



## ALDENHAM SCHOOL

# SAFEGUARDING POLICY

[safeguarding@aldenham.com](mailto:safeguarding@aldenham.com)

Revised September 2020  
by the Assistant Head – Safeguarding and Welfare, Head of  
Senior School & Head of Prep School

Updated January 2021  
To reflect changes in personnel

Chair of Governors ..... Date .....  
*J. T. BARTON* ..... *8/12/20* .....

Safeguarding Governor ..... Date .....  
*DAN HOLEY* ..... *10/12/2020* .....

Aldenham School recognises the contribution it makes to the safeguarding of children and the responsibility it has under Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 to have arrangements in place to safeguard and promote the welfare of children.

## **Policy Statement**

The School's Child Protection and Safeguarding Policy and Procedures has regard to statutory guidance *Keeping Children Safe in Education (KCSIE) (updated Sept 2020)*, *Working Together to Safeguard Children 2018*, *DFE guidance on Child Sexual Exploitation 2017*, *DBS barring referral guidance 2018* and the *Prevent Duty Guidance April 2019*.

The Safeguarding Policy is ratified by the Aldenham School Governors and reviewed on a regular basis (at least annually). The Governors recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis. Opportunities in the form of meetings and discussions are provided for all staff to contribute to the shaping of the safeguarding arrangements and policy.

The safeguarding procedures apply to all members of teaching and support staff, supply staff, volunteers and Governors, when working with pupils, even where this is away from the School, for example on an educational visit.

Every pupil should feel safe and protected from any form of abuse. This includes children who are in need (Section 17, Children Act 1989) and children who are at risk of harm (Section 47, Children Act 1989). The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

The School will take all reasonable measures to:

- Practise safer recruitment in checking the suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children and young people in accordance with: the guidance given in *Keeping children safe in education* (September 2020); the Education (Independent School Standards) (England) Regulations 2014 (as amended, particularly with non-statutory guidance issued in April 2019).
- Ensure that where staff from another organisation are working on their own with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff;
- Follow the local inter-agency procedures of the Hertfordshire Safeguarding Children Partnership (HSCP) and other Local Authorities as appropriate
- Be alert to signs of abuse both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
- Deal appropriately with every suspicion or complaint of abuse and to support pupils who have been abused in accordance with an agreed child protection plan;
- Implement procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- Be alert to the additional needs of pupils with medical conditions and other special needs;
- Ensure that, as far as possible, pupils' mental health is considered at all times by the School and, where possible, interventions to support mental health needs are undertaken; where this is not possible referral to external agencies will be made;
- Operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- Teach pupils about safeguarding, for example through the Life Matters programme, PSHE lessons, visiting speakers and the tutorial programme;
- Take all practicable steps to ensure that School premises are as secure as circumstances permit;
- Operate procedures to promote the educational achievement of looked after children;
- Have procedures in place for dealing with pupils who go missing from education in accordance with KCSIE (September 2020);

- Be alert to the threats of specific safeguarding issues as outlined by KCSIE such as Child Sexual Exploitation and Female Genital Mutilation (from October 2015 it has been mandatory to report cases or suspected cases of FGM) and protecting children from involvement in Gang Violence and County Lines;
- Teach pupils the principles of e-safety and have appropriate blocking mechanisms in place to protect against the flow of inappropriate material on the school's IT systems;
- Have procedures in place to fulfil the School's Prevent duty, to identify children at risk of radicalization, extremism and being drawn into terrorism, protect them and making referrals as appropriate;
- Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in the local area;
- Have regard to guidance issued by the Secretary of State for Education in accordance with section 157 of the Education Act 2002 and associated regulations.
- Take action to enable all children to have the best outcomes of their time in school.

## SUMMARY

### What to do:

If you suspect abuse, a young person confides in you, or a complaint is made to you about any adult or about yourself, it is your duty to report the concern to the Designated Safeguarding Lead (DSL). The DSL for the Aldenham Senior and Prep schools is the Revd Philip Green (tel: 07884 585324; psg@aldenham.com).

If a young person tells you about abuse by someone else:

- Always stop and listen straightaway. Ask open-ended questions such as ‘What happened?’ and ‘Who was involved?’, rather than leading questions such as ‘Did X do this to you?’
- Write brief notes outlining the conversation either during or immediately after the disclosure. It is important that you try to record the pupil’s words objectively and without judgement. Sign and date your notes.
- Do not guarantee confidentiality. Explain that you will have to report the matter to the DSL so that they can offer help and guidance.
- Report the matter to the DSL, either directly or via MyConcern, and give them your signed notes. (If a child is at immediate risk of harm, you must contact the DSL in person as soon as possible, even if it means arranging emergency cover for a class. **This is a top priority.**)
- The DSL will inform you if you have any further obligations.
- If you are not happy with the DSL’s response, you have the right to refer the matter directly to Children’s Services.

### Confidentiality

Adults at the School should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should, however, guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to resolve the problem. They should never tell anyone who does not have a clear ‘need to know’, and that they will take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made. Every effort will be made to maintain confidentiality and guard against unwanted publicity for both the victim and the accused. These restrictions apply up to the point where the accused person is charged with an offence or the DfE/Teaching Regulation Agency (TRA) publish information about an investigation or disciplinary case (KCSIE Sept 2020).

### Sharing confidential information

Concerns regarding Safeguarding issues inevitably involve the sharing of highly sensitive information. Whilst colleagues should be aware of their obligations under the General Data Protection Regulations (GDPR), the reticence to share sensitive information should **never** be used as a reason for not passing on information to the DSL about a child at risk of harm. The School’s Safeguarding Management Software, MyConcern, is fully GDPR-compliant and should be the sole means (other than a direct report to the DSL) by which concerns are raised.

Notwithstanding the paragraph above, colleagues should be aware that confidential information placed on MyConcern is not necessarily exempt from a Subject Access Request (SAR). Therefore, care should be taken to ensure that information is as objective as possible in the circumstances, and only information relevant to a particular child is raised in a concern.

## I. Policy Basics

Date of next Review: September 2021

The School appoints a Designated Safeguarding Lead in charge of safeguarding for the whole School. This appointment is held by, the Revd Philip Green, who works in the Senior School. In his absence, the Deputy Head of Aldenham Prep School, Mrs Sarah Galpin, acts as a deputy DSL (DDSL) for the whole School. Mrs Galpin is on the SLT of the Prep School, and Revd Green is a member of the Senior School SMT, who will bring safeguarding matters to the SMT at any time. Both Mrs Galpin and Revd Green have the requisite seniority and status in the School to deal with allegations of a very serious nature, including those against other SMT and SLT members. The Deputy Head (Pastoral) of the Senior School, Emma Murray, and Chaplain to the Foundation, the Revd Jos Perris, also act as DDSLs. Both have been trained to an appropriate level.

### Important contacts within the school

#### **Designated Safeguarding Lead (DSL):**

**The Revd Philip Green (Assistant Head – Safeguarding):** 07884 585324  
01923 851636  
[psg@aldenham.com](mailto:psg@aldenham.com)

#### **Deputy Designated Safeguarding Leads (DDSLs):**

**Mrs Sarah Galpin (Prep School Deputy Head):** 01923 851649  
(Prep School inc. EYFS) [smgalpin@aldenham.com](mailto:smgalpin@aldenham.com)

**Mrs Emma Murray (Senior School Deputy Head):** 01923 851639  
[eemurray@aldenham.com](mailto:eemurray@aldenham.com)

**The Revd Jos Perris (Chaplain to the Foundation):** 07557 008543  
[chaplain@aldenham.com](mailto:chaplain@aldenham.com)

Any concerns about a member of staff should be reported direct to the Headmaster and CEO of the Aldenham Foundation, James Fowler.

### **Pastoral Leadership**

Headmaster/CEO	James Fowler (01923 851600)
Head of Prep	Vicky Gocher (01923 851653)
Head of Senior School	Andy Williams (01923 851608)
Deputy Head (Pastoral)/Deputy DSL	Emma Murray (01923 851639)
Designated Governor for Safeguarding	Deborah Nicholes (contact via School Office)
Chair of Governors	Trevor Barton (01923 850866 / 07881 518643)

**Note: Pupils at Aldenham have homes in a number of different Local Authorities, each of which has its own safeguarding procedures. Before proceeding with a referral, it is essential to establish the pupil's normal place of residence, which can be found on PASS (the School's Management Information System.) The appropriate Local Authority can then be ascertained by putting the postcode in the Government's website [Reporting Child Abuse to your local council](#). Any allegation against a member of staff is referred to Hertfordshire, as are incidents involving full time boarders.**

**The details below and throughout this document refer to pupils resident in Hertfordshire (including full boarders), unless otherwise stated. When the child resides in another Local Authority, guidance should be sought (either from the DSL or direct from the LA's website) regarding the particular arrangements for that Local Authority.**



## Introduction

The welfare of all children (including EYFS) at Aldenham School must be the primary concern for all staff and the School will do all that it can, within reason, to ensure that the children in our care are safe and happy.

Safeguarding children is the action we take to promote the welfare of children and protect them from harm. **Every adult who comes into contact with our pupils has a role to play. Although referrals are usually managed via the DSL anyone can refer a child to children's social care in necessary. Safeguarding children is everyone's responsibility.**

The *Teacher Standards 2012* state that teachers, including Headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties and all staff have a responsibility to take appropriate action, working with other services as needed.

## Terminology

**Child Protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

**Abuse** is defined as form of maltreatment of a child. Abuse may take the form of physical, emotional or sexual abuse and includes neglect. This may involve inflicting harm, or by failing to act to prevent harm. Children may be abused by an adult or adults or another child or children.

Safeguarding and promoting the welfare of children is defined for the purpose of this guidance as:

- Protecting children at risk from maltreatment and promoting the welfare and wellbeing of children in need of additional support, even if they are not suffering harm or at immediate risk.
- Preventing impairment of children's health or development, including mental health.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes. (*Working Together to Safeguard Children DFE 2018*).

This policy seeks to demonstrate the commitment of the Headmaster, all staff (including temporary staff), contractors, volunteers and the governing body to promoting a safe environment for children and to report any allegations of abuse or suspicions of abuse to the relevant local authority agency.

The School's Safeguarding Policy takes into account the statutory guidance, local child protection procedures and best practice. The School is committed to remedying any difficulties or weaknesses without delay. The policy is reviewed annually and presented to the governors.

The policy is written and reviewed by the Designated Safeguarding Lead in consultation with the Head of Senior School, Deputy Head (Pastoral) and the Head of Prep, and is ratified by the Governing Body of the School on at least an annual basis.

