child Protection (DSL/DDSL) must be informed. If, in the judgement of the DSL, a referral needs to be made, they will inform (within 24 hours in writing, or with written confirmation of a telephone referral) the relevant child protection/safeguarding service.

- i. If an allegation is made against a member of staff then this must be reported to the Headmaster.

- ii If the cause for concern is the member of staff responsible for Safeguarding & Child Protection, either the DSL or Deputy DSL(s), then the member of staff should inform the Chair of Governors.
- iii If the cause for concern is the Headmaster then the Chair of Governors should be contacted.

If urgent action needs to be taken then the police should be notified at the earliest possible opportunity.

Further information and advice on these matters is available from the DSL.

The DSL has the responsibility for raising staff awareness of child protection matters. This will include ensuring the Safeguarding & Child Protection Policy is provided to new staff, making current staff aware of changes in the procedure and meeting with new staff to explain and answer questions on the procedures.

Listening to the Child

- i Don't make promises which you may not be able to keep. Don't promise to keep what you have been told a secret as you have a responsibility to disclose information to those who need to know and they may be able to help.
- ii Remember that the child's welfare is paramount and this must be the most important consideration.
- iii Listen carefully to any complaint or allegation by the child and tell and show the child that you are taking them seriously.
- iv Keep questions to a minimum but make sure you are absolutely clear about what a child has said so that you can pass on this information to professionals who are trained and experienced in investigating possible child abuse. Do not prompt or ask leading questions.
- v Acknowledge how difficult and painful it must have been for them to confide in you and reassure the child, stressing that they are never to blame.
- vi Stay calm: don't take hasty or inappropriate action.
- vii As soon as possible after talking with the child make a written record of what the child said, how they were behaving, and what you did in response. Use their exact words if possible.
- viii Note the date, time, place and names of those present and then sign this record and take it to the DSL as soon as possible after the meeting. Appendix B gives a template form. Alternatively, the school 'conversation record' form can be used. All conversations must be recorded on the appropriate conversation records, promptly.

Talking to Parents and Carers

When reading this section it must be remembered that the safety of the child must be paramount.

It is possible that a relationship with parents and carers will have been established and as a general principle it is important to be open and honest when dealing with them.

There may be circumstances, however, when it is not appropriate for parents to be informed immediately of the concerns you have, as this may prejudice any investigation and may place the child at even greater risk.

Always discuss your concerns first with the DSL (contact with parents should be delayed until advice has been sought from one of the professional agencies who have been notified).

Privately fostered children

The Children Act 2004 establishes the duty of all local authorities to promote awareness of the need to notify them about any privately fostered children living in their area. In 2011, Welsh Government published *Protecting Children, Supporting Foster Carers: A Toolkit for Dealing with an Allegation of Abuse* to assist fostering services in the public and independent sectors, and child protection managers in dealing with allegations against foster carers.

The school recognises its duty to notify the local authority of any private fostering arrangement that comes to their attention where they are not satisfied that the local authority has been, or would be, notified of the arrangement. It is good practice to inform the foster parents of the referral but if it is considered that this could place the child at risk of harm then it is not necessary to obtain consent.

The Children Act 1989 creates a number of offences in connection with private fostering, including failure to notify an arrangement or to comply with any requirement or prohibition imposed by the authority. The Children Act 2004 strengthens local arrangements for notification.

Responding to Child Abuse: What to do if you are concerned

Remember that it is not your responsibility to decide if child abuse has occurred, but it is your responsibility to take action, however small your concern.

Your first step must be to inform the DSL (or DDSL) who will take responsibility for seeking any additional advice and for contacting the local Social Services Department or the police who are trained to deal with such situations and have the necessary legal power to protect the child.

If a DSL is not available, or concerns for the child remain, then you must contact the local Care in Wales office, Social Services Department, the Police or the NSPCC yourself. It is a legal duty (Social Services and Well-being (Wales) Act 2014) to raise a concern if there is due cause to do so. There will be immunity from disciplinary action against staff for “whistle blowing” in good faith.

