

Safeguarding Policy A6 (ISI reference 7a)

Responsibility

In School:

Designated Safeguarding Lead:	Lars Fox (Senior Deputy) Tel: 01904 727612/ 01904 728 224 lfox@queenmargarets.com
Deputy D S Ls:	Tania Davidson (Director of Boarding) Tel: 01904 727620/727658 tdavidson@queenmargarets.com
	Jackie Whay (Deputy Director of Boarding) Tel: 01904 727593 jwhay@queenmargarets.com
	Jessica Miles (Head) Tel: 01904 727611/07837822581 jmiles@queenmargarets.com

On the Board of Governors:

Nominated Safeguarding and Prevent Governor: Mrs Sue King 0113 204 5708

Usually, the DSL or the Deputy will be the first point of contact for any Safeguarding concern. However, this does not preclude a member of staff making a referral to outside agencies if necessary:

Contact details for outside agencies

Local Authorities

North Yorkshire Safeguarding Children Board: <http://www.safeguardingchildren.co.uk/aboutus/contact-us>

Duty Designated Officer for Selby District: - 01609 532477

Deputy Local Authority Designated Officer (LADO): 01609 532477

Customer Services Centre. (If your concern is outside normal office hours, you should contact the emergency duty team for North Yorkshire):

During Office Hours: By Phone: 01609 780780 Email: social.care@northyorks.gov.uk

Outside Office Hours: Emergency Duty Team (for evenings, weekends and bank holidays): 01609 780780

Alternatively, the City of York Safeguarding Children's Board (CYSCB) childrensfrontdoor@york.gov.uk.

The telephone contact in York is: 01904 551900; out of hours 0845 0349417.)

General Information

Working Together to Safeguard Children website:

http://www.workingtogetheronline.co.uk/chapters/chapter_one.html

Common Assessment Framework (CAF) for children in need:

http://www.northyorks.gov.uk/media/2668/Common-assessment-framework---information-for-parents-and-carers/pdf/CAF_Leaflet_PC.pdf

Non-emergency or local Police Helpline: 101

Department for Education dedicated telephone helpline and mailbox for non-emergency advice for staff and governors:
020 7340 7264

Prevent Strategy

In the first instance, ring 101- non-emergency Police Helpline or access the following webpage for details:

<http://www.safeguardingchildren.co.uk/prevent-practice-guidance?v=preview>

Confidential Anti-Terrorism Helpline: 0800 789 321

counter-extremism@education.gsi.gov.uk

<http://www.preventtragedies.co.uk/>

<https://www.gov.uk/report-terrorism>

Forced Marriage

Forced Marriage Unit: 020 7008 0151

fm@fco.gov.uk

Mandatory Reporting of FGM

Since 2015, it has been mandatory for teachers to report to the police cases when they discover that an act of FGM appears to have been carried out. Unless the teacher has good reasons not to do so, they should still consider and discuss such a case with the DSL and involve Children's Social Care as appropriate,

Ring 999 in the first instance

NSPCC FGM Hotline: 0800 028 3550.

Procedures

www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Note: This policy is made available to Parents via the School Website and hard copies will be supplied on request.

Policy A6: Arrangements for Safeguarding

Child Protection Policy

This policy has been written in line with Standard 11 (Child Protection) of the National Minimum Standards (NMS) for Boarding Schools (April 2015). The School will safeguard and promote the welfare of girls in the School in accordance with Section 157 of the Education Act 2002 and in compliance with the statutory guidance *Keeping Children Safe in Education* (September 2018). This policy is consistent with and has been compiled with reference to North Yorkshire Safeguarding Children Board's Guidelines and Procedures. The Policy is intended to ensure that the School contributes to interagency working in line with "Working Together to Safeguard Children" July 2018, (HM Government's guide to inter-agency working to safeguard and promote the welfare of children).

In acknowledgement that the current threat from terrorism and extremism is real and severe and can involve the exploitation of vulnerable people, children and young people, including girls at the School the School maintains a dedicated policy to address the issue of tackling extremism and radicalisation (Policy C8: Tackling Extremism and Radicalisation (Prevent) Policy) which should be read together with this policy and forms a subset of it.