The safeguarding arrangements have regard to official guidance in:

- The Education Act 2002
- The Children Act 2004
- Working Together to Safeguard Children (2018) (WTTSC)
- Keeping Children Safe in Education (Sept 2020)
- National Minimum Standards (2015)
- What to do if you're worried a child is being abused: guidance for practitioners (2015)
- Information Sharing – Advice for practitioners providing safeguarding services to vulnerable children, young people, parents and carers (2018)

- Statutory framework for the Early Years Foundation Stage (2017)
- Revised Prevent duty guidance for England and Wales (2019)
- Female Genital mutilation; multi- agency practice guidelines (2014)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK council for child internet safety, (UKCCIS) 2016))
- Child Sexual Exploitation: definition and guide for practitioners (and annexes), 2017
- DBS barring referral guidance 2018
- DFE guidance on Sexual Violence and Sexual Harassment (SVSH), May 2018
- Home Office guidance on Preventing Youth Violence and Gang Involvement, March 2015
- Home Office County Lines Guidance, February 2020
- DFE: Mental Health and Behaviour in Schools (November 2018)
- National Police Chiefs' Council: When to Call the Police (2020).

When paying due regard to this guidance, colleagues must take account of any particular circumstance or context of the School which may indicate a need for protocols greater than the minimum legal requirements.

The Safeguarding Policy is one in a series of policies and guidance notes which relate to safeguarding. This should be read in conjunction with:

- Acceptable Use of ICT and Mobile Phone Policy for Pupils
- Anti-bullying Policy
- Behaviour and Discipline Policy
- Code of Professional Conduct
- Health and Safety Policy
- Independent Listener Guidance
- Life Matters Policy
- Low-level Concerns Policy
- Missing Pupil Policy
- Recruitment Policy
- Restraining Pupils Policy
- Safeguarding of Boarders Policy
- Safeguarding Policy – Covid-19 Addendum
- Smoking, Alcohol and Misuse of Drugs Policy
- Social Media Policy
- Transporting Pupils Policy
- Trips and Educational Visits Policy
- Visitor Policy
- Whistleblowing Policy

The School has also signed the Boarding Schools' Association Commitment to Care Charter (September 2017) and fully abides by its principles and procedures.

The School follows the procedures established by Hertfordshire Safeguarding Children Partnership and is in accordance with locally agreed inter-agency procedures.

### **Role of the School Governors**

This policy has been authorised by the Governors, is addressed to all members of staff and volunteers and is available on the School website and to parents via MySchoolPortal (MSP) and on request. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example, at an activity centre or on an educational visit.

Governors ensure that:

- The DSLs and DDSLs have undertaken appropriate training in child protection and inter-agency working.
- The Safeguarding Policy and procedures are consistent with Hertfordshire Safeguarding Children Partnership (HSCP) requirements and are reviewed annually and made available to parents, staff and pupils.
- The School has procedures in place to deal with allegations of abuse made against members of staff and volunteers, including allegations made against the Headmaster.
- The School operates Safer Recruitment procedures which include statutory checks on the suitability of all staff and volunteers to work with children.
- The School carries out SI28 checks on all new members of the Senior Management Team and Heads of Department
- The School has in place a training strategy that ensures all staff receive appropriate Safeguarding training, which includes initial training before any contact with children (or as soon as is practicably possible thereafter), refresher training and updates at least annually. As part of the regular safeguarding level 1 training given to all staff and volunteers, they will also receive regular updates in line with HSCP advice to include Prevent and e-safety plus informal updates when needed.
- The DSL and DDSLs receive refresher training every 2 years.
- The School makes all volunteers and temporary staff aware of Safeguarding arrangements via a leaflet containing essential information and a verbal briefing when they first report for duty.
- A member of the governing body (normally the Chairman) is nominated to be responsible for liaising with the local authority in the event of an allegation being made against the Headmaster.

### **Safer Recruitment**

All school appointments are subject to safer recruitment guidelines. Key staff including the Headmaster, the Head of Senior School and the Head of Prep are trained in safer recruitment.

Appointments are not made without suitable checks and evidence including criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information. All such information is stored on the single central register.

For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity.

In summary, a person will be considered to be engaging in regulated activity if as a result of their work they:

- Will be responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engage in intimate or personal care or overnight activity, even if this happens only once.

For all other staff who have an opportunity for contact with children who are not engaging in regulated activity, e.g. on-site contractors, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.

A **supervised** volunteer who regularly teaches or looks after children is not in regulated activity.

For more information refer to Aldenham Foundation Recruitment Policy and KCSIE 2020.

## 2. Duty of Care

The Children Act (2004) places a “Duty of Care”:

- On the School in respect of a risk or perceived risk of significant harm to a child.
- On a Headmaster of an independent school to report to a local social services department any evidence or suspicion of children being or at risk of being abused.
- on all members of staff to report to his/her manager the same evidence or suspicion.

In the document *Working Together to Safeguard Children* (2018) and KCSIE (2020) our role as a School is clearly set out and our statutory duty is made clear. All staff will read KCSIE part I and those working directly with children will also read Annex A annually and will complete an online assessment to ensure they have understood the contents.

Sections 175 and 157 of the Education Act 2002 places a duty on independent schools to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils at the school.

KCSIE (September 2020, Sections 42 to 45) states:

If staff have any concerns about a child’s welfare, they should act on them immediately. See Appendix B for a flow chart [copied from p17 of KCSIE] setting out the process for staff when they have concerns about a child [para. 42]

If staff have a concern, they should follow their own organisation’s child protection policy and speak to the Designated Safeguarding Lead (or deputy). [para. 43]

Options will then include:

- Managing any support for the child internally via the school or college’s own pastoral support processes;
- An early help assessment; and,
- A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm. [para. 44]

The DSL or a Deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or Deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Leadership Team and/or take advice from local children’s social care. In these circumstances, any action taken should be shared with the DSL (or a Deputy) as soon as is practically possible. [para. 45]

**If anyone other than the Designated Safeguarding Lead makes a referral, they should inform the Designated Safeguarding Lead as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming. The online tool [Reporting child abuse to your local council](#) directs staff to their local children’s social care contact number.**

In accordance with Section 11 of the Children Act (2004), Teachers’ Standards (2012) and KCSIE (2020), the school has in place arrangements that reflect the importance of safeguarding and promoting the welfare of children. These include:

- Appointing a designated professional lead for safeguarding (referred to as the DSL).
- A clear line of accountability for the provision of services designed to safeguard and promote the welfare of children.

- A clear commitment by senior management to the importance of safeguarding and promoting children’s welfare including appointing a Governor to take leadership responsibility for safeguarding arrangements.
- Promoting a culture of listening to children and taking account of their wishes and feelings.
- Making arrangements which set out clearly the processes for sharing information with other professionals and the HSCP.
- To provide appropriate supervision and support for staff including undertaking safeguarding training and so ensure that staff are competent to carry out their responsibilities for safeguarding, promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
- Providing staff with mandatory induction including familiarisation with **Child Protection Procedures** and subsequent reviews and updates to all staff and residents, as necessary (minimum update every three years). The induction programme includes familiarisation with the School’s Safeguarding policy, Professional Conduct guide, Whistle-blowing policy and KCSIE (Part I) and Annex A for those dealing directly with children. All staff are required to read these and complete a short online assessment to ensure they have understood the contents and the procedures which must be adhered to. In addition, the DSL (Philip Green) and DDSLs (Sarah Galpin, Emma Murray and Jos Perris) will be introduced, or will lead the training, and staff will be made aware of how to contact them.
- Using safe recruitment practices in accordance with KGSIE (Sept 2020)
- Providing clear guidelines with reference to HSCP, in accordance with locally agreed interagency procedures, for dealing with allegations against staff. Allegations may relate to a person who works with children who has:
  - Behaved in a way that has harmed a child, or may have harmed a child.
  - Possibly committed a criminal offence against or related to a child.
  - Behaved towards a child or children in a way that indicated they may pose a risk of harm to children.
- Involving the Local Authority Designated Officer (LADO) in the management and oversight of individual cases (the LADO should be informed within 24 hours of all allegations that come to the school’s attention or are reported directly to the Police.)
- Making referrals to the Disclosure and Barring Service (DBS) if an individual (paid or volunteer) is removed from work looking after children because it is deemed that they pose a risk of harm to children.

The documents *Working Together to Safeguard Children (2018)* and *KCSIE (2020)* promote a multi-agency approach to the care of children and set forth the good practice of separate agencies co-operating and working together for the benefit of the child.

The Aldenham School Safeguarding Children Policy and procedures also takes into account the requirement of the National Minimum Boarding Standards (2015), Standards 11 & 14. Particular consideration must be given to any allegations or disclosures of abuse or possible abuse concerning themselves or another boarder, particularly if the subject of the allegation is another boarder or a member of staff. In such circumstances it may be necessary to arrange alternative accommodation for boarders to ensure the safety and well-being of the pupil and appropriate pastoral support. Boarders are also provided with one or more appropriate helpline(s), including Childline, the NSPCC, the School Counsellor and Hertfordshire Social Services, to call in case of problems or distress. In addition, posters with the DSL’s and DDSLs’ contact details will be widely displayed throughout the School.

For further details, please see the Safeguarding of Boarders Policy.

## EYFS

The Aldenham Prep School Safeguarding Policy applies to all pupils including EYFS. With specific reference to EYFS and in accordance with the statutory framework for EYFS 2017, staff must refer and adhere to the Taking, Storing and Using Images of Pupils Policy of the setting which states that staff,

visitors, volunteers and students are not permitted to use their own mobile phones or cameras to take or record any images of Foundation Stage children for their own records during session times. All visitors read this policy as part of the 'signing in' procedure in the Foundation Stage.

Cameras and mobile phones are **prohibited** in the toilet areas. (Full policy can be found in Foundation Stage office). The Intimate Care Policy must also be adhered to.

### **3. The Designated Safeguarding Leads and Deputies**

The Governors approve the job descriptions of the DSL and DDSLs, and ensure they have sufficient time, funding, supervision and support to perform their duties. Safeguarding is an agenda item at every meeting of the Board of Governors and the Education Committee. The Designated Governor for Safeguarding reports annually to the Governors on Safeguarding and a minute is kept. Governors understand they have no right of access to information involving any child protection cases within the school or to information involving an allegation against a member of staff unless/until it becomes an internal disciplinary issue. The exception to the above would occur if an allegation was made against the Headmaster. Such an allegation would be referred to the Chair of Governors and they would be required to contact the LADO.

The School appoints a Designated Safeguarding Lead (DSL) and a sufficient number of Deputy Designated Safeguarding Leads (DDSLs) to ensure an appropriate level of provision is maintained at all times. There are currently three DDSLs in place.

In addition, the Headmaster, the Head of Senior School and the Head of the Prep School are trained in Safeguarding and Child Protection and will receive any concerns should the DSL or DDSLs not be immediately available.

#### **The Role of the DSL**

The DSL is responsible to the Headmaster for the following broad areas:

- Briefing school staff (boarding support staff, teaching staff and volunteers), and as appropriate, prefects and other senior pupils on the relevant contents of the above guidance and procedures, and on the procedures the school should follow below - including the briefing of new staff as part of their induction after arrival at the school.
- Receiving reports of alleged or suspected child abuse within the school, or reported by a pupil relating to incidents at home or outside the school, contacting the HSCP (or relevant Local Authority) and taking other action in response, as set out below.