The agency receiving your referral will take responsibility for ensuring that appropriate investigations are undertaken and the child protected.

The DSL and the main School Office have the contact details of the South & West Wales Child Protection Board/CYSUR. The DSL liaises with the designated officer for

Safeguarding in Education (Carmarthenshire) and the central referral team as necessary.

The Carmarthenshire Social Services Central Referral Team can be contacted at:
Phone: 01554 742322

Referrals

Referrals are made by the DSLs, the Deputy DSLs or by a designated member of staff who has informed the DSL or Deputy DSL that they are going to make a referral.

All records are collated (internal referral forms; conversation records and any other relevant information).

In most instances a preliminary discussion will be held between the DSL and the appropriate Children's Services agency. This is to ensure that the correct information that is required, is shared.

A multi-agency referral form will be filled out and submitted. A copy will be held securely in the pupil's safeguarding file, alongside all subsequent documentation.

The DSL or person making the referral may attend strategy meetings relevant to the case. Minutes of these meetings will be taken by a nominated minute-taker and a record will be kept on the pupil's safeguarding file.

8. SUPPORTING PUPILS AT RISK

St. Michael's School recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth or view the world as a positive place. School may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, whilst at school their behaviour may still be challenging and defiant or they may be withdrawn.

The School will support pupils through:

- i The curriculum to encourage self-esteem and self-motivation.
- ii The school ethos which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued.
- iii The implementation of a good behaviour policy.
- iv A consistent approach which will ensure the pupil knows that some behaviour is unacceptable but that they are always valued.
- v A commitment to develop productive, supportive relationships with parents.
- vi The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in child protection situations.
- vii Recognition that statistically children with behavioural difficulties and disabilities are most vulnerable to abuse. Members of staff who work in any capacity with children with profound and multiple disabilities, sensory

impairment and / or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.

- viii Recognition that in a home environment where there is domestic violence, drug or alcohol abuse, children are vulnerable and in need of considerable support and/or protection.

The School will enable pupils to share their concerns as easily as possible, by:

- i Ensuring they understand the pastoral system and all the various people who are close at hand and able to listen to them.
- ii Ensuring, through safeguarding posters in most classrooms and communal areas, that pupils are aware of the safeguarding team and their remit.
- iii Highlighting in induction and at the start of each year, the sections in the 'welcome guide' and homework diaries which provide information on how to share safeguarding concerns.
- iv Providing opportunities in PSHE provision to discreetly share any concerns, present or past, which may be triggered by the subject matter being presented.
- v Adopting a shared understanding that there's no problem or issue too small.
- vi Accepting written concerns over school email systems for those who feel unable to initially share them face to face.
- vii Encouraging prefects to play a part in spotting and reporting any concerns.

9. BEHAVIOUR

The school has outlined in the Appendix behaviours, expected from all adults, which clearly state our values and expectations.

10. RECORDS AND RECORD KEEPING

Well-kept records are essential in situations where it is suspected that a child may be at risk of harm.

All establishments, organisations and services in Carmarthenshire are required to maintain accurate and relevant child protection/safeguarding records. These records must be kept in a secure place and separate from all other records pertaining to the child. These Child Protection Records should be accessed and maintained by the designated person/s only. Records should be clear, accurate, timed and dated with all actions and decisions recorded.

Information sharing and the transfer of sensitive records is required from time to time, for example when a child transfers to the school or to another school. Secure delivery is used as appropriate and in some cases, 'in person' delivery where necessary for the proper security of the information being transferred. Each situation is risk-assessed.

11. BULLYING

St. Michael's School are committed to providing a friendly, caring environment for all our pupils and staff. We are committed to every person and our ethos is positive and inclusive. Bullying, in any form, is contrary to our principles and will not be tolerated.

