



SAFEGUARDING POLICY INCLUDING EYFS (Child Protection) and Boarding

School update	
Responsible for review of policy	DSL/Deputy Head Pastoral
School Update	September 2025
Governor Sub-Committee review	
Sub Committee to review	Pastoral
Review Period	At least annually but whenever needed to be kept up to date with emergent safeguarding issues.
Last Sub-Committee review date	5th November 2024
Scheduled review	September 2025
Board Approval	
Approved by Board of Governors (Meeting date)	<i>Pending Board Approval October 2025</i>
Related policies	Anti-bullying policy including cyber bullying External Access policy Boarder missing out of school hours Adult partners living in boarding houses Induction of new staff, Governors and volunteers in safeguarding Partners of House Staff Allegations of abuse – staff, volunteer, safeguarding officer or Head Restraint Prevent Self Harm Attendance Recruitment Missing Child Relationships and Sex Education Staff Code of Conduct SEND Mental Health Relational Policy Looked After Children Gender Identity Sharing of nudes/semi-nudes Lower Level Concerns Anti-racism AI policy
Uploaded to Staff Shared	September 2025
Uploaded to Website	September 2025

Introduction

Our Safeguarding Policy is paramount at RMS, reflecting our unwavering commitment to pupil safety. This comprehensive policy is designed to be both informative and easy to navigate, ensuring anyone with concerns can quickly find the information they need, understand the necessary actions, and identify who to contact within RMS or, if necessary, external agencies. It also includes valuable links to governmental and Hertfordshire local authority guidance. All staff, including visiting music teachers, sports coaches, volunteers, and governors, should always refer to their safeguarding information card for key contact details of our designated safeguarding staff (see Appendix 1).

Topic	Page(s):
Designated safeguarding staff and outside safeguarding agencies	4-5
Terminology, abbreviations and website links for further information	6
Policy statement	7
Legislation and guidance	8
Types of abuse and specific safeguarding issues	10
Identifying abuse and indicators	10
Abuse from use of technology (online abuse)	15
Children absent from education	16
Child on Child abuse	17
Sexual violence and sexual harassment between pupils	18
Upskirting	19
Child Sexual Exploitation and Child Criminal exploitation	19
County Lines	20
Forced marriage and honour based violence	20
Female genital mutilation	20
Preventing radicalism	22
Domestic abuse	22
Pupils who may be particularly vulnerable	23
Boarders	24
Disclosure of abuse	25
Referral Guidelines	26

How to respond to concerns - a step by step guide for staff	27
Confidentiality and Secrecy	28
Support for staff	29
Raising awareness and helping children to keep safe	29
Procedures for check staff suitability	30
Induction of new staff	30
Abuse of trust	31
Role of Governance	32
Duties of the School	33
Role of the Designated Safeguarding Lead	34

Appendices:

Appendix No:	Title	Page(s)
1	Safeguarding Card	37
2	Do's and Don'ts for staff	38
3	Misunderstanding of sexual consent - clarification	39
4	RMS logging form	41
5	Advice on dealing with sharing of nudes or semi nudes	47

CONTACTS

The following RMS staff should be your first point of contact should you have any safeguarding concerns regarding a pupil. If you are concerned about a member of staff contact Kevin Carson, Headteacher or Alison Davies, DSL/Deputy Head Pastoral

Name:	Role:	Contact details:
Ms Alison Davies	Designated Safeguarding Lead (DSL), Senior Attendance Champion, Deputy Head, Pastoral	adavies@rmsforgirls.com 01923 773168
Mrs Vicky Greig	Deputy Designated Safeguarding Lead & Head of Ruspini House	vgreig@rmsforgirls.com 01923 725316
Mrs Melanie Horn	Deputy Designated Safeguarding Lead & Head of Cadogan House	mhorn@rmsforgirls.com 01923 725316
Mrs Jo Morris	Deputy Designated Safeguarding Lead & Head of Inclusion at Cadogan House	jmorris@rmsforgirls.com 01923 725316
Miss Jennie Simmonite	Deputy Designated Safeguarding Lead & Deputy Head of Sixth Form	jsimmonite@rmsforgirls.com 01923 725168
Mrs Clare Freeman	Deputy Designated Safeguarding Lead & Head of Sixth Form	cfreeman@rmsforgirls.com 01923 725168
Mr Desmond Cox	Deputy Designated Safeguarding Lead & Deputy Head (Co-Curricular)	dcox@rmsforgirls.com 01923 773168
Mrs Priya Taylor	Operations Manager - safeguarding oversight for outside lettings of RMSNew	ptaylor@rmsforgirls.com 01923 773168
Dr Clare Harrison	Nominated Safeguarding Governor	ch9217@rmsforgirls.com 01923 773168

The following are Hertfordshire and national safeguarding contacts for concerns regarding pupils or about staff:

Local Authority Designated Officer	Safeguarding concerns regarding staff	LADO.Referral@hertfordshire.gov.uk 01992 556372
MASH (Multi Agency Safeguarding Hub)	Safeguarding concerns regarding pupils	protectedreferrals.cs@hertfordshire.gov.uk 0300 123 4043
Herts Professionals Advice Line (CPSLO) Herts	Professional helpline for safeguarding concerns	01438 737511
Virtual School Head Hertfordshire	Educational support for looked after children (CLA)	virtualschool@hertfordshire.gov.uk 01992 556915
Police	Emergencies and potential crimes	999 (in emergencies) 101
Local Authority Channel Referral/ Intervention processes	Radicalisation and terrorism	prevent@herts.pnn.police.uk Anti-terrorist hotline 0800 789 321 DfE dedicated helpline for advice to staff 020 7340 7264 counter.extremism@education.gov.uk
NSPCC	Advice with regards to safeguarding and concerns about staff	NSPCC Whistleblowing hotline help@nspcc.org.uk 0800 800 5000 NSPCC Whistleblowing Advice Line 0800 028 0285
Children's Commissioner, Dame Rachel de Souza	National safeguarding oversight	0800 528 0731 advice.team@childrenscommissioner.gov.uk

TERMINOLOGY, ABBREVIATIONS AND WEBSITE LINKS FOR FURTHER INFORMATION

DBS	Disclosure and Barring Service DBS
DSL	Designated Safeguarding Lead
eCAF	Electronic Common Assessment Framework
EYFS	Early Years Foundation Stage
FGM	Female Genital Mutilation
HCS	Hertfordshire Children's Services HCS
HSCB	Hertfordshire Safeguarding Children Board HSCB
KCSIE	Keeping Children Safe in Education (2025) KCSIE 2025
DO	Designated Officer
MASH	Multi Agency Safeguarding Hub MASH
TRA	Teaching Regulation Agency TRA

School The Royal Masonic School for Girls, including Ruspini, Cadogan House, the Boarding Houses, Senior and Sixth Schools

Staff covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc, and governors

Safeguarding refers to the processes undertaken to protect children from significant harm

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 a form of maltreatment of a child. Abuse may take the form of physical, emotional or sexual abuse and includes neglect. The latter may involve actually inflicting harm, or failing to act to prevent harm. Children may be abused by an adult or adults or by another child or children. Abuse can also take place online.

Policy Statement

At RMS, the safety and welfare of all children, including those in Early Years Foundation Stage (EYFS) and our boarders, is our absolute priority. We are committed to ensuring that all pupils are safe, happy, and thrive, always acting in their best interests and maintaining an environment where all children can learn safely.

Safeguarding and promoting the welfare of children is everyone's responsibility. To fulfill this, all staff must adopt a child-centred approach, consistently considering what is best for each child. As outlined in the Teacher Standards 2014, teachers, including headteachers, are professionally obligated to safeguard children's wellbeing and uphold public trust in the teaching profession. All staff have a responsibility to take appropriate action, collaborating with other services when necessary.

In all child protection matters, the School will follow the procedures laid down by the Hertfordshire Safeguarding Children Partnership, along with Department for Education (DfE) guidance from Working Together to Safeguard Children, Keeping Children Safe in Education (KCSIE) September 2025, Sexual Violence and Sexual Harassment between children in schools and colleges (September 2021), Working Together to Improve Attendance (2023) and the Government's Prevent Strategy. When a safeguarding concern arises, the School will always ensure the pupil's wishes and feelings are considered when determining appropriate actions and services. This policy applies to all pupils, including adult pupils aged 19 and over.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely isolated incidents; multiple issues often overlap. Generally, abuse is defined as a form of maltreatment of a child. This can involve inflicting harm or failing to prevent harm. Children can experience abuse in family, institutional, or community settings, from those they know, or more rarely, from strangers (e.g., via the internet). Abuse can be perpetrated by adults or other children. It is everyone's responsibility to safeguard children; there is no hierarchy. Staff must never assume someone else will take action and must share all information with the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Leads (DDSLs) to ensure children's safety.

The term 'staff' in this policy includes absolutely everyone who has a role at RMS whether this is in a teaching or non teaching role, volunteers, sports coaches, visiting music teachers, governors, gap students and trainee teachers.

All staff must recognise that safeguarding issues can manifest through child-on-child abuse. This most commonly includes, but is not limited to, bullying (including cyberbullying), gender-based violence/sexual assaults, and sexting. All staff must be familiar with RMS policies on bullying and procedures for cyberbullying/sharing nudes and/or semi-nude incidents.

The School recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self blame. The school recognises that a child may not be ready to verbalise any concerns or recognise their experiences are harmful. The School also recognises that pupils may not be ready to disclose or appreciate that they are or have suffered abuse. The School recognises that challenging or withdrawn behaviour may also be a sign of abuse.

Staff recognise the need for a culture of vigilance to be present to support safeguarding. This includes awareness and sensitivity to attitudinal changes in pupils, which may indicate they are at risk of abuse including radicalisation.

We acknowledge that we have pupils over the age of 18, including adult pupils aged 19+, which may present different safeguarding challenges.

Annex B of KCSIE 2025 provides further information on specific forms of abuse and safeguarding issues, including:

- Child Abduction and Community Safety Incidents
- Children and the Court System
- Children Missing from Education
- Children with Family Members in Prison
- Child Criminal Exploitation and Child Sexual Exploitation
- County Lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic Abuse
- Homelessness
- So-called 'Honour Based' Abuse (including FGM and Forced Marriage)
- Forced Marriage
- Preventing Radicalisation (The Prevent Duty, Channel)
- Peer-on-Peer/Child-on-Child Abuse
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges
- Upskirting (Voyeurism)

EYFS

This policy applies to all pupils including EYFS. With specific reference to EYFS and in accordance with the statutory framework for EYFS 2021, staff must refer and adhere to the Mobile Phone and Digital Photography policy which states that staff, visitors, volunteers and students are not permitted to use their own mobile phones or to take or record any images of Foundation Stage children for their own records during session times (with the exceptions specifically listed in the Mobile Phone and Digital Photography Policy). All visitors read this policy as part of the 'signing in' procedure in the Foundation Stage.

