



**St David's College**

— Est. 1965 —

**SAFEGUARDING AND CHILD  
PROTECTION POLICY**

## Safeguarding and Child Protection

Date	Review Date	Monitoring	Coordinator	Nominated Governor
15/01/25	15/01/26	Termly to Ed com	Sue Davies	Mr Ken Underhill

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## Safeguarding contacts

The following are very important telephone numbers that must be kept up to date at all times:

Safeguarding Contacts	Name	Mobile No.	Email.
<b>Designated Safeguarding Person</b>	Mrs Sue Davies	07498 501276	sdavies@stdavidscollege.co.uk
<b>Designated Safeguarding Person</b>	Mrs Hannah McGreevy	07956 576367	hmcgreevy@stdavidscollege.co.uk
<b>Deputy Designated Safeguarding Person</b>	Mrs Gabriella Murphy	GSE room	gmurphy@stdavidscollege.co.uk
<b>Deputy Designated Safeguarding Person</b>	Mrs Sarah Mountford	07534 581088	Smountford@stdavidscollege.co.uk
<b>Deputy Designated Safeguarding Person</b>	Dr Rob Hughes	07956 576373	rhughes@stdavidscollege.co.uk
<b>Deputy Designated Safeguarding Person</b>	Ross Williams	PE block	rwilliams@stdavidscollege.co.uk

<b>Nominated Governor for Safeguarding</b>	Mr Ken Underhill		safeguarding.governor@stdavidscollege.co.uk
<b>Independent Safeguarding Review Officer (ISRO)</b>		01492 575111	
<b>Social Services Referrals – Conwy County Borough Council</b>		01492 575111	
<b>Out of Hours Social Services – Conwy County Borough</b>		0300 123 3079	
<b>Police</b>		999 or 101	
<b>North Wales Safeguarding Board</b>		01824 712903	regionalsafeguarding@denbighshire.gov.uk
<b>Chair of Governors: Person to contact regarding concerns about the Headteacher</b>	Mr Pete Gaskell		chair.of.governors@stdavidscollege.co.uk
<b>NSPCC Whistle-blowing Helpline</b>	0800 028 0285		

We believe this policy should be a working document that is fit for purpose, represents the school ethos, enables consistency and quality across the school and is related to the following legislation:

Children Act 1989  
 Education Act 2002  
 Female Genital Mutilation Act 2003  
 Sexual Offences Act 2003  
 Children Act 2004  
 Safeguarding Vulnerable Groups Act 2006  
 Education and Inspections Act 2006  
 Children and Young Persons Act 2008  
 Childcare (Disqualification) Regulations 2009  
 Police Act 1997 (Criminal Records) (No. 2) Regulations 2009  
 The Staffing of Maintained Schools (Wales) (Amendment) Regulations 2009  
 Equality Act 2010  
 Education Act 2011  
 Protection of Freedoms Act 2012  
 Counter Terrorism and Security Act 2015  
 Serious Crime Act 2015  
 Data Protection Act 2018  
 United Kingdom General Data Protection Regulation  
 Wales Safeguarding Procedures 2019  
 Social Services and Wellbeing (Wales) Act 2014  
 Wellbeing of future Generations (Wales) Act 2015  
 Keeping Learners Safe: the role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002 (Welsh Government March 2022)

The following documentation is also related to this policy:

Information Sharing 2019 (Welsh Government)

Welsh Government “Statutory guidance to help prevent children and young people from missing education” March 2017

What to do if you’re worried a child is being abused 2019 (Welsh Government)

Inspecting Safeguarding in Early Years, Education and Skills Settings (Estyn)

School Inspection Handbook (Estyn)

Prevent Duty Guidance for England and Wales March 2024

Mandatory Reporting of Female Genital Mutilation - procedural information (Welsh Government)

Guidance for safer working practices (Safer Recruitment Consortium 2019)

Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)

Working together to safeguard people guidance (Welsh Government 2022)

Rights of Children and Young Persons (Wales) Measure 2011

The National Minimum Standards for Boarding Schools (2003)

The Independent School Standards (Wales) 2024

Welsh Assembly Government Circular 158/2015 – Safeguarding Children in Education: The role of local authorities and governing bodies under the Education Act 2002

Sexting in Schools and Colleges (UK Council for Child Internet Safety (UKCCIS)

Welsh Government’s Sharing Information to Safeguard Children November 2019

## Policy Statement

We believe Safeguarding is the policies and practices that we employ to keep children safe and promote their well-being. Safeguarding includes governance; security of the school buildings and grounds; safe recruitment of staff; SEN and inclusion; e-safety; health and safety; curriculum; attendance and punctuality; and all school policies.