All members of the community have the right to work in a secure and caring environment. They also have a responsibility to contribute to the protection and maintenance of such an environment.

See *Anti-Bullying Policies* for further information.

Welsh Government guidance *Respecting Others: Anti-Bullying Guidance (24/2003)* provides information on tackling bullying in schools and the steps to be taken to support children and young people who report bullying outside school. It offers guidance on:

- bullying around race, religion and culture
- bullying involving children with special educational needs and disabilities
- homophobic bullying
- sexist, sexual and transphobic bullying
- cyberbullying – advances in communication technologies, and access to them by children and young people, has required schools to be vigilant and innovative in finding solutions to their misuse.

Tackling Hate Crimes and Incidents: A Framework for Action was launched by Welsh Government in May 2014. Welsh Government has funded a children and young person's helpline through MEIC Cymru and a National Hate Crimes and incidents Centre through Victim Support Cymru.

12. PHYSICAL INTERVENTION

See *Physical Restraint Policies* for further information:

As part of our effective Safeguarding procedures, we recognise that there may be rare occasions where physical intervention is necessary. Physical intervention should only ever be used to:

- Maintain the safety of pupils and staff
- Prevent serious breaches of school discipline
- Prevent serious damage to property

Corporal Punishment

Under no circumstances should any form of corporal punishment be used upon a pupil.

Reasonable Force

There may be occasions when circumstances warrant the restraining of a child – holding the child against their will.

The law does not lay down precise acts of force which are deemed 'reasonable' in given circumstances. Its use will always depend upon the particular circumstances.

The use of force can be minimised by:

- Creating a calm environment that minimises the risk of incidents
- De-escalating incidents if they do arise

- It is important to communicate calmly with the pupil, using non-threatening behaviour and language, ensuring the pupil can see a way out of a situation. Strategies might include going to a quiet room away from bystanders.

Restraint is only used when the risks involved in doing so are outweighed by the risks involved in not using force.

13. WHISTLEBLOWING

The school has a policy and procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about abuse, fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the organisation to one or more of the following: Social Services, Care in Wales, EWC (Education Workforce Council, the registration body for teachers in Wales) or ESTYN. Please see the school's Whistleblowing Policy.

Date reviewed: September 2023

Date for next review: September 2024

Person responsible for this policy: Headmaster

APPENDIX A
CHILD PROTECTION
CHECKLIST OF SIGNS AND SYMPTOMS OF ABUSE

1. Signs of physical abuse

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Untreated injuries
- Admitting to punishment that appears to be excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered during hot weather
- Fear of returning home
- Self-destructive tendencies
- Aggression towards others
- Running away

2. Signs of emotional and verbal abuse

- Physical, mental and emotional development lags behind that of others of a similar age
- Admitting to punishment that appears excessive
- Over-reaction to mistakes
- Continued self-depreciation
- Sudden speech disorders
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (rocking, hair twisting, thumb sucking)
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Running away
- Depression & anxiety
- Compulsive stealing, scavenging

3. Signs of neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self-esteem
- No social relationships

- Running away
- Compulsive stealing or scavenging

4. Signs of sexual abuse

- Sudden changes in behaviour or school performance
- Displays of affection in a sexual way inappropriate to age
- Tendency to cling or need constant reassurance
- Tendency to cry easily
- Regression to younger behaviour (thumb-sucking, acting like a baby)
- Complaints of genital itching or pain
- Distrust of familiar adults
- Unexplained gifts (money or kind)
- Anxiety, depression, suicidal thoughts or withdrawal or apparent secrecy
- Wetting, day or night
- Sleep disturbances/nightmares
- Anorexia/bulimia
- Unexplained pregnancy
- Fear of undressing for PE, Games and in the boarding house
- Phobias or panic attacks

APPENDIX B: To be used in the event of needing to make a record or risk assess.