This policy is approved and endorsed by the Governing Body and applies to all staff (including governors, sports coaches and visiting music teachers) and volunteers, whether they are with pupils on or off the school site. It covers all pupils, regardless of age, including those aged 19 and over. Parents are informed of this policy and our procedures via the school website.

Legislation and Guidance

To effectively safeguard and promote the welfare of children, RMS adheres to the following key legislation and guidance:

- Keeping Children Safe in Education (KCSIE) September 2025: The Board of Governors ensures all staff understand their responsibilities as outlined in Part 1, and Annex B (for staff working directly with children) or Annex A (for staff not in direct contact with children), as directed. [KCSIE 2025](#)
- Working Together to Safeguard Children (2023) [WTSC](#)
- Statutory Framework for EYFS (2021)
- Prevent Duty Guidance 2023 [Prevent](#)

- Disqualification under the Childcare Act (June 2018)
- What to do if you are worried a child is being abused (March 2015)
- Statutory Guidance issued under Section 29 of the Counter Terrorism and Security Act 2015
- Hertfordshire Safeguarding Children Partnership - Continuum of need for children and young people [Continuum of need for children and young people](#)
- Multi-Agency Practice Guidelines Female Genital Mutilation (2018): Please note, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police if they discover (through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. While it will be rare for teachers to see visual evidence, and they should not be examining pupils, the same definition applies to all professionals subject to this mandatory reporting duty.
- Equal Opportunities Act 2010
- The Children Act 1989 & 2004
- The Sexual Offences Act 2003
- Education Act 2002 (section 175)
- Hertfordshire Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures (Electronic)
- The Education (Pupil Information) (England) Regulations 2008
- The Education (Independent Schools Standards) (England) Regulations 2014
- Voyeuristic (Offences) Act 2019
- Sexual violence and sexual harassment between children in schools and colleges (September 2021)
- Relationships, Sex, Health Education 2025 [RSE](#)
- Working together to improve attendance 2024 [WTIA](#)
- Online Safety Act 2023

AIMS OF THIS POLICY

- To provide a policy which is both informative and user friendly
- to support the health and development of all children in ways that will foster security, confidence and a systematic means of monitoring children known or thought to be at risk of harm, including radicalisation, and ensure that the School contributes to assessments of need that include referral to early help services if they are a child in need of specialist services.
- to provide an environment in which all children and young people, especially those in need of additional support, feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to, regardless of race, gender, sexual orientation, gender reassignment, religion or belief
- to raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of the responsibility of every member of staff whatever their role to identify and report promptly possible cases of abuse, including radicalisation to the relevant agency and to enable everyone to have a clear understanding of how their responsibilities should be carried out.
- to emphasise the need for good levels of communication between all members of staff
- to develop a structured procedure within the School which will be followed by all members of the community in cases of suspected abuse
- to ensure the School has robust systems in place for ensuring that true and accurate records of events are kept and appropriately stored, and to ensure that any such records clearly differentiate between fact and opinion
- to develop and promote effective working relationships with other agencies, especially the Police and Social Care, including Channel in relation to Preventing Terrorism

- to ensure that all staff and volunteers working within RMS have been checked as to their suitability, including verification of their identity, following Safer Recruitment practices (see Recruitment Policy)
- to prevent abuse through the teaching and pastoral support offered to pupils
- to give and maintain support to pupils who may have been abused
- to raise awareness through ongoing training, to include awareness of child sexual exploitation, child criminal exploitation, sexual violence and harassment, radicalisation, forced marriage, honour based violence & female genital mutilation. Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action without delay if such an action is suspected. Staff in direct contact with children receive safeguarding updates at each full staff meeting held half-termly.
- to provide statutory staff training and induction to include a review of the School's Safeguarding Policy & Procedures and to inform staff of the identity of the DSL/DDSL, their obligation to read Part 1 and Annex B of KCSIE 2025 and to inform the School of a change of status in relation to disqualification including by association.
- to advise staff to maintain an attitude of "it could happen here" wherever safeguarding is concerned and always to act in the interests of the child and to emphasise that it 'does happen here'.
- to recognise that 'it will be happening here' even if there are no reported cases.

TYPES OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

RMS recognises various forms of abuse and specific safeguarding issues, and all staff are expected to be aware of them. These include:

- **Emotional Abuse:** Actual or likely persistent or severe psychological ill-treatment. In extreme cases, this can severely impact a child's behaviour, physical development, or mental health. The School addresses this through its thorough well-being approach and Mental Health Policy.
- **Physical Abuse:** Actual or likely physical injury to a child under 18 where there is definite knowledge or reasonable suspicion that the injury was inflicted (or knowingly not prevented) by anyone with care of the child.
- **Sexual Abuse:** Actual or likely occurrence of sexual acts perpetrated upon a child by another person, including acts perpetrated by another child.
- **Sexual Harassment:** Whether child-on-child or from an adult.
- **Neglect:** Actual or likely persistent severe neglect of a child or a failure to protect a child from exposure to any kind of danger, including cold or starvation.
- **Radicalisation and Subjection to Extremist Ideology**
- **Female Genital Mutilation (FGM)**
- **Exploitation**
- **Witnessing Domestic Violence**

Staff should also be aware that behaviors linked to drug taking, alcohol abuse, poor attendance, and sharing nudes or semi-nudes can put children in danger.

IDENTIFYING ABUSE - INDICATORS

Children may indicate that they are being abused in many different ways. Unhappiness and distress can almost always be seen in the behaviour of a young child. Older children may show their distress, but may also be very skilled at hiding it and that boarders can be particularly vulnerable as they are away from home.

All staff also need to be alert to the specific needs of those pupils who have special educational needs and/or disabilities, including young carers. Those with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Those with SEND can be more prone to peer group isolation.

Some of the following signs and types of behaviour might be indicators of abuse or neglect. They are not evidence of abuse and there can be other explanations for a child showing these signs or behaving in these ways:

- children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed
- children with clothes which are ill-fitting and/or dirty
- children with consistently poor hygiene
- children who make strong efforts to avoid specific family members or friends, without an obvious reason
- children who don't want to change clothes in front of others or participate in physical activities
- Children with unexplained bruising or marks
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- children who talk about being left home alone, with inappropriate carers or with strangers
- children who with no medical reason are late to reach developmental milestones, such as learning to speak or walk
- children who are regularly absent from school or education
- children who are reluctant to go home after school
- children with poor school attendance and punctuality, or who are consistently late being picked up
- parents who are dismissive and non-responsive to practitioners' concerns
- parents who collect their children from school when drunk, or under the influence of drugs
- children who drink alcohol regularly from an early age
- children who are concerned for younger siblings without explaining why
- children who talk about running away and
- children who shy away from being touched or flinch at sudden movements
- equally staff are aware that pupils may not be ready to verbalise or they may not realise they are at risk of harm

“Clusters” of signs or behaviour “patterns” emerging over time or inconsistent explanations may alert you to the possibility of abuse.

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.

Neglect

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

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 occur alone. Witnessing domestic violence is also considered abuse.

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

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

Physical Abuse

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

It is important that any member of staff who sees an injury on a child takes careful note of how the injury allegedly happened, including details of 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 – and it is not up to RMS staff to 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, eg 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, especially if they fit recognisable patterns (eg human hand marks, human bite marks). A list of injury types is listed below.

Possible Indicators of Physical Abuse:

Certain types of bruising and skin marks on a child can be highly suspicious for non-accidental injury. It's crucial to understand these indicators as they often suggest abuse rather than accidental harm.

Head and Face

- Black eyes: A single black eye, especially if it's not accompanied by a bruise to the nose or forehead, is suspicious. Two black eyes are particularly concerning, especially if the eyelids are swollen and tender, as these are highly unlikely to be caused by a simple fall on a flat surface.
- Bruised ears: Bruises on the ears, sometimes with bleeding, are uncommon from accidental injury.
- Mouth injuries: Bruises on the upper lip, a torn frenulum (the tissue connecting the lip to the gum) of the upper lip, and injuries under the tongue are all red flags.
- Bruising around the mouth: Bruising around a child's mouth, especially if accompanied by finger bruises (typically three or four on one side and one on the other), can indicate an attempt to silence or force feed the child.
- Scalp bruises and bald patches: Bruises on the scalp or unexplained bald patches can be signs of hair pulling or blunt force trauma.

Body and Limbs

- Flat hand marks: Bruises in the shape of a flat hand, particularly on the cheeks, buttocks, and outer thighs, strongly suggest an open-handed slap.
- Finger bruises: Bruises showing distinct finger marks on the shoulders, upper arms, or on the torso or legs of babies are highly indicative of being grabbed or gripped forcefully.
- Linear marks or bruises: Straight-line bruises, often seen on the buttocks or backs of the thighs, can result from an object like a stick or belt.
- Curved bruises/weals: Bruises or raised marks that curve around the body, sometimes showing buckle or loop marks, are often caused by being hit with a belt or cord.
- Bizarre-shaped bruises: Bruises with unusual shapes and sharp borders, such as those that might come from a hairbrush, comb, or slipper, indicate the use of an object as a weapon.
- Abdominal bruises: Bruises on the abdomen are unlikely to be accidental and should always be investigated thoroughly.
- Ligature and choke marks: Red marks or bruising around the wrists, ankles, or neck suggest restraint or strangulation. In the neck area, these could also result from sudden, forceful pulling on clothing.
- Bite marks: Two crescent-shaped marks or bruises forming a bite pattern. If these marks are more than three centimeters apart, they may have been caused by an adult or older child.
- Human nail marks: These marks show piled-up skin at the end of the marks and are distinct from abrasions caused by falls on rough surfaces. They may also appear as simple linear bruises.

Burns

- Scalds: These are burns caused by hot liquid.
 - "Glove or stocking" scalds happen when hands or feet are submerged in hot water, like a deliberate dunking.
 - Scalded buttocks are highly suspicious. A child cannot accidentally scald their buttocks without also scalding their feet and legs.

- Splash marks can reveal how the burn occurred. Check the direction of the splash to see if it matches the explanation or suggests hot liquid was thrown at the child.
- Cigarette burns: These are small, round burns often found on the backs of hands or forearms. They typically appear in clusters and may be of different ages, indicating repeated injury.
- Contact burns: These occur when a child is held against hot objects like heaters, irons, or cookers. They are often well-defined and match the shape of the hot object.

