

Applies from 1 September 2024

# Safeguarding (Child Protection) Policy

Date of next Trustee Review: May 2025

UPPINGHAM

# UPPINGHAM

## Contents

|  |           |
|--|-----------|
| <b>Contact Details for Reporting Safeguarding Concerns</b> .....   | <b>4</b>  |
| <b>Abbreviations Used in This Document</b> .....   | <b>8</b>  |
| <b>1. Policy Statement</b> .....   | <b>9</b>  |
| 1.1 Who does this policy apply to? .....   | 9         |
| 1.2 What is Child Protection and Safeguarding? .....   | 9         |
| 1.3 Core Principles.....   | 9         |
| 1.4 Creating a Safe Culture .....  | 10        |
| 1.5 Related Documentation .....  | 10        |
| <b>2. Roles and Responsibilities</b> .....   | <b>11</b> |
| 2.1 The Designated Safeguarding Lead (DSL) and Deputy DSL .....  | 11        |
| 2.2 The Headmaster .....   | 11        |
| 2.3 Employees and Volunteers .....   | 11        |
| 2.4 Trustees .....   | 12        |
| 2.5 The Designated Safeguarding Trustee.....   | 12        |
| 2.6 The Independent Pupil Advocate (Independent Listener) .....  | 12        |
| <b>3. Reporting Concerns about Children</b> .....  | <b>13</b> |
| 3.1 Reporting Concerns .....   | 13        |
| 3.2 What to do if a Child Makes a Safeguarding Disclosure.....   | 13        |
| 3.3 Responding to Incidents of YPSI ('Sexting') .....  | 14        |
| 3.4 Responding To Concerns about Radicalisation or Extremism .....   | 14        |
| 3.5 Responding to Concerns about Female Genital Mutilation .....   | 15        |
| 3.6 Action by The DSL Following a Safeguarding Disclosure .....  | 15        |
| 3.7 Support for Pupils Involved In A Child Protection Issue .....  | 16        |
| 3.8 Notifying and Gaining Consent from Parents .....   | 16        |
| 3.10 Pupils in contact with the police.....  | 17        |
| <b>4. Reporting Concerns about Staff (Including Agency, Supply Staff, Trustees and Other Volunteers)</b> ..... | <b>17</b> |
| 4.1 Duty to report safeguarding concerns.....  | 17        |
| 4.2 Procedure for reporting safeguarding concerns .....  | 18        |
| 4.3 Actions where an allegation is substantiated .....   | 18        |
| 4.4 Confidentiality following an Allegation.....   | 19        |
| 4.5 'Low-level' concerns.....  | 19        |
| <b>5. Complaints and Whistleblowing</b> .....  | <b>19</b> |
| <b>6. Reports to Regulatory / Advisory Bodies</b> .....  | <b>19</b> |
| <b>7. Records, Monitoring and Transfer</b> .....   | <b>20</b> |
| 7.1 Maintaining Records .....  | 20        |
| 7.2 Confidentiality of Records .....   | 20        |
| 7.3 Data Protection and Right of Access to Records.....  | 20        |
| 7.4 Transfer of Records .....  | 21        |
| <b>8. Safer Recruitment</b> .....  | <b>21</b> |
| <b>9. Training and Induction</b> .....   | <b>22</b> |
| 9.1 All Staff.....   | 22        |
| 9.2 Designated Safeguarding Lead and Deputies .....  | 22        |
| 9.3 Trustees .....   | 22        |
| 9.4 Pupils .....   | 22        |
| <b>10. Staff Conduct</b> .....   | <b>22</b> |
| 10.1 Physical Contact with Pupils .....  | 23        |
| 10.2 Physical Restraint of a Pupil .....   | 23        |
| <b>11. Uppingham School Enterprises Ltd</b> .....  | <b>23</b> |
| <b>12. External Organisations Using School Facilities</b> .....  | <b>24</b> |
| <b>13. Visitors to the School Site</b> .....   | <b>24</b> |
| <b>14. Early Help</b> .....  | <b>24</b> |
| <b>15. Children Who May Be Particularly Vulnerable</b> .....   | <b>24</b> |