We believe Child Protection is the activity that is undertaken to protect children who are suffering or likely to suffer significant harm.

We are committed to safeguarding and promoting the welfare of all children and take account of the information contained in the documents and policies listed above. The safety and protection of children is of paramount importance to everyone in this school and we work hard to create a culture of vigilance. At all times we will ensure what is best in the interests of all children.

**Safeguarding and promoting the welfare of children** is best defined as:

‘preventing and protecting children from abuse, neglect or other kinds of harm, and educating those around them to recognize the signs of dangers’  
(Keeping Learners Safe March 2022)

We believe that all children have the right to be safe in our society. Therefore, we recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of children by creating a positive school atmosphere through our teaching and

learning, pastoral support and care for both pupils and school personnel, training for school personnel and with working with parents. We teach all our children about safeguarding.

We understand that 'safeguarding is what we do for all children, whilst child protection refers to the procedures we use for children at risk of significant harm or who have been harmed.'

We work hard to ensure that everyone keeps careful watch throughout the school and in everything we do for possible dangers or difficulties. We want all children to feel safe at all times. We want to hear their views of how we can improve all aspects of safeguarding and from the evidence gained we put into place all necessary improvements.

We are particularly alert to the potential need for **early help** for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

We want all our children to achieve their full potential by:

- being as physically and mentally healthy as possible;
- experiencing good quality education opportunities;
- living in a safe environment;
- learning and working in a safe environment;
- experiencing emotional wellbeing;
- feeling loved and valued;
- receiving support from a network of reliable and affectionate relationships;
- learning to look after themselves;
- coping with everyday living;
- having a sense of identity and a positive image of themselves;
- developing their confidence and their interpersonal skills

We recognise that the safety and protection of pupils is the responsibility of all school personnel and volunteers as they are in a unique position to notice injuries, marks or bruises when children are undertaking certain activities which might indicate a child has been abused. We believe that we must report and investigate all injuries for the safety and protection of the children in our care.

## Designated Safeguarding Lead

### Designated Safeguarding Person (DSP) and Deputy Designated Safeguarding Persons (DDSP)

The School has two DSP's; Mrs Sue Davies who is a member of the senior leadership team and Mrs Hannah McGreevy who is one of the school nurse's and a Registered Pediatric Nurse. The Deputy Designated Safeguarding Person's are Mrs Gabriella Murphy, Mrs Sarah Mountford, Mr Ross Williams and Dr Rob Hughes. The DSP and DDSP contact details can be found on the Key Contacts page at the start of this policy.

The DSP's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSP's responsibility is as follows

- provide support to staff members to carry out their safeguarding duties;
- maintain an overview of safeguarding within the School;
- be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection (except where an allegation of abuse involves a member of staff);
- co-ordinate the child protection and safeguarding procedures in the School, and will ensure sufficient account of the nature, age range of the school and its pupils;
- manage referrals of all cases of suspected abuse to Conwy Local Authority and other external agencies, such as the Disclosure and Barring Service and Police, as appropriate;
- maintain an ongoing training programme for all School employees from induction and throughout their employment;
- monitor the keeping, confidentiality and storage of records in relation to child protection;
- liaise closely with the ISRO (Independent Safeguarding Review Officer) and other external agencies as appropriate;
- liaise with the Headteacher to inform him of issues such as ongoing police or safeguarding investigations (unless the allegation involves the Headteacher)
- discuss any potential safeguarding issues in line with Conwy procedures;
- keep parents informed of action to be taken under these procedures in relation to their child;
- monitor records of pupils in the School who are subject to a child protection plan to ensure that this is maintained and updated as notification is received;
- liaise with other professionals to ensure that children who are subject to child protection plans are monitored;
- where appropriate, to take part in the child protection conferences or reviews/core groups;
- inform the Children's Social Care Department in writing when a child who is subject to a child protection plan moves to another school and to inform the new school of the child protection plan as advised by the Children's Social Care department;
- monitor the effectiveness of the School's safeguarding policies and procedures;
- for any Looked-After child (including those previously Looked-After), ensure there is a designated member of staff with responsibility for their welfare and progress;
- ensure, together with the Headteacher and Governors, that all staff receive appropriate training to help them understand the risk of radicalisation and what to do if they have any