Bone and Joint Injuries

These injuries can result from:

- Direct blows
- Twisting forces (e.g., from swinging a child by one limb)
- Being thrown against hard objects

Poisoning

Non-accidental poisoning should be suspected if there are:

- Bizarre episodes of illness or unconsciousness
- Cases of poisoning involving more than one child

It is important to remember that the presence of any of the above warrants further investigation by professionals.

Sexual Abuse

- Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- Sexual harassment may also be a form of abuse if it is severe or on-going. It may be peer on peer, or from an adult.
- 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.
- It must be emphasised that the behaviour described below describes 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
- Sexually precocious behaviours
- 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.

ABUSE FROM USE OF TECHNOLOGY (ONLINE ABUSE)

Pupils use mobile phones, tablets, laptops and computers on a daily basis. They are a source of fun, entertainment, communication and education. 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 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. Child sexual exploitation; radicalisation; sexual predation- technology often provides the platform that facilitates harm. An effective approach to online safety empowers the School to protect and educate the whole 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 four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material for example pornography, racism, misogyny, self harm, suicide, anti-semitism, radicalisation, extremism, misinformation, disformation (including fake news) and conspiracy theories
- Contact: being subjected to harmful online interaction with other users for example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm for example making, sending or receiving explicit images and online bullying
- Commerce: being at risk from online gambling, inappropriate advertising, phishing or financial scams.

Cyber-bullying and sharing of nudes or semi nude by students, via social media, texts and emails, will be treated as seriously as any other bullying-type behaviour and will be managed through our counter-bullying procedures. (See also the Policy on Sharing of Nudes or Semi Nude including Guidance for Staff) and advice in appendix 5.

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

Induction and Education: all pupils and staff are inducted in appropriate use of the School's IT facilities and other aspects of this policy upon arrival and are updated in Lifeskills and Computer Science lessons.

Monitoring/Filtering: RMS uses Smoothwall software to appropriately filter and monitor pupils online whilst on the school premises including boarding and DSL and Head of IT regularly review the effectiveness of this system. Staff have an awareness and understanding of this provision. The Heads of Year, DSL and Head of Cadogan manage the system effectively and know how to escalate concerns as necessary. The DSL has overall responsibility in this respect.

Generative AI: The School's approach to the use of teacher and pupil-facing generative AI is detailed in the Use of AI policy and follows the guidance Generative AI: product safety expectations (DfE January 2025). Staff are trained on the risks associated with the use of generative AI and safeguarding pupils is the priority when deciding whether to use generative AI in the school setting or when dealing with unauthorised use by staff or pupils. The School's filtering and monitoring systems cover generative AI and the Pastoral Curriculum is used to educate pupils on the benefits and risks of AI.

*(Factors considered when putting in place these measures, are set out in **the Government document 'Meeting digital & technology standards in schools and colleges (March 2023)'** [Digital Standards](#)*

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.

CHILDREN ABSENT FROM EDUCATION

A child absent from education is a potential indicator of abuse or neglect. School staff members should be vigilant regarding attendance and follow procedures for dealing with children who are absent from education, particularly on repeat occasions, to help identify the

risk of abuse and neglect including sexual abuse, exploitation or radicalisation and to help prevent the risks of them being absent in future. The School follows procedures so that the local authority is informed if a pupil has been absent for a period of ten school days or more or two days if on a Child Protection Plan without permission. The local authority is provided with all details on changes to the admission register.

If a child is unwell, parents should email the School before 8.00am on the first day of absence. The dedicated pupil absence email is absence@rmsforgirls.com. Parents are required to give a written explanation for their child's absence. The School will always contact home on the first day of an unexplained absence in order to make sure that the pupil has not suffered an accident.

Form tutors monitor absence carefully. Where an absence is of 3 consecutive school days or amounts to 3 days in a term and/or where there is a pattern of absence, the matter is referred to the Head of Year. Contact with parents will be made. For an absence of 10 consecutive school days medical evidence (e.g. GP's letter, hospital appointment card) is required by the School and should be sent to the Head. If a pupil has irregular attendance or is absent continuously without authorisation for ten school days, RMS will follow Herts guidelines and notify their local ISL Attendance Team. If a pupil is ill for 15 days whether concurrently or not in an academic year, the local authority is informed.

<http://www.thegrid.org.uk/leadership/isl/contacts.shtml>
The DSL is the Senior Attendance Champion (SAC).

CHILD ON CHILD ABUSE

Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

If a child causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

- whether there is a large difference in power between the young people concerned or
- whether the perpetrator has repeatedly tried to harm one or more other children
- whether there are concerns about the intentions of the alleged perpetrator

Sharing of nudes or semi nude photographs is recognised as a growing risk to young people and RMS raises awareness of this issue in the Lifeskills programme for parents and pupils. (See Policy on Sharing of Nudes or Semi Nudes including Guidance for Staff)

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.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the HCSP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the HCSP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the HCSP or police as appropriate. Victims and perpetrators of child on child abuse will be offered support by the School, as appropriate.

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN IN SCHOOLS

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) also attends RMS. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. We recognise that some pupils may not recognise that they are being abused.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND), LGBT and those pupils that board are at greater risk. Staff should be aware of the importance of:

- having a zero tolerance with regards to sexual violence and harassment
- challenging inappropriate behaviours
- making clear that sexual violence and sexual harassment is not acceptable
- will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- Dismissing or tolerating such behaviours risks normalising them
- Recognise that there may be a difference in approach if a pupil is over 18. This includes adult pupils who are aged 19+.

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of RMS. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003.

Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated,

degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as, telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
- sharing of unwanted explicit content
- upskirting (is a criminal offence under the Voyeurism Act 2019)
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media; on sexual exploitation; coercion and threats.

UPSKIRTING

The Voyeurism (Offences) Act 2019 which is better known as the Upskirting Act and is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and 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. It is a criminal offence. Anyone of any sex, can be a victim

CHILD SEXUAL EXPLOITATION (CSE) and CHILD CRIMINAL EXPLOITATION (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (trafficking) for the purpose of exploitation.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual or criminal exploitation.

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs and alcohol
- go missing for periods of time or regularly come home late
- regularly miss school or education or do not take part in education

Some additional specific indicators that may be present in CSE are: have older boyfriends or girlfriends;

- suffer from sexually transmitted infections
- display sexual behaviours beyond expected sexual development
- pregnancy

COUNTY LINES

County lines County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

The indications of a child involved in County Lines are similar to those detailed above for CSE and CCE but specifically for County Lines, it could include:

- going missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

FORCED MARRIAGE (FM) AND HONOUR BASED VIOLENCE

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviour. School staff should never attempt to intervene directly. Since 2023, the legal age for marriage is 18 rather than previously 16 with parental consent.

FEMALE GENITAL MUTILATION (FGM)

In line with the Hertfordshire Safeguarding Children Partnership (HSCP) FGM policy we recognise that whilst there is not necessarily an intent to harm a girl/ young woman through FGM, the practice has serious short and long term medical and psychological implications and as a school we need to work with partner agencies to promote understanding and safeguard families who may be at risk of this practice. We also recognise that the practice of FGM in the UK is a criminal offence.

Female Genital Mutilation is a form of child abuse and this section of the policy gives depth to our understanding of the issues and our duty of care if we believe a child is at risk of, or has had, any form of FGM performed on her.

The School aims to work sensitively with community groups where this may be a cultural belief and practice to educate and inform. The welfare of the child is paramount, however and the School will act to safeguard and promote our students’ welfare.

• Definition of FGM

The School uses the World Health Organisation definition as written below: ‘comprises all procedures (not operations) that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons’. (WHO-2

“FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practised on a child it is a violation of the child’s right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child.”

UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women. The School embraces the fact that we live in a multi-cultural society but there are some practices which are permitted in other parts of the world which are against the law in the United Kingdom. The practice of female genital mutilation is one of these.

Staff knowledge and training:

- FGM training has been undertaken by the Designated Safeguarding Lead and all staff.
- Staff are aware of their responsibility to escalate any concerns, where they believe a child may be at risk of FGM to the Designated Safeguarding Lead. Staff are also aware they must refer the matter directly to the Police if they believe a criminal act has been committed and a child has been subject to FGM. (Herts Police: Dial 101).
- Staff are aware of the need to take timely and appropriate action in respect of concerns.
- Staff have been advised of the need to challenge requests from families for extensions to holiday times and to report changes in patterns of behaviour if a child is taken out of the country.
- The Designated Safeguarding Lead will keep an open dialogue on the topic of FGM (ensuring this is done in an age appropriate way) with students and parents from practising communities who may be at risk.
- The Life Skills and Relationship and Sex Education programme is tailored appropriately to each age group, to ensure all pupils understand the risks and their rights in respect of their own bodies.
- Staff are alert to possible indicators that a child is at risk of FGM:
 - the family comes from a community that is known to practise FGM – especially if there are elderly women present
 - in conversation a child may talk about FGM
 - a child may express anxiety about a special ceremony
 - the child may talk or have anxieties about forthcoming holidays to their country of origin.
- The DSL will refer all concerns in relation to possible or actual FGM via the First Response Team. In the event of information coming to the attention of the DSL that there is an immediate threat to the child or it is believed there is a flight risk or a criminal offence has taken place, the DSL will refer immediately and directly to the Police.

- Referral to the Herts Children Services (Tel: 0300 123 4043) will be made verbally in the first instance and followed up within 24 hours with a written account using the Referral Form following the usual CP procedures.

PREVENTING RADICALISATION

RMS staff must be alert to the possibility of pupils becoming radicalised and exposed to subversive organisations and must report concerns immediately to the DSL/DDSL (see separate Prevent Policy and Protocol on Visiting Speakers) or direct to Local Authority Channel Referral and Intervention processes.

The School recognises the young minds of our pupils can be vulnerable and exploited by others; staff will be alert to the signs of vulnerability and/or susceptibilities to violent extremism or indoctrination. The School plays a significant part in the prevention of harm by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection. This includes the emotional wellbeing of pupils and thus the School plays a vital role in recognising and preventing the political indoctrination of pupils either by self-radicalisation or through exposure to extremist views.

Signs to watch for:

- growing social isolation
- feelings of grievance and injustice
- cutting off from former friendship groups, change of dress
- feeling under threat
- change of social activities to a narrow focus
- a need for identity, meaning and belonging
- greater time spent online
- a desire for status
- a desire for excitement and adventure
- a need to dominate and control others
- a desire for political or moral change expressed in extreme language
- family or friends involvement in extremism
- mental health issues
- development of 'Them and Us' thinking and dehumanising of a perceived 'enemy' by using derogatory terms

DOMESTIC ABUSE

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. RMS recognises that anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home and online.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. At RMS we recognise experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'.