#### **Managing Referrals**

The DSL will refer all cases of suspected abuse to the Hertfordshire Safeguarding Children Partnership (HSCP), or relevant local authority for pupils who reside outside Hertfordshire, and

- The Local Authority Designated Officer (LADO) for dealing with all Child Protection concerns that relate to a staff member. The Hertfordshire DOs are Tony Purvis, 07920 283106, Yvette Morello, 01992 556463 and Marrie Moat (Admin), 01992 555420. Referrals must be submitted on the appropriate form to [LADO.Referral@hertfordshire.gov.uk](mailto:LADO.Referral@hertfordshire.gov.uk).)
- The Disclosure and Barring Service (cases where a person is dismissed, resigns or leaves due to risk/harm to a child)
- The Police (cases where a crime may have been committed).
- The TRA and the Charities Commission as required
- The Boarding Schools Association if the incident occurred in the Senior School

The DSL will refer all allegations against members of staff directly to the Headmaster, except in the event of the allegation being against the Headmaster, in which case the DSL will communicate directly

to the Chair of the Governors without notifying the Headmaster.

Allegations against the DSL should be referred to the Headmaster or the local safeguarding board without notifying the DSL.

The DSL is also responsible for:

- Ensuring that children on the edge of care (those on a Child Protection Plan or with sufficiently serious intervention from other external agencies) are known to all staff and that their learning needs are catered for appropriately This includes ensuring that a culture of high aspirations is in evidence for the child(ren) and working with relevant staff (both inside and outside the School) to identify specific challenges the child(ren) may face. The DSL should also liaise with other relevant senior staff to ensure that the overall curriculum followed by a child in this position is tailored to their own situation as precisely as is practicable.
- Receiving reports of alleged or suspected child abuse within the school or reported by a pupil relating to incidents at home or outside the school, contacting children's services and taking other action in response, as set out below.
- Providing guidance to parents, children and staff about obtaining suitable support.
- Developing links with relevant statutory and voluntary agencies.
- Monitoring and evaluating the effectiveness of the school's Safeguarding Policy and ensuring it is updated at least annually.
- Keeping accurate records of all concerns, ensuring that such records are stored securely on the MyConcern Safeguarding platform.
- Ensuring that when a pupil with a child protection plan leaves the school, appropriate levels of liaison between DSLs occur and the pupil's information is transferred to the DSL at their new school as soon as possible. The details of the recipient of files (date, school, DSL, authority etc.) will be recorded in line with the Retention of Data and Erasure of Personal Information Policy and the DSL will ensure that the child protection file is transferred separately from the main pupil file, either directly via MyConcern or via secure mail.
- Liaising with the Head of Technology, the Head of Computing or Prep School Computing Co-ordinator, and the Head of Life Matters or Prep PSHE Co-ordinator to ensure that the highest possible standards of e-safety are taught and maintained in the School.

In addition, the DSL should liaise with the Headmaster and the relevant Head of School to inform them of issues especially ongoing enquiries under section 47 of the Children Act 2004 and police investigations. The DSL should act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

## **Training**

The Designated Safeguarding Lead (DSL) should:

- Receive appropriate training carried out every two years in order to understand the assessment process for providing early help and intervention. Revd Green was last trained in Advanced Safeguarding in August 2020.
- Ensure that DDSLs also receive training to an appropriate standard. Mrs Galpin was trained in February 2020; Mrs Murray was trained in October 2019 and Revd Perris in September 2020.
- Have a working knowledge of how local authorities conduct a child protection initial conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff is aware of and understands the school's Safeguarding Policy and procedures, especially new and part time staff. This should include:
  - The Safeguarding Policy and procedures
  - The staff code of conduct
  - The identities and contact details of the DSL and DDSLs
  - The role of the DSL

All staff will be provided with a copy of KCSIE (Part I) and required to confirm that they have both read and understood its contents. In addition, all staff working directly with children, and those involved in the admissions process, should be provided with a copy of KCSIE Annex A, and complete a brief online assessment to ensure that they have understood its contents.

All staff members should receive safeguarding and child protection updates at least annually to ensure they have relevant and current skills and knowledge to safeguard children effectively. Staff should ensure they understand their role in the early help process including identifying emerging problems, liaising with the DSL, sharing information with other professionals and in some cases acting as the lead professional in undertaking an early help assessment.

Specifically, the DSL should brief school staff (boarding, support staff, teaching staff and volunteers), and as appropriate, prefects and other senior pupils on the relevant contents of the Safeguarding policy and on the appropriate procedures to follow in case of a concern - including the briefing of new staff as part of their induction after arrival at the school.

Governors also undertake full Safeguarding training on a 3-yearly basis and are given updates by the DSL on at least an annual basis. They sign to say they have read and have understood the contents of KCSIE Part One every year.

## **Raising Awareness**

The DSL should:

- Ensure the school's safeguarding policies are known and used appropriately.
- Ensure the school's Safeguarding Policy is reviewed at least annually and the procedures and implementation are updated.
- Work with nominated safeguarding Governor to review and update policies and keep them apprised of safeguarding procedures and concerns as appropriate.
- Ensure the Safeguarding Policy is published on the MySchoolPortal and website.
- Ensure that parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this process.
- Link with HSCP and other Local Authorities to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the school, ensure their Safeguarding file is forwarded to any new school or college as soon as possible but transferred separately from the main pupil file (in line with GDPR guidelines)
- If children leave the school, and safeguarding concerns were present, and their future educational establishment is unknown – the DSL should contact the relevant Children's Services and the correct Local Education Authority to flag the concern.
- The School admissions offices request that all feeder schools complete a safeguarding declaration form once pupils have accepted a place at a Foundation school, but before they commence their studies. This requires feeder schools to disclose any child protection/safeguarding issues that have arisen while the child is in their care or that the school is aware of from other sources. An example of this form is at the end of this document.

The DSL is responsible for holding the school's copy of the current *Local Safeguarding Children Partnership Procedures* and being fully conversant with these procedures. In addition, they should hold and be conversant with the following:

- Keeping Children Safe in Education (2020)
- What to do if you're worried a child is being abused (2015)
- Hertfordshire Safeguarding Children Partnership Child Protection Procedures  
<http://hertsscb.proceduresonline.com/chapters/contents.html>
- Working Together to Safeguard Children DfE (2018)
- Boarding Schools: National Minimum Standards (2015)

## Promoting Fundamental British Values (FBV)

Aldenham teaches a broad and balanced curriculum which promotes the spiritual, moral, social and cultural development of pupils and prepares them for the opportunities, responsibilities and experiences of life. It places great emphasis on the promotion of community cohesion. Aldenham promotes FBV in many of its day to day interactions with pupils. Examples of this include whole school assemblies, Chapel services, Life Matters classes, PSHE lessons, talks and presentations, the School council, tutorials and House competitions.

Aldenham is a multi-cultural and multi faith school, which aims to:

- Ensure children become valuable and fully rounded members of society, who treat others with respect and tolerance regardless of background
- Promote the FBV of democracy, the rule of law, individual liberty and mutual respect and tolerance for those of different faiths and beliefs
- Promote mutual respect amongst pupils and ensure they are fully prepared for life in modern Britain when they leave school.

As a result of this Aldenham expects pupils to:

- Gain an understanding of how citizens influence decision making through democratic processes
- Recognise that freedom to hold faith and beliefs is protected in law
- Accept that people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated and should not be the cause of prejudicial or discriminatory behaviour
- Recognise the means of identifying and combatting discrimination

Guidance on promoting fundamental British values in schools is available at:

[www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published](http://www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published).

## Prevent

Aldenham has a duty of care to both pupils and staff. This includes safeguarding them from the risk of being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The government has defined extremism in the Prevent strategy as: *“vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs”*.

Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and extremist ideas that are part of the terrorist ideology and learn how to challenge these ideas. Aldenham does not intend to limit discussion of these or other issues related to FBV e.g. democracy, law and government, however, it is mindful of its existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

The Prevent strategy, published by the Government in 2011 and updated in 2019, is part of the overall counter- terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on schools to have “due regard to the need to prevent people from being drawn into terrorism”.

The 2011 Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it

- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

**If staff become aware of activity that could fall within the categories outlined in the Prevent strategy, they must pass the information on to the Headmaster, the Head of Senior School or the Head of Prep immediately.** If required, the School will work with the local authority to make appropriate referrals to Channel, a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- Identifying individuals at risk;
- Assessing the nature and extent of that risk; and,
- Developing the most appropriate support plan for the individuals concerned.

Further guidance can be found at [www.gov.uk/government/publications/channel-guidance](http://www.gov.uk/government/publications/channel-guidance).

There is no such thing as a ‘typical extremist’ and those involved in extremism come from a range of backgrounds and experiences. A list of indicators is attached as Appendix C to provide support for staff to understand and identify factors that could suggest a child or their family may be vulnerable or involved with extremism. The list of indicators is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people / young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual’s identity determines their vulnerability to extremism. Over-simplified assessments based upon demographics and poverty indicators have consistently demonstrated to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate and recruit.

All staff receive training on recognising the indicators of potentially vulnerable children and those who may be susceptible to radicalisation and the associated risks (such as being drawn into extremism or terrorism).

See Appendix C for indicators of vulnerability with regard to extremism.

#### **4. What to do if a child makes a disclosure of alleged abuse or if you are concerned about a child**

Children who report abuse to a teacher (or other member of staff or volunteer) must be **listened to** and **heard**, whatever form their attempts to communicate their worries may take. You should engage the DSL or a DDSL in this process as soon as is practicable. The following points give guidance on how to deal with a child who makes an allegation or reports an allegation:

- The child should be listened to but not interviewed or asked to repeat the account
- Avoid questions, particularly leading questions
- The child should not be interrupted when recalling significant events
- All information should be noted carefully immediately following the conversation, including details such as timing, setting, who was present and what was said, in the child’s own words. The account obtained should be recorded verbatim or as near as possible
- Care should be taken not to make assumptions about what the child is saying or to make interpretations or decisions about whether or not abuse has occurred.
- ‘Listened to’ means just that; on no account should suggestions be made to children as to alternative explanations for their worries
- Advice or promises must not be given to the child other than the assurance that they have done the right thing in telling you and that you will be passing on their concern to the relevant person

- The written record of the allegations should be signed and dated by the person who received them as soon as practicable, although priority should always be given to referring the incident to external agencies if required.
- These notes should be uploaded onto MyConcern as soon as possible after the disclosure.
- All evidence (e.g. scribbled notes, mobile phones containing text messages, clothing and computers) must be safeguarded and preserved so they can be passed on to the DSL/DDSL intact.
- All actions subsequently taken should be recorded with dates, times and signature.

N.B the School does not require parental consent to make a referral to social services but will seek to engage parents in the process unless doing so is likely to put the child at further risk.

You must then immediately inform the DSL, a DDSL or, in his/her absence, the Head of Senior School, the Deputy Head (Pastoral), the Head of Prep or the Headmaster (see contact list toward the end of this document for details).