The policy covers:

- 2.1. Aims and Objectives
- 2.2. Responsibility
- 2.3. The Designated Safeguarding Lead (DSL) and Board Responsibility
- 2.4. Induction and training
- 2.5. Staff Code of Conduct
- 2.6. Procedures where abuse of a girl is suspected
- 2.7. Procedures when an allegation is made against a member of staff
- 2.8. Girls' awareness
- 2.9. Staff Recruitment
- 2.10. Volunteers
- 2.11 Children who have suffered/ likely to have suffered serious harm and children in need
- 2.12. Definition and symptoms of Child Abuse
- 2.13. Female Genital Mutilation (FGM)
- 2.14 Forced Marriage
- 2.15 Radicalisation and Extremism
- 2.16 Girls Missing from Education
- 2.17. Child Sexual Exploitation
- 2.18. Remedying defects in these Safeguarding arrangements
- 2.19 Complaints Procedure
- 2.20 Other sources of information

NMS Standard 11: Child Protection

11. The school ensures that:
- arrangements are made to safeguard and promote the welfare of pupils at the school; and
 - such arrangements have regard to any guidance issued by the Secretary of State

All staff should be familiar with the following policies and documents, which have an integral role in effective safeguarding in Queen Margaret's (QM) and should be read in conjunction with this policy:

- Policy A4: Behaviour (Girls)
- Policy A8: Countering Bullying
- Policy B4: Discipline (staff)
- Policy B7: Security & Access
- Policy B8: Pupil Access to Risky Areas
- Policy B10: Pupil access to a person independent of the School Staff Group
- Policy B17: Concerns (girls)
- Policy C4: E-Communications
- Policy C5: Images of Girls
- Policy C8 Tackling Extremism and Radicalisation (Prevent) Policy
- Policy C36: Recruitment (staff, volunteers and supply staff)
- Visiting Speakers Policy

2.1. Aims & Objectives

Queen Margaret's is committed to Safeguarding, child protection and promoting the welfare of all girls, regardless of age, special needs or disability, racial/cultural heritage, religious belief or sexual orientation. It is of paramount importance that the girls at QM feel safe, secure and free from any form of abuse. The school is committed to the protection and promotion of the girls' welfare and providing an environment in which they may thrive. This Child Protection and Safeguarding Policy forms a fundamental part of our approach to providing excellent Pastoral Care for all girls.

2.2 Responsibility

All school employees, whatever their role in the School, have a responsibility to protect girls from bullying, physical, sexual or emotional abuse and/or neglect and to report any suspicion of abuse of a girl at the school whether the alleged abuse is at school, at home or outside the school. Any report should be made to the DSL. Confidentiality is guaranteed to any member of staff who reports suspicions of a colleague or other person on site or otherwise who has contact with QM girls. The School's Whistleblowing Policy in Policy B4 reinforces that protection.

All School employees have a responsibility to attend child protection training when requested to do so and to familiarise themselves with this policy and its associated policies.

2.3 The Designated Safeguarding Lead and Board responsibility

The Designated Safeguarding Lead (DSL) for QM appointed by the Board of Governors is the Senior Deputy Head, Lars Fox; his telephone number is on the first page of this policy. He is supported by the Deputy Designated Safeguarding Leads Tania Davidson, Jessica Miles and Jackie Whay, whose telephone numbers are also there. As senior colleagues they take part in strategic discussions and attend inter-agency meetings as necessary. Liaison with the North Yorkshire Safeguarding Children Board (NYSCB) and the Family Services Department is their responsibility. ***However, as Keeping Children Safe in Education (September 2018) asserts, any member of staff may make a referral to Child Social Care if necessary.***

The main responsibilities of the DSL are;

- To be the first point of contact for parents, girls staff and outside agencies on all issues concerning safeguarding
- To co-ordinate the safeguarding procedures as well as regular staff training in the School
- To promote and maintain a positive awareness of safeguarding for all School employees through training and other means, including defining the distinctions between Children in Need (s17) and Children at Risk (s47), and the necessity of Early Help strategies and local Early Help processes
- To ensure that the Deputy DSLs have at least the same level of Safeguarding training as the DSL
- To be responsible for the maintenance, confidentiality and storage of records in relation to safeguarding
- To liaise as necessary with the North Yorkshire Safeguarding Children Board and/or the City of York Safeguarding Children Board
- To take lead responsibility for online safety (as per post holder's job description)
- To provide guidance to all staff on how to respond and manage reports of sexual violence or harassment
- To advise the Head on any perceived risk of harm to pupils
- To apprise the Governors on how members of staff may contribute to the Safeguarding Policy at Queen Margaret's School and to actively encourage members of staff to do so

Mrs Kate Preston is the nominated Governor for Safeguarding and the Prevent Strategy. She will retire from the Board in December 2018 when she will be succeeded by Mrs Sue King. Both sit as a member of the Governors' Pastoral Committee and as members of the Full Board. Their role is to liaise with the DSL on Safeguarding matters. The Board then receives and considers the information in order to discharge its corporate responsibility. Kate Preston is also the nominated person responsible for liaising with the Local Authority and/or partner agencies in the event of allegations of abuse being made against the Head. She will be succeeded in that role by Mrs Sue King.