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.

Child abuse can be devastating for the child and very distressing 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
- co-operating fully with relevant statutory agencies.

Good practice involves:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- encouraging positive, respectful and safe behaviour amongst pupils
- making clear there is zero tolerance for abuse
- effectively assessing the need for early intervention
- being a good listener
- being alert to changes in pupils' behaviour and demonstrating appropriate professional curiosity
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the School's Safeguarding Policy and guidance documents on wider safeguarding issues,
- 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.
- being part of Operation Encompass.

PUPILS WHO MAY BE PARTICULARLY VULNERABLE

- Some children may be at increased risk and additional barriers can exist when recognising abuse or neglect in this group of children. 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.
-
- To ensure all pupils receive equal protection, the School pays particular attention to the needs of children who for example:
 - o are disabled or have Special Educational Needs (SENs)
 - o identify as LGBTQ+
 - o Boarders (see below)
 - o are living in challenging family circumstances e.g. domestic violence, substance abuse, adult mental health

- o do not have English as their first language
- o are living away from home, in temporary accommodation or have transient lifestyles
- o who run away or go missing
- o are vulnerable to being bullied or engaged in bullying
- o are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- o is in care or has returned home from care
- o are showing signs of engaging in antisocial behaviour
- o are at risk of forced marriage or female genital mutilation (FGM)
- o are showing early signs of neglect

BOARDING

The School has had regard to the National Minimum Standards for Boarding Schools (NMS) when drawing up its safeguarding arrangements to safeguard and promote the welfare of pupils and ensures that its safer recruitment procedures are adopted in line with regulatory requirements. This includes drawing up a written risk assessment policy and taking appropriate action in light of any identified risks to the welfare of pupils. We recognise that there are additional vulnerabilities of international boarders for example language and cultural barriers and being a substantial distance from their home.

The policies and procedures outlined in this document are applicable to boarding pupils and meet NMSB (2022).

A DBS check is completed for all persons over 16 (not on the roll of the school) who after April 2002 began to live on the same premises as the boarders but are not employed by the school. RMS uses one taxi firm who undertake DBS checks.

Any adults entering the boarding house other than staff (including visitors, delivery and maintenance personnel) are sufficiently supervised by staff to prevent them from gaining substantial unsupervised access to boarders or their accommodation.

We recommend that all guardians must be over the age of 25 and reside in the UK. Names of Guardian agencies are given to parents when registering their child with the school. The school does not however recommend agencies.

No guardians are appointed by the school; this is the responsibility of the parents.

The Boarders handbook identifies at least one person other than a parent, outside the boarding and teaching staff of the school, who pupils may contact directly about personal problems or concerns at school. Guidance on behaviour and relationships within boarding can be found in the pupil boarding handbook. Where suspected abuse or allegations of abuse have occurred staff will follow the guidelines in this policy. Relationships of all pupils are monitored carefully, with particular regard to boarder. A summarised version of this information is up in the boarding houses on notice boards as well, so pupils know who the person is and how to contact them. The pupils are also provided with appropriate helplines (Childline and NSPCC) and outside contact numbers, including the Children's Commissioner for England, to ring in case of problems or distress.

One of our school counsellors is specifically employed for boarders and is able to see boarders outside of school hours, Tuesdays 4-7pm.

All boarding staff, adults and senior boarding pupils given positions of responsibility (e.g. Head of Boarders) over other pupils will be given copies of this and will be advised on appropriate action to take should they receive any allegations of abuse.

Any boarder found to be missing will be dealt with according to the school's Missing Pupil Policy

Concerns or allegations will be reported to Ofsted and/or ISI

Any boarding member of staff suspended on account of an allegation will be offered alternative accommodation off-site.

The housemistress for Connaught (6th formers) has an added responsibility for being a point of contact for those pupils who are over 18 years of age or adult pupils aged 19+.

DISCLOSURE OF ABUSE FROM ONE OR MORE PUPILS AGAINST ANOTHER

In the event that one pupil makes a disclosure about another pupil the general principles of listening and reporting to the DSL remain the same. All children involved, whether perpetrator or victim, are treated as "at risk". Advice will be sought from Herts Children's Services before proceeding further, for instance, to discuss the incident with the parent of the abused child. At all stages the guidance of Herts Children's Services must be followed. In the case of peer abuse, all children involved will be considered at risk.

Many factors could lead to one pupil abusing another and RMS recognises that they themselves are being abused. It is vital therefore that each disclosure be treated purely on the facts and no one prescribed solution can be seen as a best fit. The reporting arrangements, including contact with a welfare agency within 24 hours of a disclosure of abuse, are the same as for any case of abuse.

DISCLOSURE OR SUSPICION OF AN ABUSED CHILD

Disclosure may take place at any time of the day or night and members of staff need to be aware of procedures, the limits on confidentiality (which if improperly applied may amount to collusion), and who to approach for support (see Appendix 2 Do's and Don'ts).

Given that children are regularly let down by many adults whom they approach to speak to about abuse (one claim is that, on average, seven people fail to listen before the eighth person approached finally steps up to the plate for the child), it is important that absolutely nobody who works in schools is allowed to imagine they are excused any part of the responsibility to meet the needs of a child who might approach them to make a disclosure. The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

School trips: where a member of staff is made aware of possible abuse during the course of a trip away from school, then the Head or a member of SLT on overnight duty or Head of Cadogan House should be informed as soon as possible. It should not be left until the group returns to school.

Disclosure of abuse by a pupil to any member of staff or suspicion of abuse or concern about a child's care must be dealt with immediately. There are strict procedures to be

followed and the time element is important. The DSL must be informed straight away regardless of the time during the day or night.

Notwithstanding our reporting and support mechanisms here at RMS, we recognise that abuse still could be taking place

REFERRAL GUIDELINES

The School distinguishes between safeguarding children who have suffered or are likely to suffer significant harm and those in need of additional early help support from one or more agencies. The former are referred to Herts Children's Services (or the Children's Services where the child lives) immediately and the latter receive inter agency assessment using either a single service or integrated service request. Pupils over the age of 18, including adult pupils who are aged 19+, may be referred to the Adult services including Adult mental health teams.

In the latter case, we understand that early help assessments involve the child and family and the support of professional agencies. If parents or child do not consent, advice will be taken on a referral to children's services.

Advice is always taken regarding informing parents of the referral. Parental consent is not required if there is any concern that a child is at risk of significant harm, or would a child at increased risk or it would impede a criminal investigation.

Any member of staff can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration, for example if the staff member feels that action is too slow or inadequate. Concerns should always lead to help for the child at some point as the priority is to remain child- centred.

In the case of pupils identified as at risk of radicalisation, the School will consider the level of risk to identify the most appropriate referral which could include Channel or HCS.

Particular attention will be paid to the attendance and development of any child about whom the School has concerns, or who has been identified as being the subject of a Child Protection Plan and a written record will be kept.

Allegations against anyone working or volunteering at the School must be referred to the LADO within 24 hours of the referral being made. (Refer to Policy on Allegations of Abuse Against a Member of Staff or Volunteer).

If a crime may have been committed or a case of significant harm, it should be reported to the police.

In the following circumstances the DSL will take advice from the LADO (or consult their guidelines) 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, and contrary to the wishes of the complainant's parents; and
- the case is one that can be satisfactorily investigated and dealt with under the School's internal procedures, the parents being kept fully informed, as appropriate.

However if, during the course of the internal procedures, it appears that the situation is more serious the DSL will again consider whether a referral should be made.

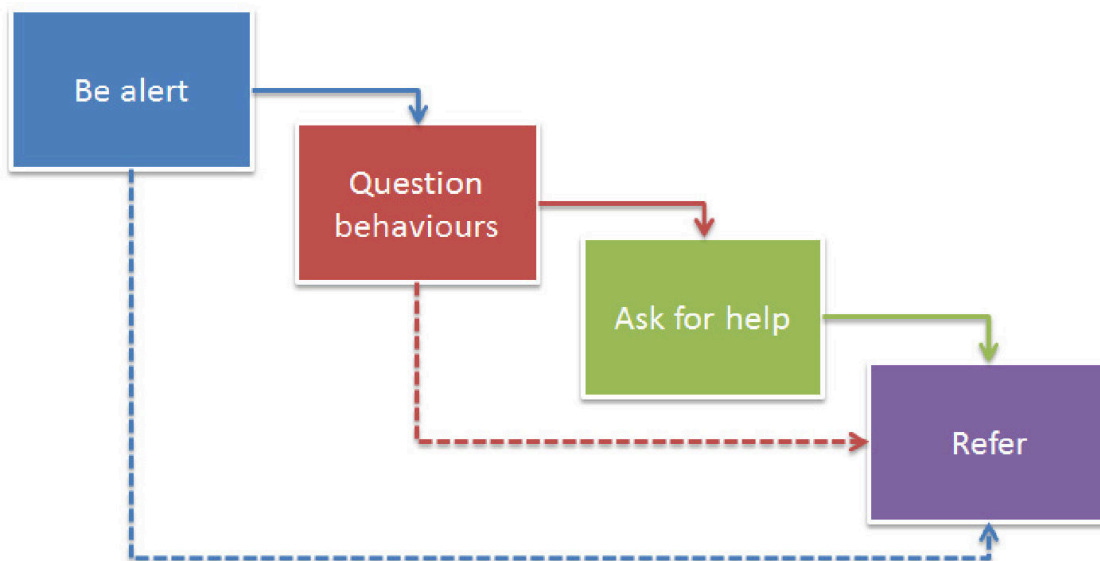
HOW TO RESPOND TO CONCERNS - A STEP BY STEP GUIDE FOR STAFF

Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse, which may involve abuse by another pupil.

- Reassure that they are being taken seriously and that they will be supported and kept safe
- Do not give the impression that they are creating a problem by reporting
- Do not let the pupil be made to feel ashamed for making a report.
- Do not promise confidentiality or secrecy
- Explain the difference between confidentiality and secrecy
- Listen to what is being said without displaying shock or disbelief
- Accept what is being said and do not ask leading questions
- Allow the child to talk freely
- Reassure the child, but not make promises which it might not be possible to keep and do not promise confidentiality or secrecy
- Reassure the child that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Do not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Listen, only asking questions to clarify
- Make a written record (see below)
- Pass the information to the DSL without delay
- Remember this policy applies to pupils under and over 18, this includes adult pupils who are aged 19+

Write notes of what is being said as these will help later if you have to remember exactly what was said and keep your original notes. Do not destroy them, however rough and even if you wrote on the back of something else. It's what you wrote at the time that may be important later - not a tidier and improved version you wrote up afterward. If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards using the record of concern sheet. Notes should be a clear, precise, factual account of the observations.

- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child.
- Draw a diagram to indicate the position of any bruising or other injury.
- Record statements and observations rather than interpretations or assumptions. All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer. Records are kept, by the DSL, in a designated file separate from the child's academic records and in a secure place.
- Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people or making your own enquiries. HCS and police are the people trained to do this. You could cause more damage to the pupil and potentially damage possible criminal proceedings.
- There are four key steps to follow to help you to identify and respond appropriately to possible abuse and/or neglect.



- It may not always be appropriate to go through all four stages sequentially. **If a child is in immediate danger or is at risk of harm, you should refer to children's social care and/or the police.** Before doing so, you should try to establish the basic facts. However, it will be the role of social workers and the police to investigate cases and make a judgement on whether there should be a statutory intervention and/or a criminal investigation.
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- You should record, in writing, all concerns and discussions about a child's welfare, the decisions made and the reasons for those decisions.

CONFIDENTIALITY AND SECRECY

The School's Confidentiality Policy guides all members of the school community.

Safeguarding children raises issues of confidentiality which must be clearly understood by all staff/volunteers in school. Staff and pupils should be made aware of the difference between confidentiality and secrecy.

All staff have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police)

If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the adult tells the child in a manner appropriate to the child's age and understanding that they cannot promise confidentiality and that they may need to pass on the information to other professionals in the best interests of the child and to keep the child safe.

Staff/volunteers who receive information about children and their families in the course of their work should share that information only in appropriate professional contexts (see Confidentiality Policy).

SUPPORT FOR STAFF

Dealing with a disclosure from a child, and a child protection case in general, is likely to be a stressful experience. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the Designated Safeguarding Lead who may refer the colleague to one of the School Counsellors.

RAISING AWARENESS AND HELPING CHILDREN TO KEEP SAFE

The School prides itself on its culture of open and effective communication between staff and pupils, where children are listened to and on its excellent pastoral support structures. The School prepares all pupils to make reasoned, informed choices, judgments and decisions. Time is allocated in Life Skills and form/house time for discussion of safeguarding issues, including radicalisation and in developing in pupils the confidence, which they require to recognise abuse and to stay safe including from online abuse and bullying. The DSL undertakes assemblies for each year group on safeguarding generally in an age specific way and the assembly schedule includes assemblies on anti-bullying, internet safety as well as LGBTQ+ related topics.

The School will endeavour to support the pupil through:

- The content of the curriculum to encourage self-esteem and self-motivation
- The School ethos which (i) promotes a positive, supportive and secure environment (ii) gives pupils a sense of being valued
- The School's relational policy, which is aimed at supporting vulnerable pupils in the School. All staff will agree on a consistent approach which focuses on the behaviour involved but does not damage the pupil's sense of self-worth. The School will endeavour to ensure that the pupil knows that some behaviour is unacceptable but that they are valued
- Liaison with other agencies who support the student
- Pupils are taught to understand and manage risk through the School's Life Skills programme, 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 e-safety including the dangers posed by sharing nudes and/or semi-nudes and tackling bullying issues. The School promotes an ethos of mutual respect and pupils are taught to speak to a member of staff if they have concerns about themselves or others. Pupils also have access to the Wellbeing Hub for sources of information. Pupils from Years 5-13 are also able to undertake a weekly wellbeing check in via Smoothwall Pulse, this is monitored by form the relevant pastoral team. Any concerns are monitored and followed up. This system is particularly useful for those pupils who are less comfortable with speaking to an adult or friend and like the discreteness of Smoothwall Pulse.
- All pupils know that there are adults to whom they can turn if they are worried, including the School Counsellors and Health Centre Staff as well as outside agencies. Classrooms, Health Centre and all boarding houses display advice on where pupils can seek help. This knowledge is checked through pupil surveys.
- The School operates an anti-bullying ambassador programme, whereby trained older pupils are encouraged to offer advice and support to younger pupils
- The School provides leadership training to Sixth Formers and prefects, Heads of Houses, and senior pupils, which specifically covers the importance of offering support and assistance to younger and to vulnerable pupils

PROCEDURES TO CHECK STAFF SUITABILITY

(See Recruitment Policy)

- The School has a commitment to Safe Recruitment, Selection and Vetting and practises safe recruitment procedures according to its Recruitment Policy. A trained member of staff sits on each recruitment panel and renews training every three years. The School takes all possible steps to ensure that unsuitable people are prevented from working with children through its recruitment practices, DBS checks and Induction procedures, including legislation.
- All members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are checked with the Disclosure and Barring Service before starting work. All Governors, volunteer helpers and peripatetic staff working regularly during term-time such as contract staff are also vetted. Appropriate checks are also made on residential centres used by RMS for educational visits. All new staff must read and sign to confirm that they have read Part 1 of KCSIE (September 2025) and Annex B if they work directly with children and the relevant school policies listed in our Induction of New Staff in Safeguarding policy.
- Any staff member who is aware of anything that may affect their suitability to work with children must notify the DSL immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings they may receive.
- The School ensures an individual is treated as unchecked until the original disclosure certificate has been seen by the School. An individual may start work but this is at the Head's discretion (having checked the barred list) and subject to appropriate controlled safeguarding arrangements being put in place which are reviewed every 2 weeks. The individual is informed of the safeguarding arrangements and must have made the DBS application in advance. The School does not confirm the appointment until the School has seen the original disclosure certificate.

INDUCTION OF NEW STAFF

- Before starting work at RMS all new staff undertake courses in safeguarding (KCSIE), child exploitation, FGM, role of DSL and the Prevent Strategy. All new staff receive safeguarding induction training, which includes going through:
- the School's safeguarding policies and procedures including responsibilities in being alert to signs of abuse and how to respond to a disclosure including peer on peer abuse, online abuse, Recruitment Policy and HSCB procedures
- the staff code of conduct/behaviour policy including e-safety and social media
- the identity of the DSL/DDSLs
- Part 1 of the latest version of KCSIE alongside Annex B and Annex A for relevant staff and EYFS guidance on Use of Mobile Phones and Using Photographic Images of Children where relevant
- Anti –Bullying Policy & Relational policy, Child Absent from Education Policy and Attendance Policy
- Policy to Prevent Radicalisation
- Whistleblowing Policy – Speak Up, Speak Out
- Confidentiality Policy
- Policy on taking and storing photographic images and e-communications
- Low Level Concerns Policy
- New staff attend a safeguarding meeting with the DSL or DDSL for teaching staff.
- New staff are made aware that this policy applies to pupils whether under or over 18 years of age including adult pupils aged 19+
- Staff have an information card with key information, points of reference and key staff names and contact details. This is renewed each year

ABUSE OF TRUST

All staff are made aware that inappropriate behaviour with or towards children is unacceptable. In particular, under the Sexual Offences Act 2003 it is an offence for a person over 18 (e.g. teacher, youth worker or older student) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if he/she does not teach the child. Inappropriate behaviour with a current pupil over the age of eighteen constitutes gross misconduct and this includes adult pupils who are aged 19+.

ALLEGATIONS AGAINST A MEMBER OF 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
 - o possibly committed a criminal offence against or related to a child
 - o behaved towards a child or children in a way that indicated they may pose a risk of harm to children.
- Should a pupil disclose abuse by a member of staff, including the Head of Cadogan House or Pre-School, the situation will be reported to the Head immediately. Should the allegation be made against the Head, the situation must be reported to the Chair of Governors immediately who is contactable via the Director of Finance office without informing the Head. We would provide alternative accommodation away from pupils for boarding or resident staff suspended pending an investigation. The Staff Code of Conduct offers clear guidance to protect staff from allegations of abuse
- There are disciplinary procedures in place that adhere to KCSIE (September 2025) and the relevant legislation. Any concerns that do not meet the harm threshold are logged on the Lower Level Concerns document
- The School acts in accordance with locally agreed interagency procedures and KCSIE, for dealing with allegations against staff including always making a referral to the DBS (and to TRA for a teacher) if a person in a regulated activity (paid or volunteer) has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- The School will inform the LADO immediately and work with HSCP and Hertfordshire Police, following their guidelines, in order to deal with any allegations as swiftly as possible and always within 24 hours. In the case of an allegation against the Head, the Chair will contact the LADO. In the case of an allegation against the Chair of Governors, this should be reported to the LADO.

LOW LEVEL CONCERNS

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Any concerns should be reported within 24 hours to the Head or in their absence to the DSL. If a member of staff feels more comfortable in reporting to the DSL they can do so. Please refer to our Lower Level Concerns policy for further details with regards to procedures.

Useful guidance is provided by [the NSPCC](#)

The term ‘low-level’ concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold set out in KCSIE (2025).

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites

- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those, which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings. Further detail can be found in the Low Level Concerns Policy.

WHISTLEBLOWING PROCEDURE – SPEAK UP, SPEAK OUT

- Our policy on whistleblowing (Speak Up, Speak Out) is set out in the Staff handbook and is reviewed annually.
- Any member of staff with a concern about the propriety of a colleague's behaviour should feel free to discuss these concerns with the Head. This will be treated seriously and staff should feel encouraged to take their responsibilities seriously and should not hesitate to express any concerns that they may have. If a concern relates to the Head, the member of staff should contact the Chair of Governors, Simon Staite. There is full immunity for staff expressing a concern about a colleague in good faith.
- The School has a culture of safety and raising concerns, and seeks to value staff and reflective practice. Any member of staff with a concern including about poor or unsafe practices or a possible failure in our safeguarding regime should feel empowered to express their concern to the Head.
- Where a staff member feels unable to raise an issue or that their concern is not being properly addressed, other whistleblowing channels may be open to them such as the NSPCC Whistleblowing Helpline 0800 028 0285 or email help@nspcc.org.uk

THE ROLE OF GOVERNANCE

- The Board of Governors ensures that effective safeguarding policies are in place with a staff code of conduct
- The Governors ensure that all staff are provided with Part 1 and Annex B of KCSIE September 2025 and are aware of specific safeguarding issues
- The Governors ensure that safeguarding induction is in place for all staff
- The Governors annually review the School's safeguarding policies including an update and review of the effectiveness of procedures and their implementation. Safeguarding is on each agenda of the Governors' Pastoral Sub-Committee. DSL meets the Safeguarding Governor termly and works together to produce and evaluate policies and their implementation.
- After any safeguarding-related incident, the DSL, DDSLs and Safeguarding Governors undertake a review of procedures and the efficiency with which the safeguarding duties and safeguarding procedures have been discharged, including Safe Recruitment procedures to:
 - ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay;
 - approve amendments to safeguarding arrangements in the light of changing regulations or recommended best practice.
- The Governors approve the job description of the DSL and DDSLs and ensure they have sufficient time, funding, supervision, regular training and support to perform their duties.