If you are uncertain about whether or not to be concerned about a child, it is always best to share that information with the DSL/DDSL.

A member of staff or volunteer may come across circumstances where they suspect or observe abuse by pupils/students on other pupils/students the abuse may take the form of:

- verbal, physical, emotional abuse
- intimidation or bullying
- sexual abuse

Whilst children and young people who abuse others need to be held responsible for their abusive behaviour, it is also important that whilst being identified, they are responded to in a way that meets their needs as well as protecting others. They may well be children in need or at risk themselves. This sort of concern is to be reported to the DSL/DDSLs in the same way as any other form of abuse or suspected abuse; the Anti-bullying Policy should also be consulted.

## Confidentiality

A member of staff or volunteer **must not promise absolute confidentiality**. The child can be assured that whilst you cannot keep an allegation of abuse or suspected abuse to yourself, you will not tell anyone who does not need to know. It is best not to explain procedures in detail to the child but to say that the DSL will have to be told and will decide the next course of action.

## The DSL

The DSL (or DDSL under the direction of the DSL as appropriate) will take charge in School and make contact with the relevant people and execute the appropriate procedures. This will take into account the local inter-agency procedures of the HSCP and other Local Authorities. (See the flowchart in Appendix B for reference.) The DSL should also have due regard to the information included in the NPCC document *When to Call the Police* in deciding how to proceed with an incident.

A complaint involving a criminal offence will always be referred to the LADO or the police without further investigation by the School. The BSA will be informed (without disclosing any personal details of the case), in accordance with the Commitment to Care Charter, if the subject of the complaint works in the Senior School.

The member of staff or volunteer who is the subject of the allegation will be updated and supported throughout the process as appropriate. This may include providing alternative off-site accommodation if the colleague is suspended from duties, pending a full investigation.

The DSL is available to talk to staff about their concerns which can be raised on a 'what if' basis if necessary.

The action taken by the DSL may take into account the wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there are times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, which overrides a pupil's wishes. In addition, the DSL may consider the wishes of the complainant's parents, provided they have no interest which conflicts with the best interest of the pupil and that they are properly informed. Again, it may be necessary to override the parental wishes in some circumstances. The DSL will seek to involve appropriate pastoral staff (e.g. the HSM) on a need-to-know basis as soon as possible.

## **Referral Guidelines**

Allegations against anyone working or volunteering at the school must be referred to the LADO within 24 hours of the referral being made

If a crime may have been committed, it should be reported to the police in accordance with Working Together procedures. The DSL will make judgements as to whether the child is 'in need' or 'at risk'. Where boundaries are unclear, the DSL will discuss the matter with the LADO (if staff are involved) or the Local Safeguarding Children's Board (for example, Hertfordshire's Targeted Advice Service or Brent's MASH team) to seek further guidance.

For example, in the following circumstances the DSL may take advice from the LADO or children's social care before a decision about making a referral is made:

- The complaint does not involve a serious criminal offence.
- A referral would be contrary to the wishes of the pupil complainant who is of sufficient maturity and understanding and properly informed, or is contrary to the wishes of the complainant's parents (not involving them as perpetrators)
- The case is one that could be satisfactorily investigated and dealt with under the School's internal procedures, the parents being kept fully informed, as appropriate.

If the child is deemed to be 'in need', the DSL will discuss with children's services whether to begin early intervention and support using the Common Assessment Framework (or local version if outside Hertfordshire).

If the child is deemed to be 'at risk', the DSL will make a referral under Section 47 of the Children's Act immediately.

## **External agencies**

Whether or not the School decides to refer a particular complaint to the LADO or the police, the parents and pupil will be informed of their right to make their own complaint or referral and will be provided with the appropriate contact details.

## **Mental Health**

All staff should recognise that poor mental health can, in some cases, be an indicator that a child has suffered from or is at risk of suffering abuse, neglect or exploitation. Key pastoral staff (e.g. tutors or classroom teachers) are in an excellent position to ascertain when the mental health of a child has changed. They should not attempt a mental health diagnosis and must be careful in the use of any specific language used in dialogue with the pupil, such as the term "depression". All children thought to be suffering from poor mental health, persistent low mood and/or poor self-esteem should be referred via MyConcern to the Housemaster/Mistress (in the Senior School) or Head or Deputy (in the Prep School). They will then liaise with the School Counsellor who will perform an initial diagnosis or will refer to external agencies such as CAMHS for advice. In an emergency, the child should be

referred directly to the DSL, who will arrange with the Health Centre for emergency care to be provided. In addition, any suspected or disclosed incidents of self-harm should be logged on MyConcern. If pupils require immediate medical attention, the Health Centre must be contacted urgently for assistance.

### **Abuse from the use of Electronic Technology**

The era of greater access to and use of mobile technology and the internet exposes young people to previously unforeseen risks of abuse. Occasions of cyber bullying are increasing through the use of networking sites, such as WhatsApp, Facebook, Instagram, TikTok and Snapchat, and also through text and email messaging. People working with young people need to be aware of the risks posed by the use of such media. School policies on Anti-Bullying and Anti-Cyber Bullying should be adhered to as well as staff adopting safe working practices when considering communicating with pupils electronically.

Our students increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education and have proved to be vital during the COVID-19 lockdown. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The Prevent Duty also requires the School to safeguard vulnerable individuals from being radicalised or drawn into extremism through the internet or social media.

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation; radicalisation; sexual predation - technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material
- Contact: being subjected to harmful online interaction with other users
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.

The School's e-safety policy is incorporated in the Pupil's **Acceptable Use of ICT and Mobile Phone Policy for Pupils** which can be found in the Policies section of MySchoolPortal (<https://af.myschoolportal.co.uk/documents/21>). This explains how we try to keep students safe in School.

Cyber-bullying and sexting by students, via texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our counter-bullying procedures.

Further guidance on keeping children safe online, particularly during online learning, is available in KCSIE (September 2020), Annex C.

See the relevant DfE advice on **Searching, screening and confiscation** <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

The following measures and Policies are in place to promote e-safety within the School:

**Induction and Education:** All pupils are inducted in appropriate use of the School's ICT facilities and other aspects of this policy upon arrival. Subsequently, Teachers/Tutors remind pupils at the start of each academic year about their obligations and code of conduct.

**Monitoring/Filtering:** The School will exercise its right to monitor the use of computer systems, including the monitoring/filtering of internet use, interception of e-mails and the deletion of inappropriate materials at all times.

(Factors considered when putting in place these measures, are set out in **UK Safer Internet Centre: appropriate filtering and monitoring.**

**Follow these links for** Guidance on **e-security** and **buying advice** for schools.)

In circumstances where the School believes unauthorised use of the computer system is, or may be taking place, or the system is, or may be, being used for unlawful purposes, the School reserves the right to inform appropriate authorities and provide documentary evidence.

**Training:** Staff receive advice regarding ICT Code of Conduct, the use of social networking and electronic communication with Pupils. Online safety training is integrated into the regular safeguarding training staff undergo and this forms part of the pupils' Life Matters, PSHE and tutorial programme.

### **Sexting (Youth-produced sexual imagery)**

All staff should be aware safeguarding issues can manifest themselves via use of technology in the form of sexting, often as a form of peer on peer abuse.

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. Many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' (Adolescents and self-taken sexual images. Cooper, Quayle, Jonsson, Svedin, 2014).

Creating and sharing sexual photos and videos of under 18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management. 'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

See the detailed UKCCIS advice on Sexting on the Resources tab of MyConcern.

### **Steps to take when dealing with an incident of sexting:**

For general concern expressed by a pupil about how sexting may affect them or for information only. This should be for cases where the concern expressed is not specific or related to an alleged incident or disclosure. In this case staff should direct pupils to the following government website <https://www.disrespectnobody.co.uk/sexting/what-is-sexting/>

If a disclosure is made about an alleged sexting incident by a pupil the following steps should be taken:

- Follow the steps outlined in 'What to do' for the recording and reporting of any disclosure as outlined in the Summary of the Safeguarding Policy.
- If appropriate and with the pupil's permission, take the mobile phone. **Do not view any content.** Place it face down. Turn it off. Place it in an envelope on which you have written: What the envelope contains, the name of the pupil, the date and time. Ask the pupil to sign the envelope over the seal of the envelope to ensure that it cannot be opened and resealed without anyone knowing about it.

- Hand the mobile phone to the DSL (or in his absence the Deputy Head (Pastoral), the Head of Senior School, the Head of Prep, or the Headmaster) at the same time as you report your concern.

The DSL will deal with the incident using the detailed guidance contained in the UK Council for Child Internet Safety document ‘Sexting in Schools and Colleges’ <https://www.safeguardingschools.co.uk/wp-content/uploads/2016/08/Sexting-in-schools-and-colleges-UKCCIS-August-2016.pdf>

### **Bullying (Peer-on-peer abuse)**

While bullying between children is not a separate category of abuse or neglect, it is a very serious issue that can cause considerable anxiety and distress. All incidences of peer-on-peer abuse should be logged on MyConcern and managed in accordance with the school’s Anti Bullying Policy. If bullying is particularly serious and there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm it could lead to the implementation of child protection procedures.

Staff should recognise that children are capable of abusing their peers. Full reference to this can be found in the School’s Anti-Bullying Policy, which details the following:

- What constitutes peer-on-peer abuse
- How allegations of peer-on-peer abuse will be dealt with
- How victims of peer-on-peer abuse will be supported
- How perpetrators of such abuse will be given support to change their behaviour, in addition to being disciplined as appropriate
- How the risk of peer-on-peer abuse can be minimised.

It is vital that staff are aware of potential incidences of peer-on-peer abuse, which should never be tolerated or passed off as “banter” or “part of growing up”. Although it is generally assumed that peer-on-peer sexual abuse is always perpetrated by a male on a female, staff must be open to the possibility of such abuse being male-on-male, female-on-male (particularly if the girl is older), and female-on-female. Particular care should be taken to ensure that all incidences of online peer-on-peer abuse or sexting are reported to the relevant authorities and not investigated by the school.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse. Any incidents that occur in the boarding setting will be responded to swiftly by the HSM in conjunction with the Deputy Head (Pastoral) and the DSL. A full investigation will establish the facts and, in all cases, the first priority will be the wellbeing of the victim. Immediate measures will be put into place to protect them and sanction and rehabilitate the perpetrators as appropriate, using a restorative justice approach whenever possible.

Peer-on-peer abuse manifests itself particularly where there are minority groups in an organisation. Particular care should be taken to ensure that such groups are protected as far as possible from majority groups (See KCSIE 2020 Annex A.)

### **Information on Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM) and Honour-Based Abuse (HBA)**

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 through the use of technology. (Working Together to Safeguard Children 2018).

Child Criminal Exploitation (CCE) may also occur as a result of an imbalance of power. In addition to age, the imbalance may be due to a range of other factors, including (but not limited to) gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. (KCSIE 2020, Para 28.)

It is important to note that both CSE and CCE may be perpetrated by:

- Groups or individuals
- People of any gender identity
- Children or adults.