St. Michael's School

Confidential Pupil Risk Assessment

Pupil:

Date and author of assessment (including review dates and frequency):

Personal Form Tutor:

Parental and key agency contacts

Overview of concerns

Who needs to be aware?

How are these people informed?

Strategies and support in place:

APPENDIX C - GUIDELINES ON THE PREVENTION OF ALLEGATIONS OF ABUSE

This should be read in conjunction with the Staff Code of Conduct

1. Context

- a. Staff working in education settings have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help adults establish the safest possible learning and working environments which safeguard children and young people and reduce the risk of adults working with them being falsely accused of improper or unprofessional conduct.
- b. This means that these guidelines:
 1. apply to all adults working in education settings whatever their position, role or responsibilities;
 2. may provide guidance where an individual's suitability to work with pupils has been called into question.

2. Curriculum

- a. Staff should be aware that curriculum content can sometimes include subject matter which is sexually explicit or of an otherwise sensitive nature. Care should be taken to ensure that curriculum materials cannot be misinterpreted and clearly relate to the learning outcomes identified for that lesson. Schemes of work should highlight particular areas of risk and sensitivity.
- b. The curriculum can sometimes include or lead to unplanned discussion about subject matter which is sexually explicit, or of an otherwise sensitive nature. Responding to pupils' questions may require careful judgement and staff may wish to take guidance in these circumstances. This means that staff should not enter into or encourage inappropriate or offensive discussion about sexual activity.
- c. Care should also be taken to abide by the School's policy on sex education and the wishes of parents who have the right to withdraw their children from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction).
- d. This means that all adults should:
 1. have clear written lessons plans;
 2. take care when encouraging pupils to use self expression, not to overstep personal and professional boundaries;
 3. be able to justify all curriculum materials and relate these to clearly identifiable lessons plans.
- e. This means that all adults should not:
 1. enter into or encourage inappropriate discussions about sexual activity or any behaviours which may offend or harm others.

3. Physical Education and other activities, which require physical contact

- a. Some staff, those who teach PE and games or who offer music tuition, for example, will on occasions have to initiate physical contact with pupils in order to support a child so they can perform a task safely, to demonstrate

the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's, usually verbal, agreement.

- b. Contact under these circumstances should be for the minimum time necessary to complete the activity. This means that staff should:
 - 1. consider alternatives where it is anticipated that a pupil might misinterpret any such contact perhaps involving another member of staff or a less vulnerable pupil in the demonstration;
 - 2. always explain to a pupil the reason why contact is necessary and what form that contact will take.
- c. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.
- d. Staff must remember:
 - 1. never to touch a child in a way which may be considered indecent;
 - 2. to always be prepared to explain actions and accept that all physical contact should be open to scrutiny;
 - 3. never to indulge in horseplay, tickling or fun fights;
 - 4. they should not use an object, such as a stick, to make physical contact;
 - 5. physical contact should never be secretive, or for the gratification of staff, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded in writing as soon as possible and given to CPLO with a copy placed on the child's file.
- e. This means that adults should:
 - 1. be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described;
 - 2. never touch a child in a way which may be considered indecent;
 - 3. always be prepared to report and explain actions and accept that all physical contact should be open to scrutiny;
 - 4. not indulge in horseplay;
 - 5. always encourage children, where possible, to undertake self-care tasks independently;
 - 6. work within Health and Safety regulations;
 - 7. be aware of cultural or religious views about touching and always be sensitive to issues of gender;
 - 8. understand that physical contact in some circumstances can be easily misinterpreted.

4. **Trips and off site visits**

- a. These guidelines must apply to residential/non residential visits. Aspects of Child Protection must be included in the Risk Assessment where appropriate. Always refer to Keeping Learners Safe.
- b. Particular attention must be paid to:
 - 1. when pupils are staying with host families, staff must be aware of any vetting process that goes on in-country and by the local school/agent;

2. when pupils are staying in a residential centre/hostel/hotel. Pupils must only stay in accredited, official and recognised venues and must seek assurance that appropriate child protection checks are in place.