concerns that a child may be at risk of being drawn into terrorism, radicalisation and/or extremism ;

- keep and maintain records of staff training on child protection and safer recruitment procedures; and
- ensure that, where a child leaves the School, the child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file. Staff will ensure that a receipt or acknowledgement is obtained once the new school or college has come into possession of the records.

If the Designated Safeguarding Person is unavailable, all their duties will be carried out by a Deputy.

Full details of the DSP's role can be found in Chapter 2 of Keeping Learners Safe (283/2022). Ultimate lead responsibility for safeguarding and child protection remains with the DSP and this responsibility should not be delegated.

## Training

### **Recruitment of staff**

The School is committed to carrying out safer recruitment practice as detailed in the 'Safer Recruitment Policy'. DBS checks are carried out according to the guidance outlined in Keeping Learners Safe March 2022, depending on the role and duties of the applicant. Disqualification from working with children in childcare, is also adhered to – see 'Safer Recruitment Policy'. No member of staff or volunteer will start working alone before all safer recruitment checks have taken place including a barred list check. Staff are required to immediately inform the Headmaster of any circumstances on their suitability to work with children, including, but not limited to any convictions, charges or cautions for criminal offences. A failure to disclose such information, in accordance with this clause may be treated as a disciplinary matter and could lead to dismissal. The recruitment of Governors is the same as the recruitment of teaching staff – see safer recruitment policy.

### **Induction**

Every new member of staff, including temporary staff, volunteers, peripatetic music teachers, cleaning staff and sports coaches, is required to attend a training session on Safeguarding as part of their induction programme. All new employees of our catering firm are also given training in Safeguarding as are all PGCE students on placement.

The induction training will cover:

- the School's 'Child Protection and Safeguarding Policy' \* (includes safeguarding response to children missing from education, Prevent Duty, the role and identity of the DSP and Deputy DSP)
- the 'Staff Code of Conduct' \*
- the Pupil Behaviour Policy
- the 'Whistle Blowing Policy' \*
- Keeping Learners Safe March 2022 \*

- Missing Pupil Policy

\*copies to be given

All staff are asked to confirm in writing that they have read and understood the 'Safeguarding and Child Protection Policy', 'Staff Code of Conduct', 'Whistle Blowing Policy' and Keeping Learners Safe March 2022 and a record is kept on file. All governors are given the same suite of documents but do not need to undergo the same training unless they are working in regulated activity. In addition, all teaching and non-teaching staff are asked to complete a 20 minute on-line Prevent awareness course.

The only adults who work or visit the School who are exempt from this requirement are those not working in regulated activity and include: occasional visitors, including occasional speakers and contractors, who sign in and are given a security badge by our Receptionist, and who are escorted throughout their visit; and contractors working during School holidays or contractors working on a designated site that is physically separated from the rest of the School, who are required to sign in and out at their site office and to wear security badges at all times.

An annual in-house up-date Safeguarding training session takes place every September for all staff during which the annually revised 'Safeguarding and Child Protection Policy' is distributed. All Governors also have training every two years that is run by the DSP. All staff, including volunteers record that they have read and understand their respective responsibilities within the policy. Informal updates are given in response to government requirements. The DSP and Deputy DSP receive inter-agency training every two years and informal updates.