- Governors contribute to inter-agency working which includes providing a co-ordinated offer of early help when additional needs of children are identified
- Governors prioritise the welfare of children and young people and create a culture where staff are confident to challenge senior leaders over safeguarding concerns
- Governors ensure appropriate filters and monitoring systems are in place to safeguard children from potentially harmful online material and the nominated safeguarding governor also serves as the governor with oversight for online safety
- Governors consider how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through Lifeskills and through Relationship and Sex Education (RSE)

THE DUTIES OF THE SCHOOL

- Safeguarding Policies are reviewed annually and are available on the School website. There is Guidance on Child Protection annexed to this policy for Staff, Volunteers and Governors and there is a RMS staff behaviour (Code of Conduct) policy.
- There are disciplinary procedures in place which adhere to KCSIE (September 2025) and legislation referred to therein.
- The DSL and DDSLs are members of the Senior Leadership Team. These officers have undertaken the relevant training and, upon appointment, undertake DSL 'new to role' training. All staff receive refresher safeguarding training every 3 years. DSLs keep up to date with safeguarding issues and update staff at each full staff meeting
- DSL/DDSLs have been fully trained for the demands of this role in safeguarding and inter-agency working. They regularly attend courses with other child support agencies to ensure that they remain conversant with best practice. They undergo refresher training every two years and cover inter-agency working, participation in child protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children.
- The School's paper records on safeguarding are kept locked in a secure cabinet, and are separated from routine pupil records. Access is restricted to the DSL and DDSLs. Electronic records are stored on a secure online site, CPOMS.
- Low level concerns can only be accessed by the Head and DSL.
- All members of staff, volunteers and governors know how to respond to a pupil who discloses abuse. Every member of staff, including temporary, visiting, contract and volunteer staff working in school is required to report instances of actual or suspected child abuse or neglect immediately to the DSL or a DDSL. This includes alleged abuse by one pupil against another in which case both pupils will be considered to be at risk.
- If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately; anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child at some point. This may include contact with the local police force and DfE dedicated helpline for advice to staff.
- All staff are made aware of the early help process and understand their role in identifying emerging problems, sharing information with other professionals and working closely with the DSL to support early identification and assessment of a child's needs to prevent problems escalating.
- Staff and volunteers in school are alert to the potential need for early help for more vulnerable children, eg those with a disability or additional needs; those with SEN; EAL; boarders; young carers; children who engage in anti-social behaviour; children experiencing challenging family circumstances eg substance abuse, mental health issues or domestic violence and children showing early signs of abuse or neglect, including online abuse.
- The School distinguishes between safeguarding children who have suffered or are likely to suffer significant harm and those in need of additional support from one or more

agencies. The former are referred to HCS (or to the relevant local authority should the child not live in Hertfordshire) immediately and the latter receive inter agency assessment via MASH.

- If a pupil is over the age of 18, they may be referred to Adult Services and/or the Adult Mental Health Team
- The School exercises high vigilance in relation to identifying and responding to situations where a child is absent from education, especially on repeat occasions. Any such episode will be reported without delay to the local authority.
- The School recognises its obligation to children who may be privately fostered. If we think a child is privately fostered we will discuss this with the parents or carers and encourage them to notify the local authority. If they consent, the School will contact the local authority on their behalf. If they do not consent we will discuss their concerns with the local authority.
- The lettings policy will seek to ensure the suitability of adults working with children on the site at any time.
- Community users organising activities for children are made aware of the School's safeguarding guidelines and procedures having read and understood the safeguarding policy and whom to contact.
- The Operations Manager who oversees lettings has also undertaken level 3 safeguarding training
- The School promotes a culture of listening to children and taking account of their wishes and feelings.
- The School notifies the HCS Child Welfare Officer if:
 - it should have to exclude a pupil who is on a Child Protection Plan either for a fixed term or permanently.
 - if there is an unexplained absence of a pupil who is on the Child Protection Plan of more than two days duration from school (or one day following a weekend).
- The School works to develop effective links with relevant agencies and co-operates as required with their enquiries regarding safeguarding matters including attendance at initial case conferences, core groups and safeguarding review conferences. Contact will be made with HCS within 24 hours of a disclosure or suspicion of abuse. RMS is quick to take informal advice on borderline cases in order to prevent escalation and to respond to early signs of abuse, sharing information quickly and challenging inaction by contacting MASH or the professionals helpline although recognising parental consent will usually be needed. This includes contact with the local authority Prevent Lead in cases of potential radicalisation.
- The School keeps records of concerns about children noting the date, event and action taken, even where, in discussion with HCS, no formal referral is ultimately made. Such records either are kept locked in the office and are separate from routine pupil records or via CPOMS. A rationale for any decision is noted. Access is restricted to DSL/DDSL.

THE ROLE OF THE DSL

- The DSL is responsible for the following broad areas:
- Briefing school staff (both boarding, non-teaching, teaching staff, governors and volunteers) and, as appropriate, prefects and other senior pupils on the relevant contents of statutory guidance and procedures, including the briefing of new staff as part of their induction after arrival at the School; and
- receiving reports of alleged or suspected child abuse including online within the School, or reported by a pupil relating to incidents at home or outside the School, contacting the HCS and taking other action in response, as set out below. During term time, the DSL and/or DDSL will always be available to discuss any safeguarding concerns. Emergency

contact arrangements for DSL/DDSL are made available for out of term activities and contacts are displayed in the boarding houses for evenings and weekends.

Managing Referrals

- The DSL will refer all cases of suspected abuse to Herts Children's Services (Safeguarding & Specialist Services) or relevant local authority for pupils who reside outside Hertfordshire and
- The Local Authority Designated Officer (LADO) for dealing with all safeguarding concerns that relate to a staff member
- The Disclosure & Barring Service and TRA (cases where a person is dismissed or left due to risk/harm to a child)
- the Police (cases where a crime may have been committed) and where there has been serious harm
- Channel where there is a radicalisation concern
- The DSL/DDSL will refer all allegations against members of staff including volunteers and supply teachers directly to the Head without delay (and keep the supply agency fully informed). In the case of the allegation being against the Head, it must be communicated to the Chair of the Governors without notifying the Head
- The DSL will act as a source of support and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies

Responsibilities:

- Providing guidance to parents, children and staff about obtaining suitable support including online safety
- Developing links with relevant statutory and voluntary agencies
- Monitoring and evaluating the effectiveness of the School's Safeguarding Children Policy and ensuring it is updated annually
- Keeping written records of all concerns, ensuring that such records are stored securely and kept separate from the pupil's general file and/or CPOMS
- 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 within the KCSIE timescale.

Training

- The Designated Safeguarding Lead and the DDSs receive appropriate external Herts training every two years in order to understand the assessment process for providing early help and intervention. In addition, the DSL undertakes Prevent awareness training. The DSL also refreshes knowledge and skills at least annually via online updates and by monitoring safeguarding developments and accessing resources
- has a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensures each member of staff has access to and understands the School's safeguarding policies and procedures, especially new and part time staff and updates staff at each staff meeting on an aspect of safeguarding
- is alert to the specific needs of children in need, those with special educational needs and young carers
- is able to keep detailed, accurate, secure written records of concerns and referrals
- encourages a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
- understands the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment procedures such as early help assessments

- understands and supports the School with regard to the requirements of the Prevent duty and is able to provide advice and support to staff on protecting children from the risk of radicalisation
- keeps staff updated in matters of safeguarding training, including emotional, sexual and physical abuse, neglect, online abuse and peer on peer abuse.

Raising Awareness

- The DSL ensures the School's policies are known and used appropriately
- Ensures the School's safeguarding policies are reviewed annually and the procedures and implementation are updated
- Works with the nominated Safeguarding Governor to review and update policies and keep them apprised of safeguarding procedures and concerns as appropriate
- Ensures the safeguarding policies are published on the school portal and website. Ensures that parents are aware of the fact that referrals about suspected abuse or neglect may be made to outside agencies as appropriate and that the role of the School in handling those referrals is explained to parents
- Liaises with HSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Ensures the safeguarding file on any pupil leaving the School is sent to the new school as soon as possible but transferred separately from the main file
- Obtains proof of receipt by the new school and then destroys any information held on the child in line with data protection guidelines
- Raises awareness of emerging safeguarding issues particularly online concerns

Record-keeping

- The DSL is responsible and fully conversant with the current HSCP procedures in addition the DSL holds and is conversant with the following:
- Hertfordshire Safeguarding Children Partnership: Child Protection Procedures
- Dealing with Allegations of Abuse against Teachers and other Staff – Guidance for Local Authorities, Headteachers, School Staff, Governing Bodies and Proprietors of Independent Schools (October 2012) and updated in KCSIE September 2025 Working Together to Safeguard Children DfE (2018)
- Boarding Schools: National Minimum Standards (2022) (Senior School DSL only)
- Keeping Children Safe in Education (September 2025)
- What to do if you're worried a child is being abused (2015)
- Prevent Strategy (2021) updated 2023.
- Sexual Violence and Sexual Harassment between children in Schools and Colleges September 2021
- Working together to improve attendance 2024
- Working together to safeguard children 2023

Appendix 1

'Safeguarding is everyone's responsibility'

'See, hear, believe, do something'

'It does happen here at RMS'

**'Zero tolerance to sexual violence
and sexual harassment'**

Types of abuse:

Physical, Emotional, Neglect, Sexual

Key documents:

Safeguarding Policy, KCSIE 2025



Who to contact if concerned:

Designated Safeguarding Lead (DSL)

Alison Davies, Deputy Head Pastoral M: 0 XXXXXXXXXXXXX Ext: 5362

Deputy DSLs:

Desmond Cox, Deputy Head (Co-Curricular) Ext: 2042

Clare Freeman, Head of Hind House Ext: 5334

Vicky Grieg, Head of Ruspini House Ext: 2058

Melanie Horn, Head of Cadogan House Ext: 5336

Jo Morris, Head of Inclusion at Cadogan House Ext: 5337

Jennie Simmonite, Deputy Head of Hind House Ext: 5779

Clare Harrison (Safeguarding Governor)

Hertfordshire MASH 0300 123 4043

DfE Advice line 0370 000 2288

Appendix 2

The Dos: Listen/Reassure/Record/Refer

- **Do Listen:** The most important thing when someone is hearing a disclosure is that they listen closely to what the child says. They need to hear exactly what is being said. They must listen in a way that encourages the child to speak for as long as they want to and to say as much as they need to.
- **Do Reassure:** The child needs to be reassured that they are doing the right thing by speaking out and that the member of staff is ready to listen and support the child. The child also needs to be reassured that they are not going to lose control of things by speaking out.
- **Do Record:** Once the child has finished speaking, the member of staff must expedite the production of a contemporaneous note of what the child has said. The note needs to be as accurate as possible and to capture any unusual words or phrases used by the child.
- **Do Refer:** Once the note is made, signed and dated, it must be marked “Private and Confidential” and be given to the DSL; this must happen on the day of the disclosure and if the DSL is not in school, the note should be given instead to the Deputy DSL.