5. **Internet use**

- a. Members of staff are permitted to use portable devices appropriately. The school has clear policies and an Acceptable Users Policy about access to and the use of the internet. Under no circumstances should staff in school access inappropriate images.
- b. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material, is behaviour that, if proven, will invariably result in the individual being barred from work with children and young people.
 1. In general a person's private activities, including use of the internet, that does not involve child pornography or other illegal material, will not impinge on his or her suitability to work with children. However, using school or college equipment to access other inappropriate or indecent material, including adult pornography, will give grave cause for concern, particularly if as a result pupils might be exposed to inappropriate or indecent material. Staff should be aware that this would be construed as gross misconduct under the school's normal disciplinary procedures.
 2. No pupil should use a member of staff's personal portable device or have access to the staff shared area.
- c. This means that The School should:
 1. have clear e-safety policies in place about access to and use of the internet;
 2. make guidance available to both adults and pupils about appropriate usage.
- d. This means that all adults should:
 1. follow their school's guidance on the use of portable devices;
 2. ensure that children are not exposed to unsuitable material on the internet;
 3. ensure that any films or material shown to pupils are age appropriate.

6. **One-to-one situations**

- a. Every organisation working with or on behalf of children and young people should consider one-to-one situations when drawing up their policies. This includes schools and other education settings.
- b. It is not realistic to state that one-to-one situations should never take place. It is, however, appropriate to state that where there is a need, agreed with a senior manager and/or parents/carers, for an adult to be alone with a child or young person, certain procedures and explicit safeguards must be in place. Adults should be offered training and

guidance in the use of any areas of the workplace which may place themselves or children in vulnerable situations.

- c. One-to-one situations have the potential to make a child/young person more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one-to-one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one-to-one situations are unavoidable, reasonable and sensible precautions are taken. Every attempt should be made to ensure the safety and security of pupils and the adults who work with them.
- d. There are occasions where managers will need to undertake a risk assessment in relation to the specific nature and implications of one-to-one work. These assessments should take into account the individual needs of the child/young person and the individual worker and any arrangements should be reviewed on a regular basis.
- e. Pre-arranged meetings with pupils away from the school premises should not be permitted unless approval is obtained from their parent and the Headmaster or other senior colleague with delegated authority.
- f. This means that adults should:
 - 1. ensure that when lone working is an integral part of their role, full and appropriate risk assessments have been conducted and agreed;
 - 2. avoid meetings with a child or young person in remote, secluded areas;
 - 3. always inform other colleagues and/or parents/carers about the contact(s) beforehand, assessing the need to have them present or close by;
 - 4. avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.
 - 5. always report any situation where a child becomes distressed or angry to a senior colleague;
 - 6. carefully consider the needs and circumstances of the child/children when in one-to-one situations.

7. **Transporting pupils**

- a. In certain situations, e.g., out of school activities or medical emergencies, staff or volunteers may be required to transport children. The Deputy Head should be notified of any journeys.
- b. Staff should not transport children alone, whenever practicable.
- c. Children should sit in the back of a car only, with seatbelts on.
- d. This means that The School should have appropriate policies for transporting pupils.
- e. This means that adults should:
 - 1. ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive;

2. be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer;
3. record details of the journey in accordance with agreed procedures;
4. ensure that their behaviour is appropriate at all times;
5. ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven;
6. ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.