Staff should refer to the 'Staff Code of Conduct' which provides clear guidance about behaviour and actions so as not to place pupils or staff at risk of harm or allegations of harm to a pupil. Staff who are engaged in one-to-one teaching, must ensure that they take appropriate precautions. This will vary according to the type of teaching. These will include, but not be limited too, the following:

1. All staff should meet pupils on a one-to-one basis within the normal school hours. If staff need to meet pupils after the school day, make sure an appropriate adult knows where and when you will be alone with that child.
2. All staff should ensure that they are working in a room with a window in the door so that people can look in, or that the door is always wedged open if a pupil is present in the room.
3. Ensure the young person knows they can stop the one-to-one lesson at any time and make sure they know how to complain or get help if they need it.
4. The school understands that at times pupils become upset and need comfort. The school thereby recommends the use of the 'school-hug'. The school-hug is a sideways hug whereby the member of staff places their hand on the pupil's shoulder. This type of hug prevents the pupil from turning themselves towards the member of staff and thus engaging in a 'front' embrace, which the school would deem inappropriate. Should a pupil try to engage in any inappropriate physical contact, the member of staff must explain to the pupil why it is unacceptable.

Staff should seek advice from the Designated Safeguarding Person.

## Teaching pupils

Opportunities to teach Safeguarding are highlighted in both the GSE and RSE Schemes of Work and are taught as part of a broad and balanced curriculum. All classes from year 5 through to Yr11 have a RSE lesson once a week. RSE stands for Relationships and Sexuality Education, rather like PSHE, Personal Social Health Education. The RSE curriculum includes SRE teaching and so includes teaching children about reproduction, sexuality and sexual health. It does not promote early sexual activity or any particular sexual orientation. Briefly the curriculum covers for Year 5/6 pupils that they understand about body change and puberty and how a baby is born. At KS3 and beyond topics include; relationships, feelings, sexual identity and sexual orientation, puberty, menstruation, contraception and abortion, sexual health, mental health and wellbeing, online relationships, pornography, families, caring respectful relationships, consent, LGBT+. We believe that pupils should have high quality sex and relationships education so they can make wise and informed choices.

A programme of e-safety is carefully planned and delivered throughout the School. Every year, the school supports 'Internet Safety week' and highlights this by doing a whole school assembly and staff led discussions during tutor period.

All pupils are taught to report suspected and actual abuse and are regularly reminded who the DSPs are.

## Senior pupils

At St David's College prefects and other senior pupils have limited responsibility over other pupils. We believe however, that they can play an important role supporting staff and should know what appropriate action to take should they become aware of any concerns. The school supports their ability to do this by giving an appropriate level of training in safeguarding at the commencement of each year and at intervals.

## Definitions and Signs of Abuse

All staff should be aware of abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. It is important for staff to distinguish between 'actual' significant harm and the likelihood of significant harm. In effect, staff do not have to wait for an incident to occur if they believe a child might be significantly harmed in some way.

We acknowledge that children can be harmed physically, emotionally, sexually or by neglect. It is our duty to report any concerns that we have of child abuse as the health, safety and protection of all children is paramount. We are aware that if abuse is suspected by another child then child protection procedures will be applied to both children.

The following are types of abuse and neglect:

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an

institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

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

Some of the following signs may be indicators of physical abuse:

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained: bruises or cuts; burns or scalds; or bite marks.

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

Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

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

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

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and

- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some of the following signs may be indicators of neglect:

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

**Peer-on-Peer-Abuse:** There are different gender issues that can be prevalent when dealing with peer-on-peer abuse i.e. it is more likely for girls to be victims and boys perpetrators, but all types of peer-on-peer abuse is unacceptable and will be taken seriously as a safeguarding concern. The different forms of peer-on-peer abuse can include: sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, sexting (youth-produced sexual imagery), initiation / hazing type violence and rituals.

All staff are trained to manage a report of peer on peer sexual abuse as a safeguarding concern. When there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm due to a bullying incident, or abuse, the incident will be treated as a child protection concern. In the event of a disclosure about peer-on-peer abuse, it is important that all children involved, whether perpetrator or victim, are treated as being 'at risk'. Support will be provided to all pupils and procedures will be in place such as counselling and access to helplines. Staff should be constantly alert to signs of abuse to minimise the risk.