The role of The Board is to take leadership responsibility for Queen Margaret's safeguarding arrangements. The Board will ensure that the DSL and his Deputies have the appropriate authority and the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters; to take part in strategy discussions and interagency meetings and/or to support other staff to do so and to contribute to the assessment of children. The Board will ensure that the School has written recruitment and selection policies and procedures in place that secure the full and effective delivery of Safer Recruitment standards.

The DSL submits a report on Safeguarding to the Governors' Pastoral Committee termly, outlining (anonymised appropriately) the current pastoral concerns in the School and how they are being managed.

The Board of Governors receives and considers a report on Safeguarding at each of its Board meetings and formally considers Safeguarding and Child Protection issues once a year; it is responsible for carrying out a review of the School's Child Protection policies and a review of the procedures that the School has in place and the implementation of those procedures. This policy will be reviewed annually and submitted by the Pastoral Committee of the Board to the Full Board for discussion and approval at its meeting in the Autumn Term.

Amendments necessitated by changes of personnel or changes in legislation or guidance will be made as often as necessary and reported to the Pastoral Committee.

2.4. Induction and Training

The DSL keeps up to date with safeguarding issues by attending training and conferences both locally and nationally. The DSL and Deputies update their training on safeguarding and inter-agency working every two years, and records are kept of all training completed.

All members of staff are given hard copies of the latest versions (September 2018) of Part One and Annex A of the statutory guidance *Keeping Children Safe in Education*. They are required to sign and return receipts to acknowledge that they have read the documents and the receipts are kept on file. All staff receive appropriate Child Protection training which is regularly monitored, updated and logged. Staff are further trained in the prevention of FGM and Forced Marriage and, in line with the Schools Prevent Policy, complete the Channel Awareness online course:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

The DSL provides regular refresher training for teaching and boarding staff, as well as more detailed training every three years for all staff, records of which are kept. In addition, the DSL also provides regular, logged Safeguarding updates, as and when required, throughout the course of the school year, usually during training days. Further, the Director of Boarding gives training to girls on the aspects of Safeguarding and Active Listening at the start of the academic year. All new members of staff must be made familiar with the QM Behaviour Policy (A4) and our Children Missing from Education procedures- see below.

All prefects and senior girls with positions of responsibility are given Safeguarding and Prevent Strategy training as part of their induction programme.

Before starting employment at Queen Margaret's, all new members of staff (including temporary staff or volunteers) are required to attend a safeguarding interview with the DSL who will make them aware of the provisions of this policy. The DSL also provides induction training for new staff on:

- Policy A6: Safeguarding
- Policy B4 Discipline (Staff), including the staff code of conduct/ whistleblowing/ acceptable use if IT
- Policy C8: Tackling Extremism and Radicalisation (Prevent) Policy and Channel Prevent Awareness-see above
- Part One and Annex A of the statutory guidance *Keeping Children Safe in Education*
- Girls Missing in Education- see below
- The identity and the role of the Designated Safeguarding Lead and Deputies

2.5. The Staff Code of Conduct

The staff code of conduct (see Policy B4 Staff Disciplinary, Grievance and Whistleblowing Policy incorporating the Staff Code of Conduct) provides guidance to all members of staff on interaction with girls. Having been provided with that guidance, failure to adhere to it will be regarded as a serious breach of discipline that may, in appropriate circumstances, result in summary dismissal.

2.6 Procedures where abuse of a girl is suspected

If a girl causes you to suspect that she has been the subject of abuse or discloses to you that she has been abused, whether that be by a parent, carer, School employee, another girl or girls or anyone at all

- Find time **immediately** to listen to the child making a disclosure of abuse.
- Write brief notes of exactly what you are told at the time and/or what has caused your suspicion and keep these original notes. You should then write a detailed report on the conversation. You should note the time and date on all notes made. Provide these notes to the DSL.
- Do not promise confidentiality; reassure the child that only those who need to know will be informed.
- Do not ask a girl to repeat the disclosure to another person.
- Do not ask leading questions and do not attempt to carry out your own investigation. You may compromise any subsequent police investigation.
- If the suspicion concerns abuse by one or more girls of another girl, when there is reasonable cause to suspect that she is suffering or is likely to suffer significant harm, such abuse should be reported and will be dealt with under the procedures set out in this policy in the expectation that all girls involved, whether perceived perpetrator or victim, shall be treated as being at risk. The School may discuss such issues, when there is reasonable cause to suspect that a girl is suffering, or is likely to suffer significant harm (whether as victim or perpetrator) with a Team Manager in Children's Social Care.
- It is your responsibility to inform the DSL immediately of any suspicion, (of whatever perceived severity). If he is not available, then you must inform the Head. **You may, if you think it right to do so, report the matter direct to the Local Safeguarding Children Board.**
- QM falls under the remit of the North Yorkshire Safeguarding Children Board. In the case of suspected abuse where someone other than a member of staff is suspected, the DSL will contact the Local Authority Children and Young People's Service, Children's Social Care. A Case Worker will provide immediate guidance; the matter will be dealt with under the Child Protection Procedures maintained by the Safeguarding Children Boards.
- Colleagues are advised to maintain an attitude that "it could happen here" where safeguarding is concerned.
- When concerned about a girl's welfare, members of staff should always act in the interests of the child.
- School Safeguarding Records are confidential and access is limited to a 'need to know' basis.