8. **First Aid and administration of medication**

- a. Only staff who are trained should administer First Aid. When administering First Aid, staff should ensure that other adults or children are present, or aware of the action being taken, even in extreme emergency circumstances, whenever possible. Parents should always be informed when First Aid has been administered.
- b. This means that staff should:
 1. make other staff aware of the task being undertaken;
 2. explain to the child what is happening.
- c. Ideally, First Aid and administration of medicine should be carried out by the Medical Centre staff. The School adheres to the policies and agreed procedures of its Medical Centre staff regarding the administration of medication.
- d. This means that school should:
 1. ensure staff understand the extent and limitations of their role in applying basic care and hygiene tasks for minor abrasions and understand where an injury requires more experienced intervention;
 2. ensure there are trained and named individuals to undertake first aid responsibilities;
 3. ensure training is regularly monitored and updated;
 4. always ensure that arrangements are in place to obtain parental consent for the administration of first aid or medication.

9. **Photography, video and other creative arts**

- a. Many school activities involve the taking of images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement.
- b. Using images of children for publicity purposes will require the consent of either the individual concerned or in the case of under-age pupils, their legal guardians. This means that images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the school have access.
- c. This means that staff should:
 1. be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded;

2. ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose;
 3. ensure that all images are available for scrutiny in order to screen for acceptability;
 4. be able to justify images of children in their possession;
 5. avoid making images in one-to-one situations;
 6. Where possible use school equipment.
- d. It is recommended that when using a photograph the following rules should be followed:
1. if the photograph is used, avoid naming the pupil, unless the photograph is to be used by the local press and permission has been given;
 2. if the pupil is named, avoid using his/her photograph;
 3. the School establishes whether the image will be retained for further use;
 4. images are securely stored and used only by those authorised to do so.
- e. This means that staff should not take or distribute images of children unless they have the consent of both the child and parents.
- f. This means that adults should:
1. be clear about the purpose of the activity and about what will happen to the images when the activity is concluded;
 2. be able to justify images of children in their possession;
 3. avoid making images in one-to-one situations or which show a single child with no surrounding context;
 4. ensure the child/young person understands why the images are being taken and has agreed to the activity and that they are appropriately dressed;
 5. only use equipment provided or authorised by the school;
 6. report any concerns about any inappropriate or intrusive photographs found;
 7. always ensure they have parental permission to take and/or display photographs.

10. Showers and changing

- a. Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be a required level of supervision to safeguard young people and satisfy health and safety considerations and to ensure that bullying or teasing does not occur. The supervision will need to be appropriate to the needs, age and gender of the young people concerned.
- b. Staff, therefore, need to be vigilant about their own behaviour. This means that staff should:
 1. announce their intention of entering changing rooms;
 2. avoid remaining in changing rooms unless a pupil's needs require it;
 3. avoid any physical contact when children are in a state of undress;
 4. avoid any visually intrusive behaviour;

5. not change in the same place as children;
6. not shower with children.

11. **Communication with pupils**

- a. Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, personal emails, digital cameras, videos, web-cams, websites and blogs.
- b. Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.
- c. Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.
- d. They should not give their personal contact details to pupils including personal email, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents/carers. Personal email or text communications between an adult and a child/young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through websites.
- e. This means that adults should:
 1. ensure that personal social networking sites are set as private and pupils (past & present) are never accepted as approved contacts;
 2. never use or access social networking sites of pupils;
 3. not give their personal contact details to pupils, including their mobile telephone number;
 4. only use equipment, e.g., mobile phones, provided by school/service to communicate with children, making sure that parents have given permission for this form of communication to be used;
 5. only make contact with children for professional reasons and in accordance with any school/service policy;
 6. recognise that text messaging should only be used as part of an agreed protocol and when other forms of communication are not possible;
 7. not use internet or web-based communication channels to send personal messages to a child/young person.

12. **Social contact**

- a. Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship, pursuing or strengthening a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that contact could be misconstrued.
- b. This means that staff should:
 1. always approve any planned social contact with senior colleagues;

2. advise senior management when regular social contact occurs through activities not linked to school;
3. report and record any situation which, they feel, might compromise the school or their own professional standing.