It is not the responsibility of School staff to decide whether child abuse is occurring, but we are required to act and report on any concerns. Staff and volunteers in School are particularly well placed to observe outward signs of abuse, changes in behaviour or failure to develop. Bruises, lacerations and burns may be apparent, particularly when children change their clothes for physical education and sports activities.

All staff and volunteers are also asked to watch out for signs of self-harm. Staff should also be vigilant and report any concerns they may have if a child threatens or tries to run away or goes missing for any period. Any pupil who repeatedly goes missing from School or has regular absence or has ten days of unexplained unauthorised absence, will be reported to Conwy Local Authority.

## Reporting

All staff must follow this policy and refer concerns of abuse, peer-on-peer, radicalisation or self-harm to the DSP immediately. They must:

- listen to the pupil, keeping calm and offering reassurance;
- never promise confidentiality - let the child know immediately that if they make a Safeguarding disclosure you must speak to the DSP; explain that anything they say will be treated sensitively and only those who need to know will be informed;
- observe and record bruises or self-harm where possible but should not ask a child to remove or adjust their clothing to observe them;
- allow the child to lead the discussion if a disclosure is made, but do not press for details by asking leading questions, e.g. 'what did they do next?';
- listen – do not investigate but use questions such as, 'Is there anything else you'd like to tell me?';
- not lay blame or criticise either the child or the perpetrator.

All staff must report immediately:

- any concerns that a child presents signs or symptoms of abuse or neglect;
- any disclosure or hints of abuse or neglect received from the child or from any other person;
- any concerns they may have regarding a person who may pose a risk to children.

Managing pupil information and referrals must always be conducted within a framework of confidentiality. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Staff should not assume a colleague or another professional will act and share information that might be critical in keeping learners safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Where a child is suffering, or is likely to suffer harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping learners safe. Where children leave the School, the DSPs ensure their child protection file is transferred to the new school or college as soon as possible. This is transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

## **Parent's Concerns**

Parents who have concerns about suspected abuse or neglect may also approach the Senior Designated Safeguarding Lead or pupil's Personal Tutor, Houseparent or the Headteacher who will ensure such concerns are dealt with in accordance with this policy. Parents should also make a referral directly to children's social care or the police where they have concerns that there is a risk of immediate serious harm.

## **Allegations against staff (including the Headteacher and Safeguarding Persons) and volunteers**

Every staff member has a responsibility to ensure safe working practices and that their behaviour and actions do not place pupils or staff at risk of harm or of allegations of harm to a pupil (see the Staff Code of Conduct for further information).

The School's procedures for dealing with allegations against any staff member (and volunteers who work with children) aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from vexatious allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. The School will liaise with the ISRO (Independent Safeguarding Review Officer), police and social services as to managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Headteacher and Safeguarding Leads) and volunteers follows Departmental guidance and apply when staff, including volunteers, have (or alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil;
- Possibly committed a criminal offence against or related to a pupil; or
- Behaved towards a pupil in a way that indicated that they would pose a risk of harm if they were to work regularly or closely with children.

Where an allegation or complaint is made against any member of staff, other than the Headteacher or volunteer, the matter should be reported immediately to the Headteacher, or in his absence, the Governor responsible for safeguarding but keeping the Headteacher informed. All concerns or allegations about a member of the governing body should be directed to the Governor responsible for safeguarding. The Headteacher (or Governor with responsibility for safeguarding) will then immediately, and in any event within one working day, inform the ISRO of all allegations which appear to meet the above criteria or that are made directly to the police. If, at any point, there is a risk of immediate serious harm, immediate intervention by social services and/or the police will be required. The Headteacher will discuss the matter with the ISRO and where necessary, the ISRO will obtain further details of the allegations and the circumstances in which the allegation was made. The School will act in accordance with advice given by the ISRO and will not investigate allegations or inform any individuals without the ISRO's consent. The Headteacher (or Governor with responsibility for safeguarding) will keep a written record of discussions with the ISRO. Allegations against a member of staff who is no longer at the School (including historical allegations) should be referred to the Police.