Therefore, if you suspect abuse:

- Report the information to the DSL on the same day. If the allegation implicates the DSL or another member of staff, then the report should be made to the Head- see below. **If there is a risk of serious harm to a child, anyone can make a referral** to the Local Authority Children and Young People's Service or the City of York Safeguarding Children's Board immediately. If a child's situation does not appear to be improving, the member of staff should press for re-consideration.
- Do not attempt to investigate the report or suspicion yourself. There is a danger that you may compromise any further investigation by the police.

2.7. Procedures where an allegation is made against a member of staff

If an allegation is made against a member of staff this must be processed immediately. Allegations should be referred to the Head. If the Head is implicated, the Chair of Governors and/ or Nominated Safeguarding Governor should be informed immediately without informing the Head. All matters must be referred to the LADO (Local Authority Designated Officer) on the same day for advice on how the matter should be handled, and in the most serious cases, the Police consulted. School will not initiate any investigation prior to referral to and only in consultation with the LADO.

QM falls under the remit of the North Yorkshire Safeguarding Children Board. Susan Crawford is the LADO (Local Authority Designated Officer) for the Selby district of North Yorkshire under which QM falls and she can be contacted directly on **01609 532477**.

Early consideration will be given in discussion with the LADO as to the nature, content and context of the allegation and a course of action agreed, which may include any involvement of the Police. A record will be made of those discussions and the terms of communications with both the staff member and the girl's parents agreed.

Giving full weight to the advice of the LADO, a decision will be made about whether to suspend the member of staff or whether alternative arrangements should be put in place.

If a member of staff is suspended pending the investigation of a Child Protection matter he/she will be required, for the duration of that investigation, to live in accommodation away from girls and if this requires the member of staff to live outside the boundary of the School premises and he or she has no convenient accommodation of his/her own the School

will meet the cost of providing that accommodation, reserving the right to seek recovery of that expense if the allegations are admitted or proved and justify dismissal.

There are restrictions on the reporting or publishing of allegations against teachers (in force since 01 October 2012). All possible efforts will be made to maintain confidentiality, and, up to the point where the staff member is charged with an offence, or there is information published about the investigation or a decision by a regulatory body, the School will make no communication about the allegation.

The School will, in cases where a teacher has been dismissed (or would have been had he/she not resigned) make a referral to the Teacher Regulation Agency, which replaced the National College for Teaching and Leadership in April 2018.

The School will comply with its statutory duty to refer to the Disclosure and Barring Service an individual where the School considers that there is a risk that he or she has caused harm or poses a risk of harm to children. That referral will be made as soon as possible and, in any event, within one month of the School's ceasing to use the individual's services because he or she has been considered unsuitable to work with children. Ceasing to use services may be as a result of dismissal, resignation, and non-renewal of a fixed term contract or any other change in circumstances that results in the relationship between the School and the individual being brought to an end.

2.8. Girls' Awareness

QM's Concerns Policy (Policy B17) and Confidentiality Policy (Policy C3) are available to supplement the supportive pastoral system which includes the Centre for Health and Wellbeing; Wellbeing Practitioner; Clinical Psychologist; a resident Chaplain, plus House Staff, Tutors and Senior Tutors. Important contact details are published in the girls' planners, including the Child Line number and the contact details for the Children's Rights Director and these are also contained in the Concerns Policy, which is displayed prominently in the Boarding Houses. The Countering Bullying Policy (Policy A8) provides girls with clear guidance as to what is not acceptable behaviour on the part of their fellow students and sets out procedures whereby abuse by one or more girls against another girl will be identified, can be reported and will be dealt with. ***It should be recognised by staff and girls that whilst any incident of alleged bullying is always treated very seriously, certain sorts of bullying can amount to pupil-on-pupil abuse. Here, the recognised threshold for the distinction is that the bullying is causing risk of serious harm- see 2.11 below.***