Incidents of CSE and CCE must be investigated very carefully, and it must not be assumed that the alleged perpetrator fits the stereotype of a strong male.

Female Genital Mutilation (FGM): 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. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. (Reference: KCSIE September 2020).

So-called 'honour-based' abuse (HBA) 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. All of the above, by definition, constitute abuse, regardless of motivation. If staff have concerns about the possibility of our pupils being subject to HBA these should be reported immediately to the DSL and relevant members of SMT.

If you encounter a case of FGM or have reason to believe that a girl is at risk of FGM you must inform the DSL or SMT immediately.

**All employees of the School have a statutory duty to report cases of FGM involving children directly to the police, rather than via the DSL or Head of School, who should both be informed immediately once a report has been filed. FGM concerns should reported to Hertfordshire Domestic Violence/Abuse helpline on 08088 088 088 or in emergency dial 999. For victims living in London, the Metropolitan Police should be informed on 101.**

## **Sexual Violence and Sexual Harassment**

Sexual violence includes, but is not limited to, rape or assault by penetration by one or more perpetrators against a victim or victims. It can also include intentional touching of a sexual nature where consent has not been freely given. (For further guidance, see KCSIE 2020 Annex A or the DfE's advice paper [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges \(2018\)](#)). Should staff become aware of a sexual assault having taken place, they must inform the DSL or DDSL(s) as a matter of urgency. If a pupil wishes to disclose details of such an assault, this should be done with **at least** two members of staff present, one of whom should be the DSL/DDSL. Every effort should be made to support the victim and to protect the identity of the alleged perpetrator to ensure that legal proceedings can run their course. The SMT will liaise with the Police regarding minimizing the risk of a further assault taking place if the alleged perpetrator is still in school. This will involve conducting a risk assessment.

Sexual harassment includes, but is not limited to, sexual comments, taunting and threatening sexual behaviour. This should be dealt with by the Deputy Head (Pastoral) and a record logged on MyConcern. The victim of harassment will be offered appropriate support, such as counselling.

The issues of sexual violence and sexual harassment will be addressed during Life Matters lessons and in other forums such as assemblies. Staff should make it clear to pupils that such behaviour is **never** acceptable.

## **Upskirting**

“Upskirting typically involves taking a picture under a person’s clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm” (KCSIE Annex A, 2020). Any suspected incidents of upskirting must be reported immediately to the DSL/DDSLs, who will refer the matter to the police as it is a criminal offence. Anyone of any gender can be a victim. Pupils are aware of the seriousness of Upskirting as it is referenced in Appendix 4 of the Acceptable Use of ICT and Mobile Phone Policy for Pupils.

## **Gang Violence**

There are a number of areas in which young people are put at risk by gang activity, both through participation and as victims of gang violence which can be in relation to their peers or to a gang involved adult in their household. A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

For more information on safeguarding children affected by gang violence refer to the following document published by the Home Office.

[‘Preventing Youth Violence and Gang Involvement – Practical Advice for Schools and Colleges’](#)

If you become aware that a pupil is involved in gang activity this should be reported immediately to the DSL who will arrange to meet with HSM, tutor and SMT to decide the best course of action which may involve the police and other outside agencies.

## **County Lines**

Aldenhams proximity to major transport thoroughfares, in addition to the widespread catchment area of its pupils, makes the School a prime target for the organisers of County Lines. Essentially, these involve coercing young people into transporting drugs and other illegal items from urban areas into provincial towns. Staff should be particularly vigilant in monitoring pupils for indicators such as the following:

- Sudden changes in appearance or dress
- Carrying a second mobile phone
- Unusual anxiety when delayed, e.g. to attend a detention
- Unexplained absences, particularly on Mondays and Fridays
- Unexplained injuries

These are just some of the indicators that a child might be involved in County Lines. Further information can be obtained from the Home Office publication [Criminal Exploitation of Children and Vulnerable Adults: County Line Guidance](#). Suspected involvement in County Lines must be reported to the DSL immediately, who will then liaise with appropriate pastoral staff to protect the pupil(s) from harm.

## **Domestic violence**

The issue of children living with domestic violence is now recognised as a matter for concern in its own right by both government and key children’s services agencies. The link between child physical and sexual abuse and domestic violence is high. All the outcomes for children can be adversely affected if they are living with domestic violence and abuse - the impact is usually on every aspect of a child’s life. The impact of domestic violence and abuse on an individual child will vary according to the child’s resilience and the strengths and weaknesses of their particular circumstances.

If staff become aware that a pupil is living with domestic violence the DSL should be made aware and a decision made about the involvement of social services and the Police. Our aim is to work with parents alongside outside agencies in the best interest of the child. The School has the flexibility to provide boarding space for Senior School children who may be particularly vulnerable while outside agencies seek to resolve issues at home. Although the School is not part of *Operation Encompass*, due to its pupils coming from a wide range of different Local Authorities, it will make every effort to liaise closely with the Police and will act immediately on any information being provided by the Police to ensure that a child's welfare is maximised at all times.

**For further information about** safeguarding children affected by domestic abuse and violence published by the LSCB – London Safeguarding Children Board

Refer to the following document: [http://www.londoncp.co.uk/chapters/sg\\_ch\\_dom\\_abuse.html](http://www.londoncp.co.uk/chapters/sg_ch_dom_abuse.html)

## **Impact of abuse**

The impact of abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long term medical or psychiatric difficulties. In addition, their life chances may be severely curtailed due to the impact on their academic progress during the period of abuse.

## **Good practice involves:**

- Treating all pupils with respect
- Setting a good example by conducting ourselves appropriately
- Encouraging positive, respectful and safe behaviour amongst pupils
- Being a good listener
- Being alert to changes in pupils' behaviour
- Recognising the challenging behaviour may be an indicator of abuse
- Reading and understanding the School's Safeguarding Policy and guidance documents on wider safeguarding issues, e.g. bullying, behaviour, code of conduct, restraint,
- Maintaining the appropriate standard of conversation and interaction with and between pupils
- Maintaining professional standards of pastoral care within the context of appropriate professional separation and avoiding the use of sexualised, derogatory or over familiar language in the company of pupils
- Being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse

## **Children who may be particularly vulnerable**

Some children may be at increased risk. Many factors may contribute to this including prejudice, discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

A vulnerable child should not be left on their own or sent back to lessons or sent back to his/her boarding house; you must make arrangements to stay with the child until an initial assessment of the situation has been made by the DSL or, in his/her absence, a DDSL, the Deputy Head (Pastoral), the Head of Senior School, the Head of Prep, or the Headmaster. If lesson cover is needed contact the member of staff in charge of cover.

Any child at the school who is looked after by the Local Authority must have special attention paid to their needs, including ensuring that their learning is managed as effectively as possible.

Any child at the school with special educational needs or who has a disability must have special attention paid to their vulnerabilities.

To ensure all pupils receive equal protection, it is imperative that staff members pay particular attention to the needs of children who are particularly at risk from abuse, for example:

Pupils:

- With Special Educational Needs and disabilities (because they might not have the communication skills necessary to disclose abuse if it occurs);
- Affected by parental substance abuse;
- Who do not have English as their first language;
- Living away from home, in temporary accommodation or have transient lifestyles;
- Who run away or go missing;
- Who are vulnerable to being bullied or engaged in bullying;
- Who are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- At risk of child sexual exploitation (CSE), prostitution or child trafficking;
- At risk of child criminal exploitation (CCE);
- At risk from being brought into County Lines operations; or,
- At risk of forced marriage or female genital mutilation (FGM).

Children with Special Educational Needs and Disabilities (SEND) and those with English as an Additional Language (EAL) are particularly vulnerable and as such can face additional safeguarding challenges. Staff are aware and mindful that additional barriers can exist when recognising abuse and neglect in children with SEND or EAL. Such barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's disability without further exploration.
- Children with SEND or EAL can be disproportionately impacted by things like bullying without outwardly showing any signs or being able to fully express their feelings.
- Communication barriers, such as difficulties in articulating how they have been abused and difficulties in overcoming these barriers.

The school's Anti Bullying, Behaviour, Special Educational Needs and Disabilities, English as an Additional Language and Equal Opportunities policies provide additional information on the strategies adopted.

### **Helping children to keep themselves safe**

Children are taught to understand and manage risk through the school's Life Matters programme, PSHE lessons, assemblies and pastoral input from tutors etc. The School's approach is to help children think about the risks they may encounter and with staff work out how these risks might be overcome. Being taught to manage risk is a valuable part of a child's education. Children are regularly reminded about safety, e-safety and tackling bullying issues. The School promotes an ethos of respect for children and pupils are encouraged to speak to a member of staff if they have concerns about themselves or others.

Child abuse can be devastating for the child and very distressful for the staff who become involved. The School will support pupils, families and staff by:

- Taking all suspicions and disclosures seriously
- Maintaining confidentiality and sharing information on a need to know basis only with relevant agencies and individuals
- Storing records securely
- Offering details of help lines, counselling and other avenues of external support in all Houses and other public areas of the school
- Co-operating fully with relevant statutory agencies

## **Children who run away or go missing**

Occasionally, pupils may run away from home or from a boarding environment. If any pupil goes missing from school, staff should follow the Missing Pupil Policy. However, sometimes the school may become aware that a pupil ran away from home. In such a case:

- The school should work with the Police and parents to give any possible assistance in finding the child – such as contacting known friends and searching school buildings and grounds, particularly boarding houses.
- Assuming the child is found, and irrespective of whether the police were involved, the school should still see such an incident as a possible indicator of abuse or a cry for help.

Using the School's pastoral team (Housemaster/Mistress, Deputy Head (Pastoral), DSL, Deputy Head of Prep and Chaplain as deemed appropriate), the school should gently investigate the reasons for the child running away – using open questions. If further concerns become apparent, or a disclosure is made at this point, the DSL should make the necessary referrals.

Aldenham School will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a **continuous period of 10 school days or more**, at such intervals as are agreed between the school and the local authority. (In default of such agreement, at intervals determined by the Secretary of State) See the School's Missing Pupil Policy.

## **Reporting concerns**

### **Allegations against pupils**

A pupil against whom an allegation of abuse has been made, may be suspended from School during the investigation and the School's policy on behaviour, discipline and sanctions will apply. In the instance where there is an allegation of abuse by one or more pupils against another pupil and there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' then any such abuse will be referred to the HSCP (or the relevant Local Authority) as a child protection concern. The expectation is that in this instance all children involved whether perpetrator or victim will be treated as being 'at risk'.

### **One to one teaching**

Where pupils are engaged in close one-to-one teaching, particularly in art, drama, dance, music or PE/games lessons, the following precautions should be observed: that another member of staff is in reasonably close proximity within the building, lessons take place within normal working hours or if out of hours that a member of SMT is aware. In addition, the activity should be visible (e.g. open doors and curtains etc.) and any physical touch should be minimal, instructive or confined to necessity in order to avoid harm or risk of injury. If it is necessary to touch a pupil to demonstrate a position/move/technique this should be preceded by an explanation of the manner of touching and assent should be sought e.g. 'I'll need to hold your shoulder to demonstrate this position is that OK?' **Colleagues should take every possible precaution to avoid placing themselves at the risk of false allegation.**

### **Suspected harm from outside School**

A member of staff who suspects a child is suffering harm from outside School should seek information from the child with tact and sympathy, using open but not leading questions. A record should be made of the conversation and the matter referred to the DSL or a DDSL if, after the initial conversation, there remains a cause for concern. The School can have a vital role to play in providing information to external agencies in such cases.