The School recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.

### **Allegations against the Headteacher**

Where an allegation or complaint is made against the Headteacher or the DSPs, the person receiving the allegation should immediately inform the Chair of Governors without first notifying the Headteacher or DSPs. Any such allegation will be discussed with the ISRO before further action is taken.

### **Allegations against the Chairman and Governors**

Where an allegation or concern is made against a Governor (including the Chair of Governors), the person receiving the allegation should immediately inform the Headteacher without first notifying the person subject of the allegation or concern. Any such allegation will be discussed with the ISRO before action is taken.

### **Suspension**

Suspension will not be an automatic response to an allegation but will be considered where the circumstances warrant it. Where suspension is being considered, the ISRO should be consulted so that full consideration can be given to all the options, subject to the need to ensure

- the safety and welfare of the pupils or pupil concerned; and
- the need for a full and fair investigation.

If suspension is deemed appropriate, the reasons and justifications will be recorded by the School and the individual will be notified of the reasons usually within one working day. If a member of boarding staff is suspended pending a child protection investigation, the School will make arrangements for alternative accommodation outside the school, away from children until the allegation or concern is resolved.

### **Resignation**

If a member of staff (or a Governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the DBS and to Secretary of State in appropriate circumstances. The School will never enter into settlement agreements with a member of staff when an allegation has been made, regardless of whether a member of staff cooperates or refuses to cooperate with an investigation

### **Whistleblowing**

Please refer to the School's Whistleblowing Policy which can be found in the School Handbook. All staff are required to report to the Headteacher, or the nominated School Safeguarding Governor in the Headteacher's absence, any concern or allegations about School safeguarding practices (including concerns about poor or unsafe practice and potential failings in the School's safeguarding regime) or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Staff have the choice of which Designated Safeguarding Lead to contact or can choose to contact Conwy Social Services or the NSPCC whistleblowing helpline.

## Other areas of safeguarding

### Boarding

St David's College acknowledges that there is potential for greater risk for abuse because it is a Boarding School and staff should be alert to pupil relationships and the potential for peer abuse.

### Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (ALN) can face additional safeguarding challenges. The School recognises that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- children with ALN can be disproportionately impacted by things like bullying without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

### Preventing Radicalisation

Staff are asked to keep an awareness of the potential for radicalisation of pupils using the internet and the use of social media. Normal referral processes should be followed when there are concerns about children who may be at risk of being drawn into terrorism and staff should be alert to changes in children's behaviour.

### Child Missing from Education

A child missing from education is a potential indicator of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of Female Genital Mutilation (FGM) or risk of forced marriage. St David's College staff will follow the School's procedures for dealing with children that go missing from education, particularly on repeat occasions

### Honour Based Violence

So-called 'honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and /or community, including FGM, forced marriage and practices such as breast ironing. Abuse committed in the context of "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSP.

Since October 2015 it is mandatory for staff to report to the police, cases where they discover that an act of FGM appears to have been carried out (those failing to report cases will face disciplinary sanctions). Unless the member of staff has good reason not to, she/he should still consider and discuss such a case with the DSP and if appropriate, involve children's social care to ensure that girls are fully supported sensitively throughout any investigation.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

### **Child Sexual Exploitation**

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

### **Sexual violence and sexual harassment between children in schools**

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 be likely to adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem reporting sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report