2.9. Staff Recruitment

All members of staff appointed to QM who will be in regulated activity are required to have an enhanced DBS check and are recruited under a policy that complies with the Independent School Standards Regulations. The QM Recruitment Policy (Policy C36) must be adhered to and has been written to ensure compliance with *Keeping Children Safe in Education*. ***Before supply staff or agency staff are permitted to start work, the recruitment checklist (Appendix B in Policy C36 Recruitment) must be completed and checked by the Clerk or Bursar and any supplementary checks required carried out.***

2.10. Volunteers

In compliance with *Keeping Children Safe in Education*, QM operates a pre-recruitment checking policy for volunteers. A risk assessment as to whether or not an Enhanced DBS check needs to be made for each volunteer must be made by the Clerk to the Governors and no volunteer may participate in any School activity until that decision has been made, and a record made of it in the volunteer's section of the School's Central Register by the Clerk.

In the event that the proposed volunteer is a person about whom little is known the pre-appointment checks for staff set out in Recruitment policy C36 must be followed in full. No volunteer may have contact with girls whether on a supervised or unsupervised manner until the Head has confirmed that appropriate checks and enquiries have been made and the Clerk has confirmed that the Single Central Register entries have been made. In other circumstances, where the DSL can be assured that the volunteer's role will be one-off, such as accompanying girls and teachers on a day outing, such measures will not be required, provided the volunteer is not to be left alone and unsupervised in charge of girls.

Where volunteers recruited by another organisation work in the school, for example sports coaches, the DSL must be informed before that volunteer does any work in School and the Clerk will require assurance from that organisation that all proper vetting procedures are in place.

2.11. Children who have suffered/ are likely to suffer serious harm and children in need

This Safeguarding policy notes that Safeguarding, and promoting the welfare of children, is a broader term than Child Protection. It encompasses protecting children from maltreatment; preventing impairment of children's health or development; and ensuring children grow up in safe circumstances.

Child Protection is part of this definition and the subsections below refer to definitions and strategies undertaken to prevent children suffering, or likely to suffer, significant harm. If girls are considered to be likely to suffer significant harm, cases will be referred to Children's Social Care, amongst other agencies. All staff receive training and are therefore aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, **without the provision of services**; or a child who is disabled. If a member of staff has any concerns about a girl in need they must act immediately and inform the DSL. Help can be provided either internally by utilising the extensive pastoral support system we have available at QM, or by referring to universal services or to statutory services if appropriate.

If staff suspect or receive reports that a girl is suffering or is likely to suffer significant harm s/he should take immediate action. The member of staff should inform the DSL who will contact social services and/ or the police as appropriate but in any case within 24 hours of being notified.

NYSCB operate a universal referral form for early help as well as s17 and s47 cases which can be found on the NYSCB website: <http://www.safeguardingchildren.co.uk/worried-about-child>
The dedicated helpline for more urgent cases: 01609-780780

Staff receive regular training on the above ways to make a referral and are aware that anybody within QM can make a referral directly; however, there is an expectation that the DSL will be informed as soon after the referral has been made as possible. A referral to statutory agencies does not require parental consent.

For girls who are in need of additional support at school owing to a variety of other reasons, the School has a variety of channels of help and support. Each girl is assigned a Personal Tutor when they arrive at QM and the girls are informed that they may always seek guidance and emotional support from their tutors, in addition to their Housemistress and the DSL. In addition, the girls may seek extra support from the Emotional Wellbeing Practitioner, who comes to school on a weekly basis. If it is felt that a girl needs more intensive therapeutic help, QM employs two Clinical Psychologists who come to school on a regular basis to provide one-to-one therapy. If it is deemed appropriate, a Common Assessment Framework (CAF) may be written by the DSL with the consent of an individual girl and her parent or guardian. This may lead to a TAC-Team around the Child- multi-agency approach. Furthermore, The Health and Wellbeing Centre is open 24 hours a day and a registered nurse is on-site overnight.