# UPPINGHAM

|   |           |
|---|-----------|
| 15.1 Children Needing Special Consideration .....                   | 25        |
| 15.2 Children with Special Education Needs and Disabilities .....   | 25        |
| 15.3 Children with Mental Health Needs.....                         | 26        |
| 15.4 Trauma-Informed Practice .....                                 | 26        |
| <b>16. Children Missing or Absent from Education .....</b>          | <b>26</b> |
| <b>17. Private Fostering Arrangements.....</b>                      | <b>27</b> |
| <b>18.1 Child on Child Abuse.....</b>                               | <b>27</b> |
| <b>18.2 Bullying .....</b>  | <b>28</b> |
| <b>18.3 Child on Child Sexual Violence and Harassment .....</b>     | <b>28</b> |
| 18.3.1 Recognising .....  | 28        |
| 18.3.2 Responding.....  | 29        |
| 18.3.3 Reporting .....  | 29        |
| 18.3.5 Risk assessment.....   | 29        |
| <b>19. Safeguarding within the Curriculum.....</b>                  | <b>30</b> |
| <b>20. Online Safety.....</b>                                       | <b>30</b> |
| <b>21. Photography and Images.....</b>                              | <b>31</b> |
| <b>22. Policy Review Process.....</b>                               | <b>31</b> |
| <b>APPENDIX 1: How to Report Concerns .....</b>                     | <b>32</b> |
| <b>APPENDIX 2. Understanding Abuse and Neglect .....</b>            | <b>33</b> |
| <b>APPENDIX 3. Further Information on Safeguarding Issues .....</b> | <b>35</b> |
| <b>APPENDIX 4. Staff Code of Conduct .....</b>                      | <b>36</b> |
| <b>APPENDIX 5. Low Level Concerns Policy.....</b>                   | <b>39</b> |
| 1. Purpose of this Guidance .....                                   | 39        |
| 2. What Is a ‘Low Level Concern’? .....                             | 39        |
| 3. Reporting Low Level Concerns .....                               | 39        |
| 4. Self-Reporting.....  | 40        |
| 5. Anonymous Reports .....  | 40        |
| 6. Confidentiality .....  | 40        |
| 7. Response to Reported Low-Level Concerns.....                     | 40        |
| 8. Response where a concern is not substantiated.....               | 41        |
| 9. Whistleblowing.....  | 41        |
| 10. Record-Keeping.....   | 41        |
| 11. Referring to Low-Level Concerns in References.....              | 41        |
| <b>APPENDIX 6. Role and Responsibilities of the DSL .....</b>       | <b>42</b> |
| <b>Availability .....</b>   | <b>42</b> |
| <b>APPENDIX 7. Related Documentation .....</b>                      | <b>45</b> |
| <b>APPENDIX 8: Summary of Revisions to this Policy.....</b>         | <b>47</b> |

# UPPINGHAM

## Contact Details for Reporting Safeguarding Concerns

Contact details can sometimes change between revisions of this policy. For continuously updated information, please see the [Contact Details page](#) on the UPPNet Safeguarding Hub.

**IF YOU THINK A CHILD IS IN IMMEDIATE DANGER, CALL THE POLICE ON 999**

**FOR URGENT 'OUT OF HOURS' ENQUIRIES, CONTACT  
THE ELT DUTY PHONE ON 07706 295641**

|  |  |  |
|--|--|--|
| <b>Designated Safeguarding Lead (DSL)</b>    | Rebecca Kay<br><a href="mailto:rhk@uppingham.co.uk">rhk@uppingham.co.uk</a><br>01572 822216 (office), 07816 091444 (mobile)  |  |
| <b>DSL / Deputy DSL shared email</b>         | <a href="mailto:safeguarding@uppingham.co.uk">safeguarding@uppingham.co.uk</a>   |  |
| <b>Deputy DSLs</b>                           | Karl Wilding<br><a href="mailto:kmw@uppingham.co.uk">kmw@uppingham.co.uk</a><br>01572 820605<br><br>Richard Hannigan<br><a href="mailto:rkgh@uppingham.co.uk">rkgh@uppingham.co.uk</a><br><br>Clair Munton<br><a href="mailto:clm@uppingham.co.uk">clm@uppingham.co.uk</a><br>01572 820829 | To report concerns about pupils or to ask advice                   |
| <b>Deputy DSL for Uppingham Enterprises</b>  | Richard Poole<br><a href="mailto:rp3@uppingham.co.uk">rp3@uppingham.co.uk</a><br>01572 820802  | To report concerns relating to events run by Uppingham Enterprises |
| <b>Headmaster</b>                            | Richard Maloney<br><a href="mailto:headmaster@uppingham.co.uk">headmaster@uppingham.co.uk</a><br>01572 820601  | To report concerns about a member of staff                         |
| <b>Chair of Trustees</b>                     | Barbara Matthews<br><a href="mailto:ChairofTrustees@uppingham.co.uk">ChairofTrustees@uppingham.co.uk</a><br><br><i>Use this address to request the Chair to make contact with you. Please do not share details of your concern in the email.</i>   | To report concerns about the Headmaster.                           |
| <b>Designated Safeguarding Trustee</b>       | Jon Scott<br><a href="mailto:jonscott010@gmail.com">jonscott010@gmail.com</a>  | To report concerns about the School's safeguarding practices       |
| <b>Music Department Safeguarding Advisor</b> | Simon Smith<br>01572 820704<br><a href="mailto:sas@uppingham.co.uk">sas@uppingham.co.uk</a>  | Provides advice for the specific context of the Music Department.  |