### **Domestic Abuse**

The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological
- physical

- sexual
- financial
- emotional

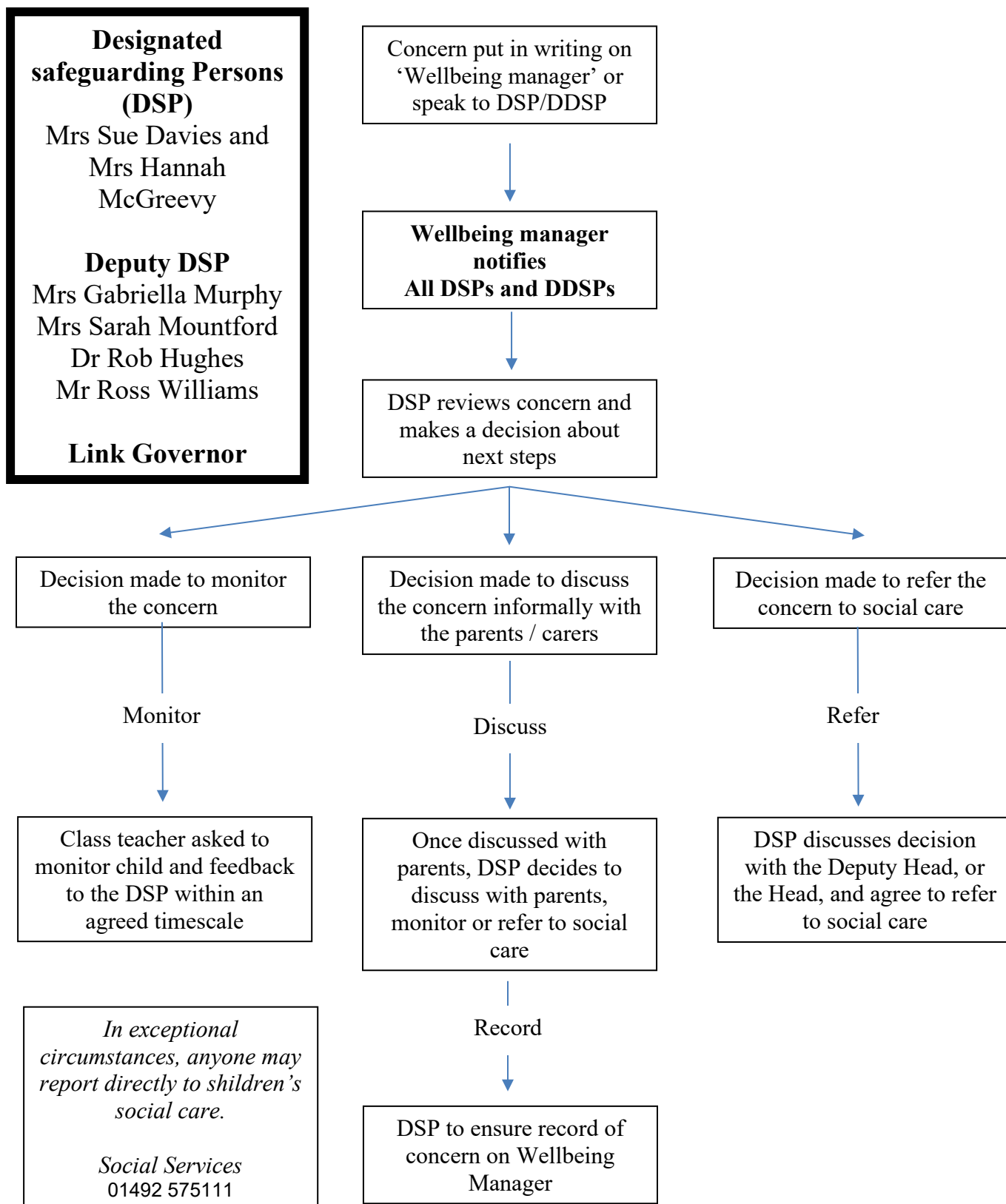
Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on a child. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

### **Other Specific Forms of Abuse**

The following are other specific areas of abuse and more information can be found in specific guidance prepared by the Welsh Government as set out on page 39 and 40 of Keeping Learners Safe

- Harmful practices relating to tradition, culture, religion and superstition
- Child criminal exploitation: county lines
- Harmful sexual behaviour
- Unaccompanied asylum seeking children

## Flowchart for raising a safeguarding concern



# Equality

Under the Equality Act 2010, St. David's has a duty not to discriminate against any of the protected characteristics. Due regard has been given to equality law when developing and implementing St David's policies, practices and day-to-day activities. St David's will continually monitor the way this policy operates to ensure it does not unlawfully discriminate, permit harassment or victimisation, or limit equality of opportunity. St David's is committed to meeting its obligations under the Equality Act 2010 at all times.