The contact numbers for the Health and Wellbeing Centre:

Health and Wellbeing Centre treatment room: extension 608 [At night, 608 is transferred to the Sister first on call]

HWC: 01904 727608 [This rings in the Health and Wellbeing Centre and all Sisters' accommodation]

HWC: 07970 039782 {Please note that poor signal in some areas of school may mean this phone is not always answered on the first ring}

Peer-on-Peer Abuse

Staff should recognise that children are capable of abusing their peers and any allegations of peer-on-peer abuse will be investigated and dealt with appropriately. There is an understanding at QM that girls with Special Educational Needs or Disabilities may be more vulnerable to peer-on-peer abuse than other girls. QM does its utmost to minimise the risk of peer-on-peer abuse and whilst we recognise that there is a gender nature to peer-on-peer abuse we still approach this topic with an attitude of it can happen here. We are a relatively small school with an enviable staff – student ratio which allows staff to pick up on problems and issues straight away. In addition we have many layers of pastoral support including very small tutor groups where often one to one discussions take place. Furthermore, QM follows the 'Girls on Board' programme which is designed to focus on positive relationships within a girls-only environment and all our prefects receive safeguarding training including peer-on-peer abuse.

We recognise that there are different types of peer-on-peer abuse which may include, but are not limited to, sexual violence and harassment, physical abuse, bullying including cyberbullying and sexting. Peer-on-peer abuse is never tolerated or passed off as banter or part of growing up. Any member of staff receiving a report about peer-on-peer abuse should take time to listen carefully to the girl and reassure her that she has done the right thing to come forward. The member of staff must not ask leading questions or promise confidentiality and should, as soon as practicable, write a summary of the disclosure using the exact words of the girl. Where the disclosure includes an online element staff are aware not to view or forward illegal images of a child. All the information, including written summary, should be passed to the DSL at the earliest opportunity. In cases where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm due to a pupil or a group of pupils abusing them the DSL will work with pastoral staff in School to ensure the absolute safety of the child. If appropriate, such abuse will be referred to Local Outside Agencies and the parents of the child and other children involved will be informed. It is an expectation that in the event of such a disclosure, all children involved, whether perpetrator or victim, would be treated as being 'at risk'.

Victims of peer-on-peer abuse, including sexting, are well supported within school; we take each case very seriously, listen and acknowledge the concerns of the victim and take necessary action swiftly; in any case, consideration is always given to the wishes of the victim in terms of how they want to proceed. School always investigates thoroughly and collates all relevant information; when there is a report of sexual violence the DSL (or Deputy) will record a risk assessment and keep it under review at all times. Unless there are specific reasons not to School will inform parents of the victim and perpetrator of peer-on-peer abuse at the earliest opportunity. If necessary, we will segregate the victim and perpetrator including the option of re-housing a girl for the duration of the investigation. In case of sexting, and where an external person may be involved, police may be informed.

As part of the annual safeguarding training staff are trained to manage a report of sexual violence or harassment and staff should follow guidelines regarding effective safeguarding practices as set out in **paragraph 242 of KCSIE 2018**. When there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm due to a bullying incident, the incident will be treated as a child protection concern.

Reports of child-on-child sexual violence or harassment can be managed

- internally
- as part of an early help approach
- by involving children's social services
- by reporting to the police

Bullying- please see with reference to Policy A8: Countering Bullying

Definition of Bullying

We define bullying as the desire to intentionally hurt, humiliate, threaten or frighten someone. Bullying is a process repeated over time rather than a single act. It can take the form of racial, religious, cultural, sexist special educational needs and disability or sexuality related harassment. It can involve physical (including sexual) and emotional intimidation, cyberbullying, verbal intimidation, threats, ostracism or the spreading of malicious rumours. Cyberbullying can be via email, text messaging, social networking sites (e.g. Facebook), e-photos sent via Instagram or Snapchat.

A bully may well involve a third party e.g. using a friend to tease or torment her victim. The bully can often influence others to take no action to prevent the bullying of the victim, often through fear that they might in time become victims. Bullying can be overt and intimidatory but is often hidden and subtle. Bullying can focus on race, sexuality, gender orientation, special educational needs and disabilities or other physical attributes (such as hair colour or body shape). It can cause serious psychological damage and even suicide.

Harassment and threatening behaviour are criminal offences. QM treats bullying seriously. It is entirely unacceptable to view bullying as a part of growing up or as a means of "toughening up" young people.

Cyberbullying - please see with reference to Policy C4: E-Communications and Policy A8- Countering Bullying

Queen Margaret's School embraces the advantages of modern technology in terms of the educational benefits it brings; however, the school is mindful of the potential for bullying to occur. Central to the school's anti-bullying policy are the beliefs that all girls have the right not to be bullied and that bullying is always unacceptable. QM also recognises that it must take note of bullying perpetrated outside school which spills over into the school.

Definition of Cyberbullying

Cyberbullying is an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend herself.