13. Pupils in distress

- a. There may be occasions when a distressed pupil needs comfort and reassurance. This may include appropriate physical contact. Staff should remain self-aware at all times to ensure that their contact is not threatening or intrusive and not subject to misinterpretation.
- b. This means that staff should:
 1. consider the way in which they offer comfort to a distressed pupil;
 2. always tell a colleague when and how they offered comfort to a distressed child;
 3. record any situation which may give rise to concern.

14. Intimate Care

There are only very limited circumstances where this should ever be necessary and when it is rarely required it is usually a very young child who has soiled themselves very significantly and needs support to change their clothing to clean items. Dignity should be preserved as much as possible and parents informed the same day at collection time.

15. Sexual contact with young people

- a. A young person is classified as under 18 years of age or in full-time (secondary/tertiary) education. Sexual contact with a pupil in school, regardless of age, is a criminal offence as it constitutes a breach of our duty-of-care. Activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- b. Adult behaviour may also involve 'grooming' a child. This can involve an adult conferring special attention and favour upon a child with the intent of sexually abusing him/her at a future point.
- c. This means that staff should not pursue sexual relationships with children and young people either in or out of school.
- d. Avoid any form of communication with a child or young person which could be misinterpreted as sexually suggestive or provocative, i.e., verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact. Sexual behaviour towards and/or developing a sexual relationship between a member of staff with any young person is inappropriate and illegal. This behaviour is considered as gross misconduct and will result in immediate suspension pending investigation.

16. Gifts

- a. Receiving of gifts is essentially inadvisable as it may be inappropriate and in some cases constitute a criminal offence. Of course, there are occasions

when children wish to pass small tokens of appreciation to staff at Christmas time or as a thank-you gift. In the context of creating safe working practices it is also inadvisable to give or receive gifts regularly or of any value to individual young people. This could be misinterpreted by the pupil, their parents/carers or other adults. It can be misconstrued as a gesture either to bribe or single out the young person and it might be perceived that a 'favour' of some kind is expected in return. Please see the Staff Code of Conduct for more detail on this area.

- b. This means that staff should:
 1. ensure that gifts received or given in situations which may be misconstrued should be declared;
 2. not give preferential treatment to any individual young person on account of any gift given;
 3. ensure that any gifts given to pupils as a part of a reward system are small and an accepted part of school practice.

17. **Infatuation**

- a. Staff need to be aware that it is not uncommon for a pupil to develop an infatuation for a member of staff. Staff should be aware that pupils can be strongly attracted to a member of staff and may develop a heterosexual or homosexual infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. A member of staff who becomes aware that a pupil may have developed an infatuation (for themselves or a colleague) should discuss this at the earliest opportunity with a member of the SLT so that appropriate action can be taken, where necessary.

18. **Dress and appearance**

- a. It is necessary and wise for staff to consider the manner of dress and appearance appropriate to their professional role as opposed to that which may be adopted in their personal life. This means that staff should wear clothing which:
 1. promotes a positive and professional image;
 2. is appropriate to their role;
 3. may not be viewed as offensive, revealing, or sexually provocative;
 4. does not distract, cause embarrassment or give rise to misunderstanding;
 5. is absent of any slogans.
 6. doesn't reveal tattoos which may be frightening, ambiguous or offensive.
- b. Staff who dress or appear in a manner which could be considered as inappropriate or offensive, could render themselves vulnerable to criticism or allegation and should expect guidance from senior staff.

19. **Searching**

- a. If an investigation or an allegation leads to a decision to search a pupil, their clothes, bags or locks, two staff members must be present while the search is conducted. The school's Pupil Search Policy will be followed.
- b. Pupils must be asked to empty pockets and bags themselves.

20. Personal Care

- a. Young people, particularly in boarding, are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions when there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.
- b. Adults need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils with whom they work.
- c. This means that all adults should:
 - 1. avoid any physical contact when children are in a state of undress;
 - 2. avoid any visually intrusive behaviour;
 - 3. announce their intention of entering where there are changing rooms.
- d. This means that adults should not:
 - 1. change in the same place as children;
 - 2. shower or bathe with children;
 - 3. assist with any personal care task which a child or young person can undertake by himself/herself.