## Focus on sexual abuse and harassment

The risks to the welfare and wellbeing of children and young people can take many forms which we address in Safeguarding and Child Protection policy. However, recent reports have demonstrated that sexual abuse, violence and harassment are at an unacceptable level and we are committed to ensuring that our established procedures clearly support pupils who may be targeted or fall victim to such conduct. It has led to these matters being given the spotlight they deserve through the 'Everyone's Invited' movement.

In this focus, we will highlight what we mean by sexual abuse and harassment and how we will ensure our children, young people, staff and wider school community understand what it is and how they can raise concerns about such behaviour.

We will never accept sexual harassment or violence. We will endeavour to work with victims and wider safeguarding partners to take action to stop it.

Teachers and others working in schools are in positions of trust so it is vital that we play a part in supporting those who may have been subjected to sexual harassment or violence, but also that we do not do anything which would undermine our own duty to safeguard and promote the welfare of those children and young people in our care.

### **Sexual Harassment**

Sexual harassment is unwanted conduct of a sexual nature. It can apply to anyone regardless of their identified sex, gender or sexual orientation. It can include:

- comments such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- jokes of a sexual nature or taunting somebody in a sexual way;
- engaging in unwanted behaviour such as deliberately brushing against someone, interfering with someone's clothes or displaying pictures, photos or drawings of a sexual nature;

- online sexual harassment by sharing sexual images and videos without consent, messages of a sexualised nature, bullying comments, comments on social media platforms or being exploited in a sexualised way with coercion or threats against the person.

## **Sexual violence**

Sexual violence includes the offences which are created under the law to deter and hold accountable those who engage in prohibited activity. They are some of the most serious acts which our society has put in measures to address. We want to be clear here with everybody what these acts of sexual violence are and to be able to enable you to recognise when you should raise these with a trusted adult:

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

## **Consent**

Consent is a fundamental part of understanding sexual harassment and violence. We want to be clear here what consent is so it may be understood whether sexual harassment or violence has taken place.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. In addition, you may wish to participate in some conversations but not those of a sexual or sexualised nature.

Consent can be withdrawn at any time. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.

It is important to highlight here that the law governs when someone can give consent. You are deemed able to give consent only from the age of 16.

Who can engage in sexual harassment or violence

Anyone can engage in sexual harassment or violence including fellow pupils, students and adults.

If you feel that you are being, or have been, subjected to sexual harassment or violence you should feel able and safe to speak with a trusted adult here at school.

If you want to speak, we are here to listen and help. At school, you have the following ways in which you can speak about your experiences and be heard:

- Speak to a trusted adult such as form tutor, teacher, Head of Year, Housemaster, Pastoral Officer, Assistant Head, Headmaster.
- Speak to an older pupil whom you trust such as Head boy/girl, House captain or prefect.
- Contact any of the above using Teams messenger or school email.
- Text or call Pastoral Officer, Housemaster, Assistant Head, Deputy Head or Headmaster on their work phone.

## **Awareness**

We will work with our school community to raise awareness of unacceptable and unwanted conduct, violence and the importance of consent. We will do this by:

- Delivering a RSE programme that tackles the issues in an age appropriate manner.
- Inviting our local School Police Liaison Officer to come into school to give age appropriate talks.
- Ensuring continuous reminders of who a pupil can speak to via form times, assemblies, and posters around schools
- Inviting annual speakers in from external companies such as The Rap Project to give age appropriate talks.
- Delivering regular assemblies within year groups tackling these issues.
- Encouraging a culture of respect to all.
- Ensuring that all staff are aware of what sexual abuse, violence and harassment is in legal terms and how school intends on tackling these issues.
- Ensuring that all staff and governors have regular training on VAWDASV.
- Completing a thorough safeguarding audit to establish any gaps or any updates to be made.
- Ensuring full support and input of Governors.

## **Child protection Policy Endorsement for Staff**

I have read the child protection policy and understand my professional requirements.

Signed.....

Date.....