# UPPINGHAM

|  |   |  |
|--|---|--|
| <b>Independent Pupil Advocate</b>                        | Nat Stiles<br>07740 486982<br><a href="mailto:nataliestiles110@btinternet.com">nataliestiles110@btinternet.com</a>  | A person independent of the school staff, with whom pupils or staff may raise concerns they do not feel confident to raise directly with the school. |
| <b>Rutland Social Care RAIS Team</b>                     | 01572 758407<br><a href="mailto:childrensreferrals@rutland.gov.uk">childrensreferrals@rutland.gov.uk</a><br><a href="https://www.rutland.gov.uk/my-services/health-and-family/childrens-social-care/report-a-concern-children-and-young-people/">https://www.rutland.gov.uk/my-services/health-and-family/childrens-social-care/report-a-concern-children-and-young-people/</a> | For all referrals to Social Care.<br>Mon – Thu, 8.30 – 5.00<br>Fri 8.30 – 4.30   |
| <b>Social Care Out of Hours Service</b>                  | 0116 305 0005   | Emergency referrals requiring same-day response  |
| <b>Rutland Local Authority Designated Officer (LADO)</b> | Donna Cole & Chris Edwards<br>01572 758454<br><a href="mailto:LADO@rutland.gov.uk">LADO@rutland.gov.uk</a>  | To make a referral relating to concerns about a member of staff  |
| <b>Rutland Children Missing from Education</b>           | Helga Spry-Shute<br>01572 758335<br><a href="mailto:hspryshute@rutland.gov.uk">hspryshute@rutland.gov.uk</a>  | To discuss children resident in Rutland who may be missing from education.   |

|   |  |   |
|---|--|---|
| <b>NSPCC Whistleblowing Advice Line</b> | <a href="https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/">https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/</a><br>0800 028 0285<br><a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> | To report any safeguarding concern that you do not feel confident reporting within the School |
| <b>Government Forced Marriage Unit</b>  | 020 7008 0151<br><a href="mailto:fm@fcdo.gov.uk">fm@fcdo.gov.uk</a>  | To report concerns that a child is at risk of forced marriage                                 |

|  |   |  |
|--|---|--|
| <b>Leicestershire Prevent Programme</b>                    | 101 and ask for Prevent Team<br>0116 248 6726<br>Online referral form:<br><a href="https://www.leics.police.uk/advice/advice-and-information/t/prevent/prevent/beta/prevent-team-referral/">https://www.leics.police.uk/advice/advice-and-information/t/prevent/prevent/beta/prevent-team-referral/</a> | To make a direct referral to the Prevent programme   |
| <b>Department for Education Counter-Extremism Division</b> | <a href="https://report-extremism.education.gov.uk/">https://report-extremism.education.gov.uk/</a>   | To report concerns about extremism within an education setting, including allegations against institutions and staff         |
| <b>Operation Encompass Helpline</b>                        | Professionals National Advice & Guidance Line<br>Monday to Friday, 8am-1pm<br>0204 513 9990   | To access advice from an Educational Psychologist in support of a child who has experienced domestic violence in their home. |

# UPPINGHAM

|   |  |  |
|---|--|--|
| <b>FREEVA Professionals Advice</b>              | 0808 802 0028<br><a href="https://www.freeva.org.uk/portfolio/information-for-professionals/">https://www.freeva.org.uk/portfolio/information-for-professionals/</a> | For advice and support for victims of domestic abuse or sexual violence  |
| <b>NSPCC FGM helpline</b>                       | 0800 028 3550<br><a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>  | For advice on suspected cases of FGM.                                    |
| <b>CAMHS Advisory Service for Professionals</b> | 0116 295 5048<br>(8.30am–3.00pm)   | For advice on mental health issues from CAMHS professionals              |
| <b>NSPCC Abused in Education Helpline</b>       | 0800 136 663<br><a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>   | Advice and support for young people who have experienced abuse at school |

# UPPINGHAM

## Key Principles of Safeguarding at Uppingham

Uppingham School is committed to safeguarding and promoting the welfare of children and young people regardless of age, ability, race, culture, religion, sexuality or class. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children, their families and carers, has a role to play in safeguarding children. Uppingham therefore expects all staff, trustees, volunteers and parents to share this commitment.