The Don'ts: Contribute/Confidentiality/Careless/Forget or C3F

- **Don't Contribute:** When listening to a distressed child, it is tempting to help the story along, either by asking leading questions when the child isn't wholly clear, or nodding and completing the sentences when the child is too upset to speak smoothly. Mindful that a note of the disclosure will be needed, it is also tempting for the employee to check their understanding of what the child has said by summarising what they have heard. None of these things is allowed. The employee's role is solely to listen and (s)he must not add to the narrative in any way at all. If the child is so distressed that the disclosure is incoherent, the employee might ask the child to repeat something or put it another way, but that is all: everything in the narrative must come from the child.
- **Don't offer secrecy or confidentiality:** It is more than likely that a child approaching a member of staff in order to make a disclosure will ask if that member of staff can keep a secret. No such promise of confidentiality can be given. However, it is not helpful to put this negatively; it is far better for the employee to put a positive spin on things: “I'm sorry, I can't promise to keep a secret but I can promise you this—we will talk about what happens next. I may need to pass on what you have to tell me, but I promise I will tell you what I am going to do and why.”
- **Don't be Careless:** Children making a disclosure will have invested a good deal of emotional capital in the member of staff they approach and there is always a chance they will end up feeling let down by them. With this in mind, the member of staff does need to think carefully about the setting in which a disclosure conversation takes place. There obviously needs to be a degree of privacy, but the setting should be one where the employee and child can be casually overlooked by people passing. Sitting in a room with the door shut, but still in view of people able to see in through a window in the door, would provide reasonable privacy without the risks that come with exclusivity.
- **Don't Forget:** Mindful again that a note of the disclosure will be required, if the child's tale is long or complex, it may be worth making some notes as she speaks. When the listener makes notes it can, however, inhibit the child; it is important to balance the need for the child to feel able to speak freely and the need to be able to report later on what was freely said. If no notes are taken, then the record of the disclosure will have to be written very quickly after the child has finished speaking

Appendix 3

Misunderstanding of Sexual Consent

The rules on sexual relations and school pupils are not complex but misunderstandings have arisen for a range of reasons and the consequences have been grave. To ensure there are no damaging misconceptions, schools do need to make some basic facts crystal clear to all pupils, staff and volunteers. First, anyone under eighteen years old is a **child** so any attempt to force or entice an individual under eighteen to take part in sexual activities, even ones not involving actual sexual contact, constitutes the sexual abuse of a child (Para 47). Second, anyone over eighteen who is an employee or volunteer at a school is in a “position of trust” (Sexual Offences Act 2003) and it is illegal for such a person even to arrange to meet (let alone actually meet) anyone who is a pupil at the school, with the purpose of engaging in **any** sort of sexual activity (including ones not involving actual sexual contact): this is the case even if the pupil is consenting and eighteen years old, or over. Third, a child over sixteen can consent to sexual relations with another person (with the definite exception of anyone who is an employee or volunteer at the child’s school) but that consent has to be **freely** given and can never be something into which the child is enticed, persuaded or pressurised. If there is any suspicion that a child has been pressed or cajoled into a sexual act activity (including activity not involving actual sexual contact) then there is a suspicion that sexual **abuse** has taken place; such suspicions always have to be reported expeditiously to the DSL. Fourth, whilst some children under sixteen may be deemed “Gillick Competent”, that is, judged sufficiently mature to be able to give informed consent to medical treatment – including the use of contraception – assessment of whether a child **is** Gillick competent in matters of sexual activity is not an issue for teachers and those involved in the pastoral care of children, but the preserve of medical professionals (ISSRs B27). As far as any employee outside a school’s medical centre is concerned, the presumption has to be that someone under sixteen cannot freely consent to sexual activity and when such activity is known, or suspected, it has in **every** case to be reported to the DSL.

Because these rules are at odds with so much that is apparently commonplace in society and reported as normative in the media, schools need constantly to reinforce the legal position to all members of the community and to make it plain, too, to parents and guardians. Additionally, since the age of consent varies significantly across jurisdictions (varying between 14 and 18 within EU countries) boarding schools that educate pupils from overseas have to be very clear with non-UK students and must emphasise that the only law relevant to a school’s Safeguarding duty is the law of England and Wales (or Scotland/Northern Ireland if that is where the school is located).

KCSIE makes it clear that children with special learning difficulties have particular issues when it comes to Safeguarding. It is important that schools are mindful that “consent” requires understanding and that levels of understanding usual for a child of sixteen or seventeen cannot automatically be attributed to a child of this age with a learning difficulty. Although KCSIE stresses “forcing or enticing” a child into sexual activity as the hallmarks of sexual abuse, it is evident that any exploitation of limited understanding on the child’s part would mean that their participation could not be truly consensual, so the sexual activity would be abusive. Thus if there is any suspicion that a child’s naivety, emotional immaturity or intellectual limitations have been exploited as a means of engaging the child in sexual act activity (including activity not involving actual sexual contact) then there is a suspicion that sexual **abuse** has taken place; such suspicions always have to be reported expeditiously to the DSL.

Issues like forced marriage (KCSIE, Annex B) serve as a reminder that cultural differences within the UK are relevant to the Safeguarding duty. It is important to note that a child with a distinct cultural identity may have retained an innocence that is at odds with what might

usually be expected of a British teenager. Schools have to be clear in their Safeguarding training that this is pertinent to the point that sexual activity in the absence of consent is in all circumstances abusive, for a child cannot consent unless they are fully **informed** about what is at stake – a cultural background that inhibits the development of full understanding should cause questions to be asked about the degree to which a child's sexual activity is consensual. Where there is any suspicion that a child's cultural background has compromised the capacity for informed consent to sex (including sexual activities not involving actual sexual contact) there is a suspicion that sexual abuse has taken place; such suspicions always have to be reported expeditiously to the DSL.

Appendix 4

The Royal Masonic School for Girls - Logging Concern Form

Your Name (PRINT):	Name of Child/ren:
Time, Day and Date of incident (if applicable):	Tutor Group
Which type of abuse: (Please ring)	Physical, Emotional, Neglect, Sexual
<p>Describe the incident as factually as possible. Include who was involved, where it happened, exactly what happened etc. Use the child's words. Remember to describe clearly any behaviour or physical signs you have observed.</p>	
<p>What actions did you take?</p>	
<p>What has happened to child now: Back to class/Health centre</p> <p>What is mood of the child?</p> <p>What did you tell the child would happen?</p> <p style="text-align: right;">Your Signature:</p>	
Time and Date of when the form was written:	

This form should be handwritten. Do not create a digital record. Check your report before personally **handing** it over to the Designated Senior Lead in your section of the school. Make sure this form is legible and uses plain English. Please remember this form might be read by someone not working at RMS.

This form is confidential and only relevant staff will be consulted.

Received By

Date and Time:

Proposed Action By the designated safeguarding lead:
What is the decision on risk? Why

Referral/Early help route

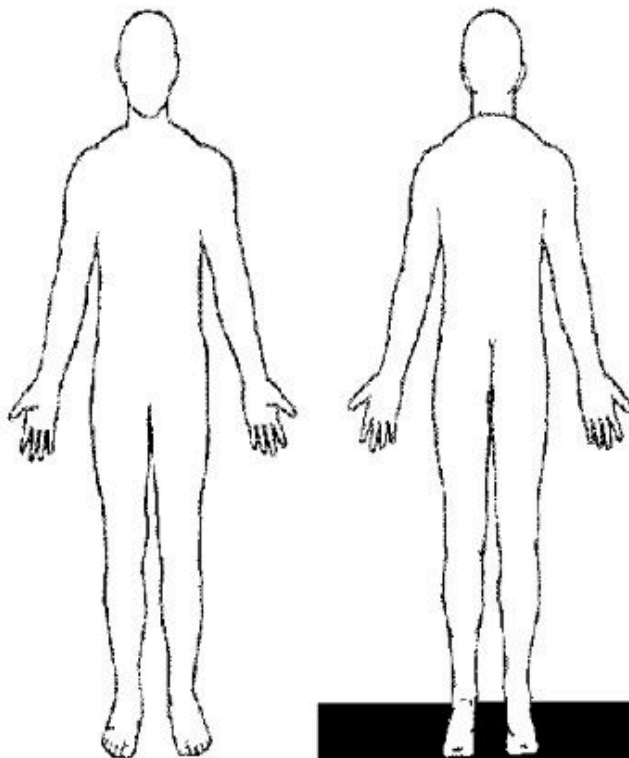
Who has been informed/ why

Feedback to Referrer

The diagrams below only needs to be filled in if applicable to the concern/s expressed overleaf.
The purpose of this page is to accurately locate physical contact or a mark/bruise/wound on the body.