By cyber-bullying, we mean bullying by electronic media:

- Bullying by means of texts or messages on mobile phones
- The use of mobile phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites, blogs, social networking sites such as Facebook, YouTube
- Hijacking or cloning email accounts

Legal Issues

- It is unlawful to disseminate information in any media, including internet sites.
- Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communication network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.
- The Protection from Harassment Act of 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

Policy

Queen Margaret's educates its girls about the serious consequences of cyberbullying and does, in the PSHE curriculum, continue to inform and educate the girls about these emergent technologies.

Queen Margaret's trains its staff to respond effectively to reports of cyberbullying or harassment and has robust systems in place to respond to it. Queen Margaret's actively endeavours to block access to inappropriate websites, using firewalls, antivirus protection and filtering systems. Where appropriate and responsible, Queen Margaret's audits ICT communications and regularly reviews the security arrangements in place.

Queen Margaret's reserves the right to take action against those who take part in cyberbullying:

- Queen Margaret's supports victims of cyberbullying and, when necessary, will work with the Police to detect those involved in criminal acts.
- Queen Margaret's will use, as appropriate, the full range of sanctions to correct, punish or remove girls who bully other girls or members of staff in this way, both in and out of school.
- Queen Margaret's will use its powers of confiscation where necessary to prevent girls from committing crimes or misusing equipment.
- All members of Queen Margaret's community are aware that they have a duty to bring to the attention of the Head, Jessica Miles, or the DSL, any example of cyberbullying or harassment that they know about or suspect.

Owing to the prevalence of 'youth-produced sexual imagery', formerly known as 'sexting', the Government has introduced guidelines on how schools and colleges can respond to such incidents:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_S_P_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf

Child-on-child sexual Violence and Sexual Harassment

At Queen Margaret's, we acknowledge that, whilst never acceptable, sexual violence and sexual harassment can be driven by wider societal factors such as everyday sexist stereotypes and everyday sexist language. Moreover, we acknowledge that a child abusing another child may have been abused themselves, and emphasising the need to support the alleged perpetrator. If an allegation of sexual violence or harassment were to occur between any girls at QM, or any other young people of either gender outside of the School, those dealing with such issues must be mindful of using such terms as 'victim' or 'perpetrator'. If there is an alleged case involving one or more other school, we recognise the importance of information sharing and effective multi-agency working, especially where children involved in allegations of sexual violence or sexual harassment.

On occasions when the Police decide that no further action will be taken in a case, the School will still continue to engage with specialist support as required.

In the event of a member of staff being subjected to an alleged case of sexual violence or harassment by a girl at QM, robust support measures will be put into place to support the member of staff.

2.12 Types and signs of Child Abuse

The NSPCC defines child abuse as: "Child abuse is the term used when an adult harms a child or a young person under the age of 18... Child abuse can take four forms, all of which can cause long term damage to a child: physical abuse, emotional abuse, neglect and child sexual abuse. Bullying and domestic violence are also forms of child abuse. Abuse can take place wholly online or technology may be used to facilitate offline abuse

Physical Abuse: 'may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to 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 ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development'

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.
- Parental response to a child's problems gives cause for concern

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 and development'

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.

Sexual Abuse: 'involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening'

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.

Staff and volunteers in School are particularly well placed to observe outward signs of abuse, changes in behaviour or failure to develop. **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.**

Children with Special Educational Needs or Disabilities can face additional Safeguarding challenges. At QM, there is an understanding of the potential vulnerabilities of girls with SEND. These can include the assumption that indicators of possible abuse relate to the girl's condition without further exploration. Moreover, there is the potential for girls with SEND being disproportionately impacted by behaviours such as bullying without outwardly showing any signs.

2.13 Female Genital Mutilation (FGM)

See also Annex A of Keeping Children Safe in Education (September 2018) for more information

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

- Circumstances and occurrences that may point to FGM happening:
- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

The most obvious signs that a girl may have been the victim of FGM include the prolonged absence from school (cf C38: Missing Girls) and other activities and behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued. However, other indicators may include:

- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group

- Reluctance to take part in physical activity
- Repeated urinary tract infection
- Disclosure

The 'One Chance' rule

As with Forced Marriage, there is the 'One Chance' rule. It is mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss such a case with the DSL and involve Child Social Care as appropriate. In case of immediate emergency, you should ring 999 in the first instance. Help and advice may also be sought by ringing the NSPCC Helpline on: 0800 028 3550.

Procedural details may be found at the following website:

www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Further information on FGM can be found within Multi-Agency Practice Guidelines at:

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

2.14 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 recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

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 are bringing shame on their family). Financial abuse can also be a factor.

The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
- Breaching a Forced Marriage Protection Order is also a criminal offence.