## 5. Arrangements for dealing with allegations of abuse against a member of staff, a member of supply staff, or volunteer

### If you have concerns about a colleague

Staff who are concerned about the conduct of a colleague (including a member of supply staff or a volunteer) towards a pupil or pupils are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount and they have an obligation to raise any concerns with the DSL, Head of Senior School, Head of Prep, or Headmaster without delay. Revd Perris should **never** be informed of any such concern, as this will compromise her ability to offer chaplaincy support to the colleague if the issue is investigated.

The School has procedures to deal with allegations of abuse against a member of staff, a member of supply staff, or a volunteer. The starting point for such an investigation should be the School's Low-Level Concerns Policy. This gives details of appropriate thresholds which, when met, constitute abuse. Once it is clear the threshold has been met, the LADO must be contacted immediately. If the threshold has not been met, the procedures detailed in the Low-Level Concerns Policy should be followed. **The key test is whether the colleague has, or may, pose a risk of harm to children.**

Incidents of inappropriate conduct may not necessarily involve children but could have an impact on a colleague's suitability to work with children. For example, if a colleague was the perpetrator of domestic violence against an adult, it could potentially put children in school in danger due to the concept of transferable risk.

The four key unacceptable behaviours outlined in KCSIE (2020) Part Four are, in summary, where a colleague has:

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

The School encourages a 'whistle blowing culture' in this respect and offers consideration of immunity from retribution or disciplinary action when done so in good faith. Ref: *Whistle Blowing Policy*.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School safeguarding regime and that such concerns will be taken seriously by the SMT (Senior School) or SLT (Prep School). In addition, the NSPCC provides a Whistleblowing Advice Line which offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation. <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Local procedures plus the government guidance in *Working Together to Safeguard Children (2018)* and *Keeping Children Safe in Education (2020)* must be followed at all times.

Where an allegation is made against a member of staff (including volunteers, supply staff and the DSL) it must be reported immediately to the Head of Prep, Head of Senior School or Headmaster. Where the allegation is against the Headmaster, the Chairman of Governors must be contacted, **without notifying the Headmaster**, and the Chairman will contact the Local Authority Designated Officer (LADO).

**All allegations should be referred to the LADO for advice before any investigation takes place and within one working day. In case of serious harm, the police should be informed from the outset.**

In order to minimise the risk of harm to children and accusations being made against staff as a result of their daily contact with pupils, Governors should ensure, through the Headmaster that all staff are aware of safe working practice as outlined in the staff Code of Conduct and follow guidelines on their behaviour and actions and the use of control and physical restraint.

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. The School has procedures for dealing with allegations against staff (and volunteers) that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from unfounded or false allegations. These procedures follow the guidance in part 4 of KCSIE 2020.

In addition, staff should understand that under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where the former is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil may be a criminal offence, even if that pupil is over the age of consent. All allegations must be reported straight away.

If an allegation is made against a teacher, the DSL or other member of staff the quick resolution of that allegation should be a clear priority to the benefit of all concerned. (It will be dealt with according to the statutory guidance set out in part 4 of the KCSIE 2020). At any stage of consideration or investigation, all unnecessary delays should be avoided, notwithstanding the principle of due process.

Aldenham will not undertake its own investigation of allegations without prior consultation with the Local Authority Designated Officer (LADO) or in the most serious cases the police, in order not to jeopardise statutory investigations.

This will happen within 24 hours by the DSL/Headmaster or Chair of Governors, Trevor Barton. Aldenham makes every effort to maintain confidentiality and guard against unwanted publicity. The restrictions apply up to the point where the accused person is charged with an offence or the DfE/ Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

In response to an allegation, suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. If suspension is deemed appropriate, the reasons and justification will be recorded by the school and the individual notified of the reasons.

If the LADO or any of the statutory child protection authorities decides to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff, the matter will be dealt with in accordance with the Disciplinary Procedure. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children.

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Notwithstanding this, we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

If the school ceases to use the services of a member of staff (or a Governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the DBS. It is a criminal offence not to report an incident when the criteria have been met. Any such incidents will be followed by a review of the safeguarding procedures within the school with a report being presented to the Governing Body without delay.

Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to and also a referral to the TRA and the Charities Commission. Reasons a referral to TRA would be considered are; “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Advice about whether an allegation against a teacher is sufficiently serious to refer to the NCTL can be found in *Teacher misconduct: the prohibition of teachers* (October 2015) and DBS barring referral guidance 2018. Further guidance is published on the TRA website.

## **Responses of the DSL**

The DSL receiving a report of an allegation by a pupil of abuse shall:

- Take any steps needed to protect any pupil involved from risk of immediate harm.
- Not interview or investigate the allegation further other than to ascertain the basic facts of the case but refer the matter within 24 hours to the HSCP or relevant Local Authority and act on their advice. This may involve inter-agency working and the instigation of a Common Assessment Framework (CAF) or ‘Team around the Family (TAF) approach.
- Although *Working Together* (2018) encourages joint working with parents their consent is not required for referral to statutory authorities and the best interests of the child must be the primary consideration.
- Preserve all evidence (for example, scribbled notes, mobile phones containing text messages, clothing and computers) must be safeguarded and preserved.
- Keep records of all concerns, ensuring that such records are stored securely on MyConcern and are only shared with those who need to know of the concern.

The school keeps a record of any safeguarding incidents and these are kept in locked storage. (Incidents since May 2018 have all been recorded on MyConcern.) The records are kept until the child moves to another school. At this point the records will be passed on to the new school, either via registered post or transfer on MyConcern. Aldenham will record where the records have been sent to and the date it happened. The records of the safeguarding incidents will subsequently be treated in accordance with data protection guidelines.

If a referral has been made and a child has been graded ‘in need’ or early intervention with multiple agencies has begun, the DSL will:

- Inform staff on a ‘need to know’ basis. It would be expected that the child’s Housemaster and key pastoral support staff such as tutors/class teacher and Health Centre staff would be informed and most likely involved in any meetings to support the child. It may be beneficial to inform other teachers as necessary.
- Coordinate CAF or TAF meetings if the School is the lead agency. Attend meetings and report on the School’s behalf if not the lead agency.

If a referral has been made and the child has been graded ‘at risk’, the DSL will:

- Act according to the instructions of Children’s Services or the Police.
- Inform all relevant staff, teachers, Health Centre and others such as secretarial staff who would have regular contact with the child or parents.
- Instruct staff as to what to look out for and how to respond, according to the circumstances of each case. For example, in cases of physical abuse, any new signs of injury, however minor, would need to be reported to the DSL immediately and a new referral made.

## **6. Arrangements to fulfil other safeguarding responsibilities recruitment**

The School has within its Recruitment Policy a commitment to establishing and following safer recruitment procedures. The policy is in line with the guidance contained within the document KCSIE (2020).

The School's procedures include the training in Safer Recruitment for key personnel involved in advertising, interviewing and recruitment. Before taking up a post, all staff and volunteers are required to submit to an enhanced DBS check and also a check on the Children's Barred List and DfE Prohibited List (formally List 99 and POCAL).

Our procedures are in line with the Protections of Freedom Act 2012 and guidance on Disclosure and Barring (June 2018). A copy of the Safeguarding Children Policy and Procedures are part of the recruitment pack sent to prospective applicants and new members of staff are given training in Safeguarding and Child Protection awareness as part of the induction process. Policies are also held on the use of supply and agency personnel and the School's trips policy covers the requirements for monitoring and checking non-school staff accompanying educational visits.

Clear working practice policies are also in place for staff working in sensitive areas and in the boarding houses and the induction period for new staff will make people aware of these policies and how they are to be implemented. Additionally the School has policies covering the use of private cars for the transportation of pupils, a Missing Child Policy, a Whistleblowing Policy, a Behaviour Policy an Administration of Medicine Policy, Lone Worker Policy, a Pupil Search Policy, an Acceptable Use of ICT and Mobile Phones for Pupils Policy and a Health and Safety Policy.

The school has a responsibility to report promptly to the DBS any person (employed, contracted, volunteer or pupil) who has harmed, or poses a risk of harm to a child and who has been removed from working with children, or would have been removed had he or she not left earlier.

### **Training and New Staff Training**

The DSL and DDSLs will undertake appropriate training in child protection and inter-agency working (updated every two years), in addition to being updated on new guidance and procedures via the weekly NSPCC Update Bulletins.

All staff, including the Headmaster, will receive level 1 Safeguarding training every three years, in accordance with HSCP requirements. The entire staff was last trained face-to-face in January 2018. All staff are currently undertaking two online CPD-certified training units on Level 1 Safeguarding and will complete this training by October 2020. New staff, temporary staff (including Supply Staff) and volunteers will be trained either before they start or on their first day (or as soon as possible thereafter) by the DSL or external agency as part of their induction. Staff are reminded annually by the DSL or DDSL about the procedure for child protection and it forms part of the "induction of new staff" programme.

Staff safeguarding training will include reference to dealing with inappropriate relationships – either peer to peer or between pupils and staff, inappropriate use of ICT, staying safe online and how to avoid exploitation via social media. In addition, staff will be provided with guidance on the use of social media in relation to pupils, as contained in the documents 'email guidance for staff' and the 'professional conduct guide'.

Governors will undertake an annual review of the school's Safeguarding policies and procedures and the efficiency with which the related duties have been discharged.

All staff have read and signed the school staff Code of Conduct. Staff read key policies including the Safeguarding and the KCSIE (2020) part 1 (and Annex A for those dealing with admissions or directly with children) at the beginning of each academic year and as part of their induction.

## Monitoring and Evaluation of this Policy

The school monitors and evaluates its child protection policy and procedures through the following activities:

- This policy is updated annually.
- Governors annually review and sign off the policy (see minutes of Governors' meetings).
- Safeguarding Governor Deborah Nicholes meets with the school DSL and Sarah Galpin (DDSL) termly and reviews safeguarding throughout the Aldenham Foundation.
- Safeguarding is an agenda item at every meeting of the Board of Governors and the Education Committee.
- Safeguarding Governor reports annually to the Governors on safeguarding and a detailed minute is recorded.
- The Governors approve the job description for the school's DSL and DDSLs, and ensure that they have sufficient time, funding, supervision and support to perform their duties, including access to appropriate counselling if required.
- The Governors monitor the work of the school (through pastoral work, PSHE etc.) in equipping pupils to reduce risks and keep themselves safe.
- The Governors monitor pastoral care in the school to ensure that staff have the skills, knowledge and understanding necessary to keep children safe (including children who are looked after by a local authority).
- The DSL/DDSLs update the Senior SMT/ Prep SLT on Safeguarding issues at least every half term, and will attend any Senior SMT/ Prep SLT meeting if pressing Safeguarding concerns need to be discussed.
- Senior SMT/ Prep SLT monitor and review safeguarding procedures.
- Staff read the KCSIE (Sept 2020) part 1, Safeguarding, Whistleblowing and Staff Professional Code annually and complete an online assessment to confirm their understanding.
- Attendance data is monitored and reviewed at Senior SMT/ Prep SLT.
- Regularly analyse risk assessments in line with the Health and Safety Policy.
- Incidents of bullying/ racial behaviour incidents are regularly reviewed by the Senior SMT/ Prep SLT.