First Name:

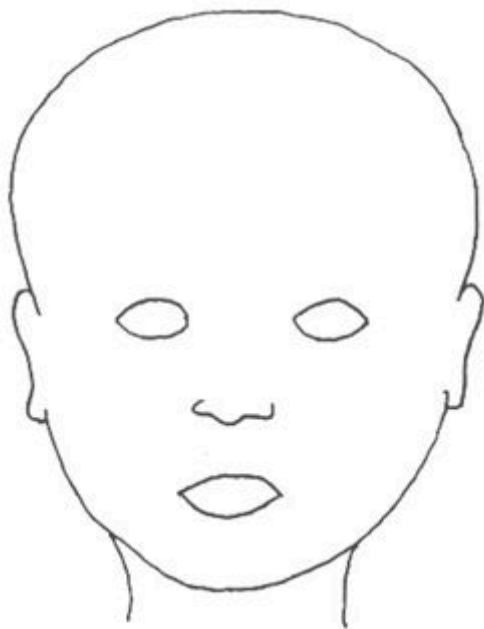
Last Name:



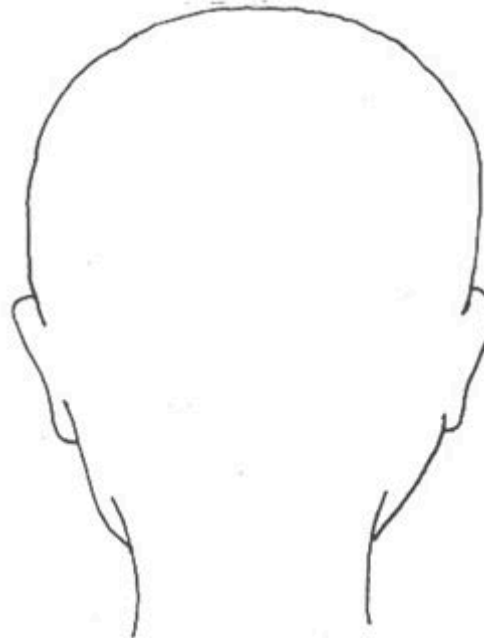
Front

Back

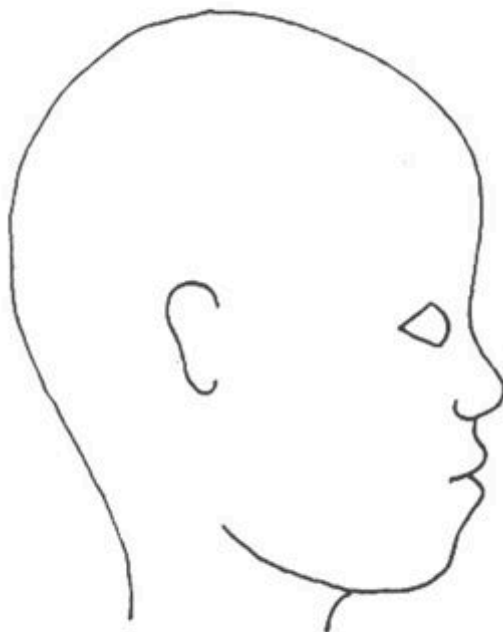
First Name:	Last Name:
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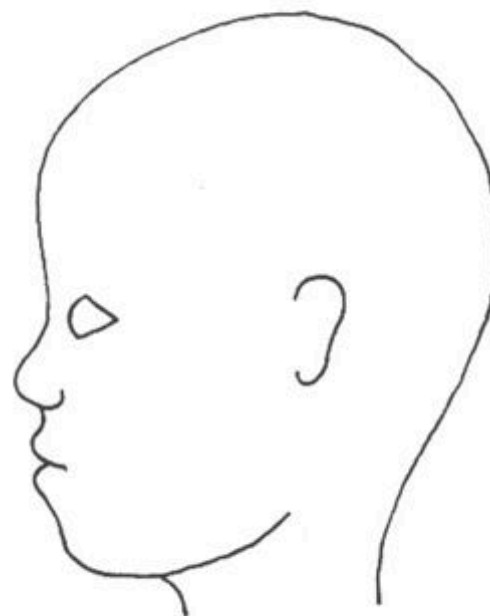
FRONT



BACK

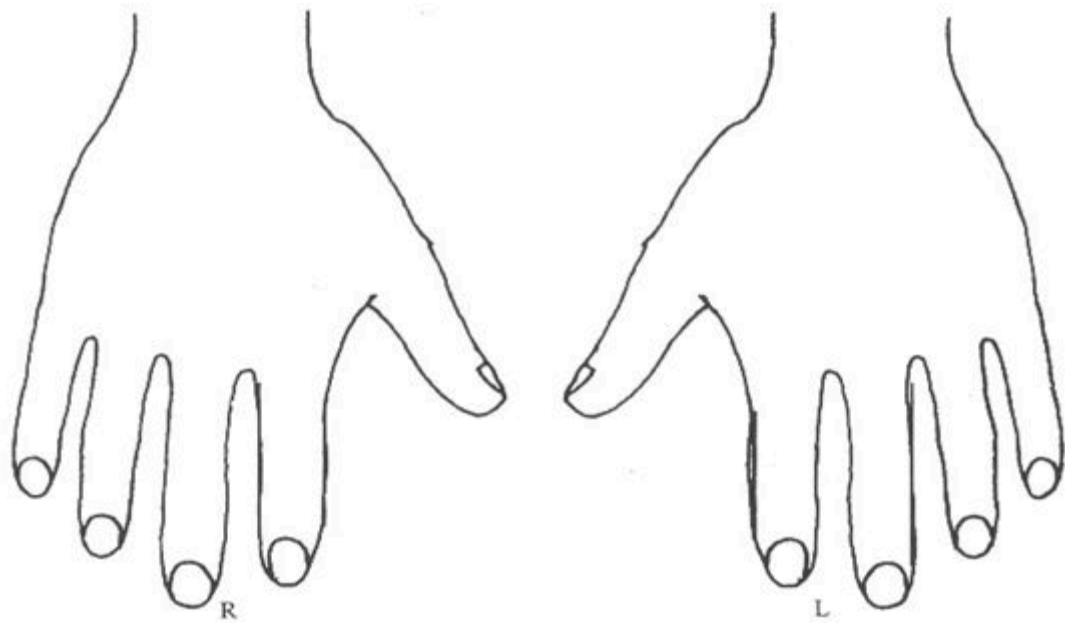


RIGHT

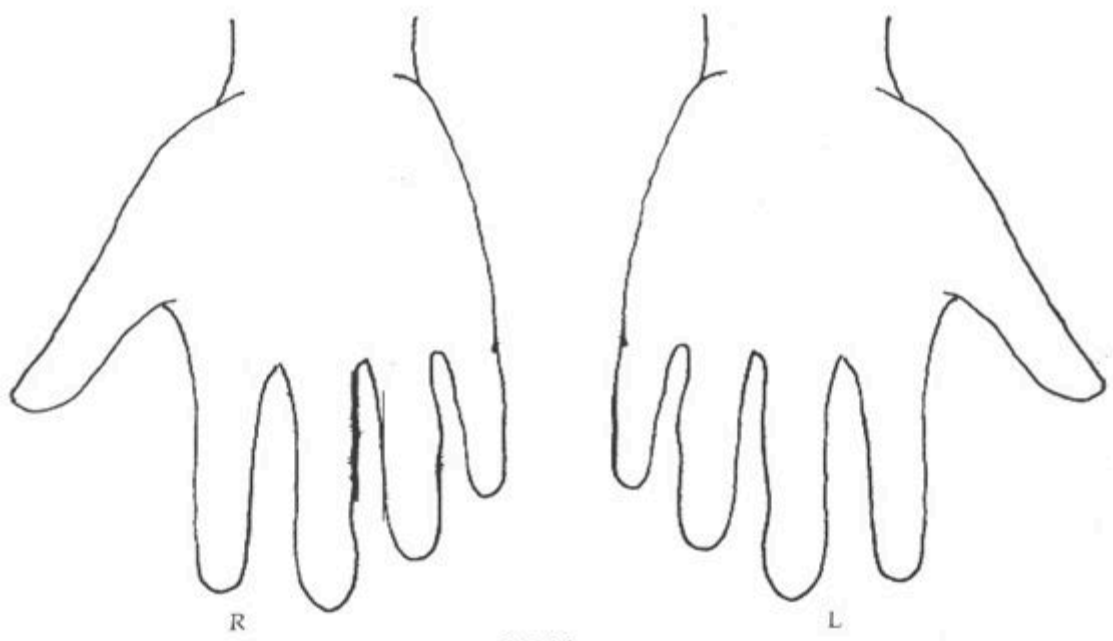


LEFT

First Name:	Last Name:
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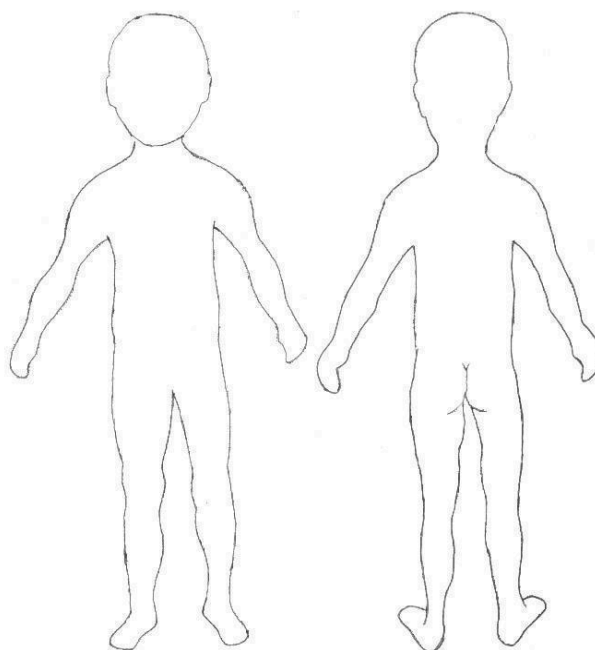


BACK



PALM

First Name:	Last Name:
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Checklist for DSP (to be printed on back of record of concern form)

- ✓ Child clearly identified?
- ✓ Name, designation and signature of the person completing the record populated?
- ✓ Date and time of any incidents or when a concern was observed?
- ✓ Date and time of written record?
- ✓ Distinguish between fact, opinion and hearsay
- ✓ Concern described in sufficient detail, i.e. no further clarification necessary?
- ✓ Child's own words used? (Swear words, insults, or intimate vocabulary should be written down verbatim.)
- ✓ Record free of jargon?
- ✓ Written in a professional manner without stereotyping or discrimination?
- ✓ The record includes an attached completed body map (if relevant) to show any visible injuries (body map available at www.thegrid.org.uk/info/welfare/child_protection/proformas/index.shtml)

Audit date:		Audited completed by:	
Overall RAG rating (see key below)			
Action needed	Timescale	Name and position of person responsible	Date action completed

RED	Indicates that information from the checklist is lacking and deficiencies need to be addressed as a matter of urgency
AMBER	Indicates that key information is included but recording could be further improved
GREEN	Indicates that the recording meets the above required standards

If you intend to give a copy of the above action plan to the member of staff, please ensure they are not given page 1, i.e. the actual record of concern form which contains confidential details.

Appendix 5

Sharing of nudes and semi-nudes: How to respond to an incident

What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges (UKCIS, 2020 and updated March 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.

Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.

If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

Do not delete the imagery or ask the young person to delete it.

Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame any young people involved.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).