If you have concerns that a girl may be in danger of becoming a victim of Forced Marriage, you should contact the DSL or Deputy immediately. This case will then be disclosed to the Forced Marriage Unit, which may be contacted at the following number: 020 7008 0151. In an emergency, always dial 999.

Further information on Forced Marriage can be found within Multi-Agency Practice Guidelines at:

<https://www.gov.uk/stop-forced-marriage>

2.15: Radicalisation and Extremism

Please see C8: Prevent Policy for details. In the case of girls being identified as being at risk of radicalisation, the School will need to consider the risk to identify the most appropriate referral, which could include Channel or Children's Social Care.

In the first instance, ring 101- non-emergency Police Helpline or access the following webpage for details:

<http://www.preventtragedies.co.uk/>

<https://www.gov.uk/report-terrorism>

Alternatively, ring the Confidential Anti-Terrorism Helpline: 0800 789 321

2.16 Girls Missing from Education

Since the publication of the latest version of 'Keeping Children Safe in Education' (September 2016), it is a statutory requirement for the School to contact the North Yorkshire LEA *immediately* if a girl leaves Queen Margaret's School outside of 'normal' transition periods ie during a term. In addition, the School should issue nil returns weekly to the relevant department.

If a girl is reported missing during the school day or, as a boarder, at night time, please see C38: Missing Girls Policy for details.

All members of staff must be mindful that a girl missing from education could be a vital sign of a possible safeguarding issue such as FGM, CSE or Forced Marriage- see above. If a girl is missing from education and it is suspected that she may have joined an extremist organisation or travelled to countries such as Syria or Iraq with the intention joining an extremist group or marrying a member of a terrorist group, it will be reported as part of the Prevent Duty- see the following website for details:

http://www.legislation.gov.uk/ukdsi/2015/9780111133309/pdfs/ukdsiod_9780111133309_en.pdf

In all other cases of unexplained absences from school, the School should take guidance from Part 3 of Schedule 1 to the Independent School Standards (England) Regulations 2014 (SI 2010/1997).

Further information may be obtained from the following webpage:

<https://www.gov.uk/government/publications/children-missing-education>

2.17 Child Sexual Exploitation

Sexual exploitation is child abuse and children and young people who become involved face risks to their physical, emotional and psychological health and well-being. Any young person could become a victim of child sexual exploitation; the crime affects both girls and boys, from any background and of any ethnicity. It is the organised and deliberate exploitation of a child purely for the sexual gratification of adults.

There are three main types of CSE:

1. Inappropriate relationships – this usually involves one perpetrator who has inappropriate power or control over a young person. There is often a significant age gap and the victim may believe they are in a loving relationship.
2. 'Boyfriend' model – the perpetrator befriends and grooms the young person into a 'relationship' and then convinces or forces them to have sex with friends or associates. This is sometimes associated with gang activity. Peer exploitation is where young people are forced or coerced into sexual activity by peers and associates. Sometimes this can be associated with gang activity, but not always.
3. Organised sexual exploitation – young people are passed through networks, possibly over geographical distances, where they are forced into sexual activity with multiple men. This often occurs at 'sex parties' and the young people may be used to recruit others into the network. Some of this activity is described as serious organised crime and can involve the organised 'buying and selling' of young people by perpetrators.

Know the Signs Even something that seems like normal teenage behaviour could be a sign that a child is being sexually exploited. The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections

- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

What to do:

If you have any concerns that a child you know may be a victim of Child Sexual Exploitation report it to the DSL. In an emergency or if a crime is ongoing always dial 999.

Child Criminal Exploitation: County Lines

Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines activity. It is a harm which is relatively little known about or recognised by those best placed to spot its potential victims. County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.

For more details on Child Criminal Exploitation, please see the following website:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/626770/6_3505_HO_Child_exploitation_FINAL_web_2_.pdf

2.18 Remediating defects in this Policy

The effective protection of girls is the first duty of all members of the QM community. If a deficiency in the safeguarding arrangements is detected by anyone, they must report that to the DSL immediately and he will take steps to remedy it without delay.

2.19 Complaints Procedure

If there is a need to complain about the operation of this Policy, this can be done following Queen Margaret’s Complaints Policy (Policy B16), which is available on the school website: www.queenmargarets.com.

2.20. Other Sources of Help

More detailed information including online training materials can be received from the North Yorkshire Safeguarding Children's Board as well as general guidance and advice which are available on their website, www.safeguardingchildren.co.uk.

Advice if you are worried about a child may be obtained by visiting:

<http://www.northyorks.gov.uk/article/24401/Children-and-family-care> or telephoning 01609 536993.

Lars Fox
Senior Deputy Head & Designated Safeguarding Lead

Updated: 15/01/2019
Next review: September 2019