*This document is to be read in conjunction with the other policies and procedures including KCSIE Part 1 (Sept 2020), the Professional Conduct Guide, Whistleblowing Policy, Anti-bullying and Anti-cyber Bullying policies.*

## Useful contact numbers

Switchboard	01923 858122
James Fowler (Headmaster/CEO (home))	01923 851600
Andy Williams (Head of Senior School)	07971 094903
Vicky Gocher (Head of Prep School)	07793 626777
Philip Green (DSL – Senior School)	07884 585324
Sarah Galpin (DDSL – Prep School)	07990 841294
Emma Murray (DDSL/Deputy Head (Pastoral))	01923 851639
Jos Perris (DDSL/Chaplain to the Foundation)	07557 008543
Health Centre emergencies	07785 303555
Senior School Office (to request emergency cover)	01923 851630
Debbie Love (Counsellor)	07584 131696
Mark Klimt (Independent listener)	0208 207 3789 or 07713 053 576
Hertfordshire MASH	0300 1234 043
Hertfordshire HSCP	01992 588757
Buckinghamshire MASH	01296 383962
Brent MASH	020 8937 4300
Barnet MASH	020 8359 4066
Camden MASH	020 7974 3317
Enfield MASH	0208 379 5555
Haringey MASH	020 8489 4470
Harrow MASH	020 8901 2690
Hillingdon MASH	01895 556633
Islington MASH	0207 527 7400
Westminster MASH	020 7641 4000
Children’s Helpline (ChildLine)	0800 1111
OFSTED	0300 1234 666
The Children’s Commissioner	020 7783 8330
Samaritans National Helpline	116 123
Signpost Young People’s Counselling Service	01923 239495
YC Hertfordshire	0300 123 7538
Watford Sexual Health Clinic	0300 008 5522
CPSLO North Herts (Paula Hayden)	07788 567907
Hertfordshire Targeted Advice Service	01438 737511 or 0300 1234 043
Hertfordshire Domestic Violence/Abuse helpline	08088 088 088 or in emergency 999
The SAFA team (PREVENT Strategy advice)	01707 354556
Hertfordshire LADO: Tony Purvis	07920 283106
Hertfordshire LADO: Yvette Morello	07812 322582
Marrie Moat (Admin)	01992 555420

**Details of all the latest statutory guidance can be found on the resources tab of MyConcern.**

## **Appendix A**

### **Signs and Symptoms of Abuse - General Comments**

Children can be harmed either by deliberate acts or by a failure to provide proper care, or both. Children may suffer neglect, emotional, physical or sexual abuse or a combination of such types of abuse.

Staff should be aware that while abuse of children is more commonly perpetrated by adults, peer abuse can be a safeguarding issue and concerns about bullying or inappropriate behaviour should be referred to both HSM and DSL if any of the elements outlined below are manifested. For more details please refer to the Anti Bullying Policy.

A significant deterioration in a child's mental health could well be an indicator of abuse. Staff should therefore take care to ensure they raise a concern via MyConcern if they are concerned about a pupil's mental health. The DSL will share the concern with the Housemaster/Mistress to ensure that the services of a mental health professional (e.g. the School Counsellor) are engaged. The mental health professional will in turn inform the DSL if abuse in any form is suspected.

### **Neglect**

Neglect refers to 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 for security, love, praise and recognition. Basic needs, such as food, drink and warmth may not be provided. Slowing of growth without a medical cause may be indicative of emotional abuse and occur even when a child is not deprived of food.

### **Emotional Abuse**

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

### **Physical Abuse**

This is 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.

It is important that a professional who sees an injury on a child takes careful note of how the injury allegedly happened, including the informant, the date, time, place, sequence of events, nature of injury etc. The assessment of the plausibility of the explanation should be a medical judgement - other professionals should not make this decision. Although children do have a variety of accidents, the most common types of injury they sustain are usually different from the injuries caused by abuse.

The following situations, in cases of physical injury, should cause concern about the possibility of physical abuse:

- No explanation
- Inappropriate explanation, e.g. description of a minor accident in relation to a major injury
- Different explanations given to different enquirers
- Parents touchy or defensive, compared with genuine accidents when parents are usually distressed and blame themselves
- Delay in seeking treatment
- Child states that a particular adult hurt him, or one parent accuses another

Injuries should be a cause of concern as they indicate the possibility of physical abuse because they fit recognisable patterns (e.g. human hand marks, human bite marks). A list of injury types is listed below.

### **Possible Indicators of Physical Abuse**

- Multiple injuries of various types and ages.
- Bruising and skin marks such as.
- Black eyes – these cannot be caused by a fall on a flat surface; two black eyes are particularly suspect, especially if the lids are swollen and tender or there is no bruise to the nose or forehead
- Bruised ears, sometimes with bleeding.
- Bruises of upper lip, torn frenulum of upper lip and injuries under the tongue.
- Bruising around mouth of child (may have finger bruises: up to three or four on one side and one on the other).
- Flat hand marks, particularly on cheeks, buttocks and lateral thighs.
- Bruises on scalp and "bald patches".
- Finger bruises on shoulders, upper arms or on the trunks or legs of babies.
- Linear marks or bruises - often seen on buttocks or backs of thighs.
- Bruises or weals curving around the body. Sometimes buckle or loop marks noted.
- Bizarre-shaped bruises with sharp borders, e.g. from hairbrush, comb, slipper.
- Bruises on abdomen - unlikely to be accidental.
- Ligature and choke marks - red mark or bruising around wrist, ankles or neck (in the latter area may be due to sudden pulls on tee shirt).
- Bite mark – two crescent shaped marks or bruises. If more than three centimetres apart they may be caused by an adult or older child.
- Human nail marks - these shows piled up skin at the end of the marks and are unlike abrasion from falls on rough surfaces; they may just be linear bruises.

### **Burns**

- Scalds - glove or stocking scalds to hands and/or feet caused by dunking in water.
- Scalded buttocks - children cannot scald their buttocks accidentally without also scalding their feet and leg.
- Splash marks - look at direction of splash to see if it is compatible with story or might indicate hot liquid being thrown at child.
- Cigarette burns - small circular burns most typically on the back of hands or forearms, seen in clusters and often of different ages.
- Contact burns - child held against heaters, iron, cookers. Well demarcated burns following contours of hot objects.

### **Bone and Joint Injuries**

- These can be caused by direct blows, twists (from swinging a child round by one limb) or throwing against hard objects.

## Poisoning

- Non-accidental poisoning should be suspected in bizarre episodes of ill health or unconsciousness or when poisoning involves more than one child.

## 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, upskirting, 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.

Children of all ages, boys and girls, can be victims of sexual abuse. This abuse often comes to light in a veiled way, for children are reluctant to tell. Many kinds of sexual abuse do not leave any signs of physical injury.

- Children may try to tell others that they are being sexually abused. They may do this by hinting in words, play or drawings of sexual activities to "test the waters". If the adult response is empathic they may wish to reveal more, but if the response is angry or evasive, they may remain silent and not try again.
- If a child exhibits several signs or types of behaviour as listed below, or a pattern emerges of when or how a child exhibits such signs, the possibility of sexual abuse should be considered.
- However, it must be emphasised that the behaviour described below are descriptions of some very common conditions of childhood indicating that the child is distressed. Only rarely will they be caused by sexual abuse.

## Possible Indicators of Sexual Abuse

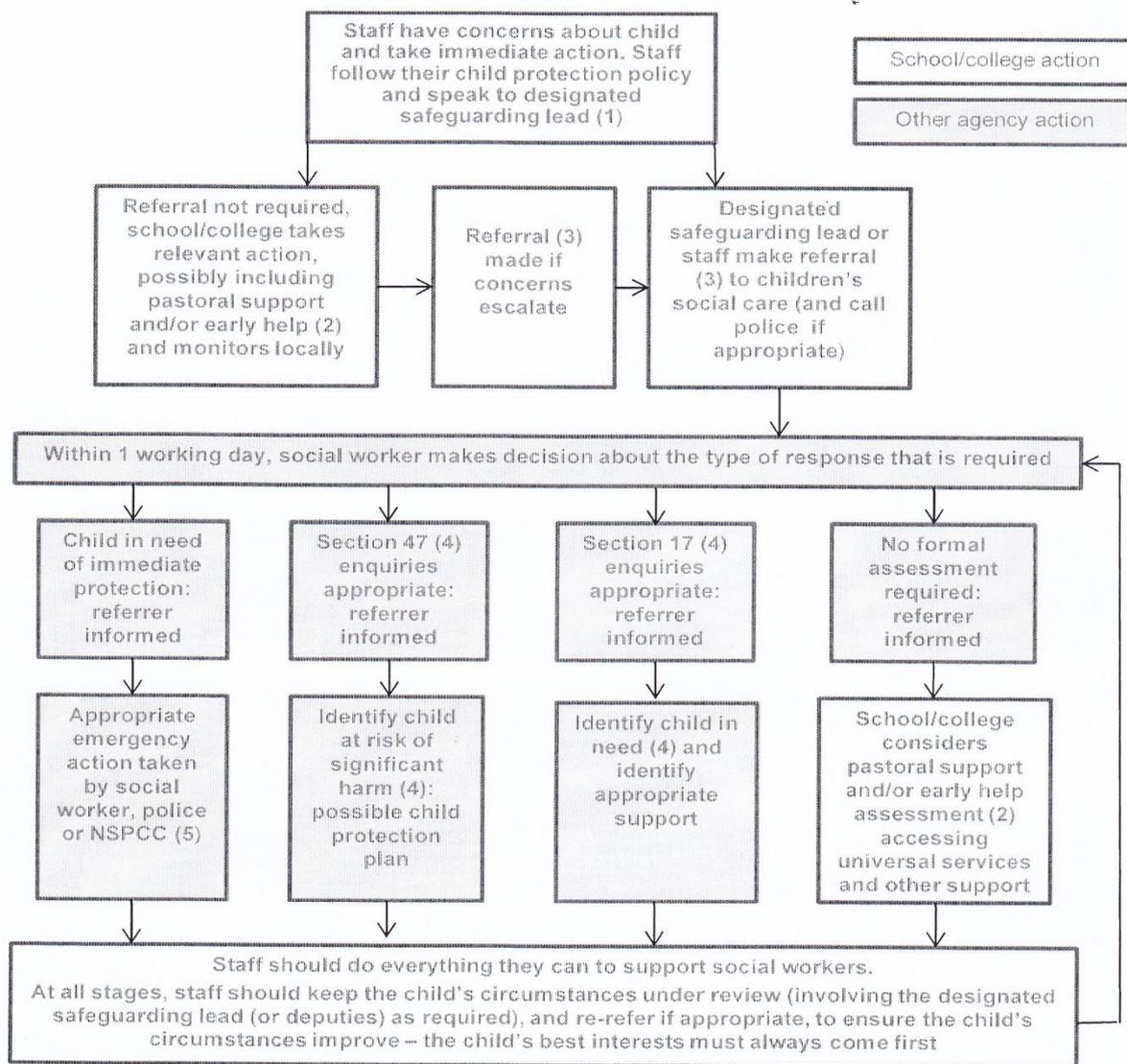
- Sudden change in mood or behaviour.
- Change in eating patterns: loss of appetite, faddiness or excessive preoccupation with food.
- severe sleep disturbance with fears, vivid dreams or nightmares, sometimes with overt or veiled sexual content.
- Withdrawal and depression, learning failure, self-injury, suicidal attempts.
- Temper, aggression, disobedience and attention-seeking, anxiety or restless behaviour.
- Lack of trust in familiar adults.
- Girls take over the mothering role in the family whether or not the mother is present.
- Absconding; requests to leave home.
- Sexualised conduct or inappropriate sexual knowledge in children may be due to direct sexual abuse or other forms of sexual abuse, such as from observing others or watching pornographic videos.
- Continual open masturbation, aggressive, inappropriate and explicit drawing and sex play (masturbation and some exploration are a normal part of growing up, but it is the type and persistence of these activities that cause concern).
- Precocious knowledge of adult sexual behaviour.
- A boy or girl who behaves in a sexually precocious way.
- Requests for contraceptive information. These are rare, but may be a cry for help, as may be anxieties about pregnancy or sexually transmitted disease.
- Inappropriate displays of affection, e.g. parent and child behaving more like lovers.
- Marked fear of men.
- Fear of undressing.