21. Use of Personal Living Space

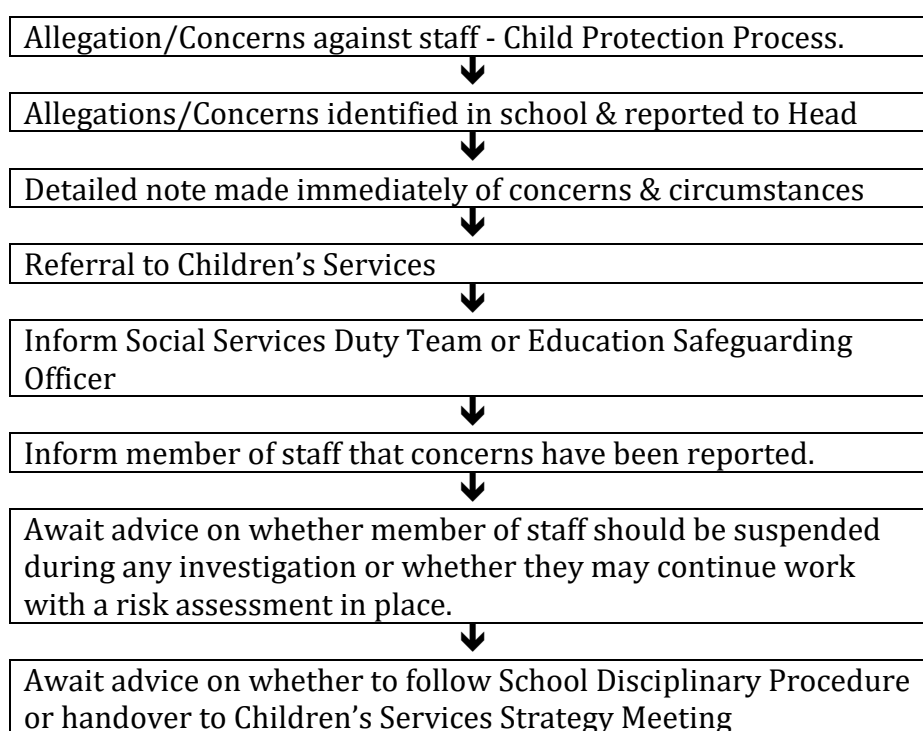
- a. No child or young person should be in or invited into, the home of boarding staff who work with them, unless the reason for this has been firmly established and agreed with parents and a senior manager.
- b. Under no circumstances should pupils assist with chores or tasks in the home of an adult who works with them. Neither should they be asked to do so by friends or family of that adult.
- c. This means that adults should:
 - 1. be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations;
 - 2. challenge any request for their accommodation to be used as an additional resource for the school or school/service;
 - 3. be mindful of the need to maintain professional boundaries;
 - 4. refrain from asking pupils to undertake personal jobs or errands.

APPENDIX D DEALING WITH AN ALLEGATION AGAINST A MEMBER OF STAFF OR ADULT

This flowchart should be used as a brief checklist of procedure in the event of an allegation against a professional in school.

Detailed procedures to follow are outlined in All Wales Child Protection Procedures 2008, Section 4. The school also has regard to the guidance contained in the national publication "Disciplinary and dismissal procedures for school staff" Ref 002/2020.

Responsibilities are outlined in *Safeguarding Children: Working together under the Children Act 2004* – Welsh Government 2007. See also 5.2 *v Safeguarding Children in Education Handling Allegations* and 3.38 *Keeping Learners Safe*.



**APPENDIX E
DEALING WITH A CHILD'S DISCLOSURE OR CONCERNS**

This flowchart should be used as a brief checklist of procedure in the event of a concern about a child.