**Some physical conditions may also be indicators of sexual abuse, but not necessarily so:**

- Difficulty in walking or sitting
- Pain on passing water
- Recurrent urine infections
- Soiling
- Recurrent bed wetting

**Appendix B: Flowchart from Keeping Children Safe in Education 2020**

**Actions where there are concerns about a child**



Taken from Keeping Children Safe in Education, September 2020 © Department for Education

## Appendix C

Indicators that children or young people may be vulnerable to or involved with extremism.

### Vulnerability

- Identity Crisis – Distance from cultural/ religious heritage and uncomfortable with their place in the society around them.
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life.
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups.

### Access to extremism / extremist influences

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

### Experiences, Behaviours and Influences

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

## **Travel**

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/young person employed any methods to disguise their true identity? Has the child/young person used documents or cover to support this?

## **Social Factors**

- Does the child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child/ young person experience a lack of meaningful employment appropriate to their skills?
- Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/ young person have any learning difficulties/ mental health support needs?
- Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/ young person have a history of crime, including episodes in prison?
- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child/ young person have insecure, conflicted or absent family relationships?
- Has the child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child/young person's life has extremist view or sympathies?

## **More critical risk factors could include:**

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance and/or behaviour.

**If you have any concerns discuss them with your Safeguarding Lead and local Prevent Officer.**

**Appendix D – example of the form sent to feeder schools prior to a pupil’s transfer to Aldenham**



# Aldenham Foundation

**SAFEGUARDING FORM  
June 2020**

**J. Doe  
01/09/07  
Letchmore Prep School**

- Please tick here if there are no safeguarding concerns for this pupil
  
- Please tick here if safeguarding records exist for this pupil. Please send them for the attention of Revd Philip Green in a sealed envelope marked “Strictly Private and Confidential” as outlined in the established procedures. We use MyConcern Safeguarding Management software, so if your school operates on that platform, please contact me to arrange an electronic transfer of any such files.
  
- Please tick here if you feel that, even if there is not a Child Protection file, a pastoral conversation would be worthwhile. Please ensure that you give me the best contact details so that I can facilitate such a conversation. This will enable us to offer appropriate provision for the pupil from the start of their time at Aldenham.

Signature: .....

Print Name: .....

Position: .....

Phone (direct line/mobile preferred): .....

Best time to contact me: .....

Date: .....

## Appendix E: Designated Safeguarding Lead Job Description

The person appointed to be the Designated Safeguarding Lead (DSL) fulfils a critical role within the life of Aldenham School. The DSL has a key responsibility for overseeing the School's Safeguarding responsibilities and in assuring the Headmaster and the Governors that all is being done to safeguard the welfare of pupils within the School. DfE requirements mandate that there can only be one DSL for the entire School; therefore, the DSL's responsibilities will necessarily include oversight of the Prep School's Safeguarding team.

### Person Specification:

1. To be an approachable and visible member of the school community who is seen by staff as responsible for this crucial area.
2. To be able to demonstrate to staff the importance of safeguarding as a school community and to give them the confidence to be able to exercise their responsibilities appropriately.
3. To have the appropriate seniority within the school to undertake this responsibility with staff, the leadership team, the governors and outside agencies. (DfE requirements mandate that the DSL is a member of the Senior Leadership Team of the School.)
4. To be able to co-ordinate the work of the Safeguarding teams in both the Senior School and the Prep School

### Job Specification:

1. To offer advice, support and expertise of Safeguarding within the School
2. To be a prime and accessible point of contact for any person regarding Child Safeguarding concerns
3. To liaise closely with tutors, HSMs, SMT, parents, the school medical team and school counsellor as appropriate
4. To manage the work Deputy Designated Safeguarding Leads (DDSLs) in both the Senior and Prep Schools and to provide appropriate support as necessary
5. To liaise with the DDSL in the Aldenham Prep School in order to provide coordinated procedures and supportive advice
6. To be available during the School day and whilst any residential trips are in progress during holidays, or to arrange appropriate cover by the DDSLs as necessary
7. To be responsible for coordinating action regarding referrals by liaising with Children's Social Care Services (CSCS) and other relevant agencies
8. To refer immediately to the Head any allegations against a member of staff
9. To refer immediately to the Chair of Governors any allegation against the Head and ensure s/he consults with relevant authorities
10. To communicate with the various Local Authorities in which Aldenham pupils are resident and manage referrals as necessary.
11. To maintain suitable Safeguarding files in accordance with established procedures and to update them when necessary.
12. To manage MyConcern, the School's Safeguarding software package
13. To be responsible for online safety, working with the Head of Technology to ensure that appropriate blocking software is in place and with key pastoral and academic staff to ensure that online safety is taught across the two Schools
14. To liaise with the Admissions Co-ordinator in order to ensure that Safeguarding records are transferred from feeder schools, and to ensure that records of pupils leaving the School are transferred appropriately
15. To coordinate The Common Assessment Framework, ensuring its understanding and appropriate completion by any relevant staff
16. To ensure that all staff have access to and are aware of the Safeguarding policy and procedures, in addition to the latest version of *Keeping Children Safe in Education*. The DSL is also responsible for updating such policies in accordance with any changes in legislation.
17. To ensure that all adults within the school are appropriately trained to statutory requirements using outside providers where appropriate and to liaise with the HR Department to ensure that training records are kept up to date.
18. To lead some training of staff on appointment prior to statutory training being undertaken

19. To ensure that they undertake Safeguarding training to an advanced standard at least every two years
20. To undertake training of pupils with positions of responsibility within the school
21. To ensure that supply staff and volunteers are provided with a summary of disciplinary and child safeguarding procedures
22. To ensure that pupils receive an appropriate level of education in e-safety
23. To refer members of the school community to the Channel programme if there is a concern about radicalisation
24. To refer cases to the Police where a crime may have been committed
25. To support staff who make referrals to relevant authorities
26. To ensure that the DBS, TRA and Charities Commission is informed if a person leaves or is dismissed due to harm (or risk of harm) to a child
27. To liaise on a termly basis with the nominated Governor for Child Safeguarding to monitor procedures and update them on specific issues
28. To assist the nominated governor in preparation of an annual report on Child Safeguarding Procedures
29. To prepare reports for Child Protection Conferences and Core Group meetings and to attend such meetings as necessary

JCF September 2019

## Appendix F: Deputy Designated Safeguarding Lead Job Description

A person appointed to be a Deputy Designated Safeguarding Lead (DDSL) fulfils a very important role within the life of Aldenham School. The DDSL's primary function is to provide cover for the DSL when he/she is not immediately available and to work under the direction of the DSL to ensure that all is being done to safeguard the welfare of pupils within the School. Although a DDSL in the Prep School will manage safeguarding issues on a day-to-day basis, DfE requirements mandate that there can only be one DSL for the entire School; therefore, the ultimate responsibility for the DDSL's actions lie with the DSL.

### Person Specification:

1. To be an approachable and visible member of the school community who is seen by staff as providing expertise in this crucial element of the school.
2. To be in at least a middle management position (or have an equivalent whole-school role) within the school's organisation structure in order to demonstrate an appropriate level of seniority within the school to undertake the responsibilities of providing cover for the DSL.
3. To be an effective team player and to contribute to the wider promotion of good safeguarding practices throughout the school.

### Job Specification:

1. To offer advice, support and expertise of Safeguarding within the School under the direction of the DSL.
2. To cover for the DSL when she/he is not on school premises during the school day, nor easily contactable by other means.
3. To be a point of contact for urgent concerns during periods outside the school day when the DSL is not immediately available, by mutual agreement with the DSL and other DDSLs. (DfE requirements mandate that the DSL or a DDSL should be onsite during the school day, and available during out of school hours, including school holidays when pupils are on residential trips.)
4. To be available as a point of contact for any person regarding Child Safeguarding concerns.
5. To be part of the core welfare team within the school, liaising with HSMs, the school medical team and school counsellor as appropriate.
6. To provide appropriate support as necessary to the DSL in the fulfilment of her/his statutory duties.
7. [For a DDSL working in the Prep School] To advise the DSL of ongoing Safeguarding issues in the Prep School in and to seek support for the resolution of such issues where necessary.
8. To contribute to the production of referrals to Children's Social Care Services (CSCS) and other relevant agencies under the direction of the DSL.
9. To deliver training on Safeguarding issues to colleagues as appropriate.
10. To refer immediately to the DSL any allegations against a member of staff. (Note that DDSLs will **never** be involved in managing allegations against colleagues, unless it is an extreme emergency and the DSL is unavailable.)
11. To ensure that she/he keeps up to date with cases raised on MyConcern, the School's Safeguarding software package.
12. To contribute to the revision of the Safeguarding policy and procedures, in accordance with any changes in legislation and developments in good practice.
13. To establish contact with new colleagues as soon as possible after appointment.
14. To ensure that she/he undertakes Safeguarding training to an advanced standard at least every two years.
15. To keep abreast of current developments in Safeguarding such as by attending relevant training events and reading e-bulletins on a frequent basis.

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