OUR FIVE GUIDING PRINCIPLES ARE:

- 1. Nothing is more important than keeping children safe.**  
Safeguarding comes before anything else.
- 2. Everyone has a part to play.**  
It is the job of every adult to play their part in making Uppingham a community where young people are safe.
- 3. Everyone must be vigilant.**  
Much though we want to believe that other people are well-intentioned, we cannot be complacent. We know 'it could happen here.'
- 4. Everyone has an absolute duty to report concerns and ensure they are acted upon.**  
This is a moral, professional and legal duty.
- 5. Concerns must be reported immediately.**  
If we notice something that worries us, we must not delay in reporting it.

# UPPINGHAM

## Abbreviations Used in This Document

|                     |   |
|---------------------|---|
| <b>ACE</b>          | Adverse Childhood Experience<br><i>Highly stressful, and potentially traumatic, event or situation during childhood that can have a significant impact on later life.</i> |
| <b>BSA</b>          | Boarding Schools Association  |
| <b>CCE</b>          | Child Criminal Exploitation<br><i>Grooming and using young people for criminal (often drugs-related) activity.</i>  |
| <b>CPD</b>          | Continuing Professional Development   |
| <b>CSE</b>          | Child Sexual Exploitation   |
| <b>DBS</b>          | Disclosure and Barring Service<br><i>The government agency which checks applications to work with children, to ensure applicants are fit to safe with young people.</i>   |
| <b>DfE</b>          | Department for Education  |
| <b>DSL</b>          | Designated Safeguarding Lead<br><i>The person with ultimate responsibility for safeguarding in the school.</i>  |
| <b>FGM</b>          | Female Genital Mutilation   |
| <b>GDPR</b>         | General Data Protection Regulation (2018)   |
| <b>HBV</b>          | Honour-Based Violence   |
| <b>HR</b>           | Human Resources Department  |
| <b>KCSIE</b>        | Keeping Children Safe in Education<br><i>The government document which outlines schools' safeguarding responsibilities.</i>   |
| <b>LAC</b>          | Looked After Child<br><i>Child who is under the care of the Local Authority.</i>  |
| <b>LADO</b>         | Local Authority Designated Officer<br><i>A safeguarding officer at the Local Authority who provides guidance to schools managing concerns about members of staff.</i>     |
| <b>MyConcern</b>    | <i>Software used at Uppingham to report and manage safeguarding concerns.</i>   |
| <b>NSPCC</b>        | National Society for the Prevention of Cruelty to Children  |
| <b>Prevent Duty</b> | A duty under the Counter-Terrorism and Security Act (2015) to take measures to prevent people from being drawn into terrorism.  |
| <b>RAIS</b>         | Referral, Assessment and Intervention Service<br><i>The 'front door' of Social Services: the team which receives and assesses all new referrals.</i>                      |
| <b>SEND</b>         | Special Educational Needs and Disabilities  |
| <b>UPPNet</b>       | <i>The Uppingham School intranet</i>  |
| <b>USSC</b>         | Uppingham School Sports Centre  |
| <b>YPSI</b>         | Youth Produced Sexual Imagery   |



# UPPINGHAM

## 1. Policy Statement

### 1.1 Who does this policy apply to?

When official guidance talks about a 'child', it generally means anyone who has not yet reached their 18<sup>th</sup> birthday. However, this policy covers every pupil, whatever their age. If they are one of our pupils, we have a duty to ensure they are safe.

Safeguarding is the individual responsibility of everyone, and everyone has a part to play. Duties outlined in this policy apply to every adult employed by the school, and to anyone living or working on school premises. This includes trustees, visitors, agency or supply staff, and unpaid volunteers. The policy also applies to activities operated by Uppingham School Sports Centre and Uppingham School Enterprises Ltd.

The policy will be available on the School website for anyone who wishes to view it.

### 1.2 What is Child Protection and Safeguarding?

When we talk about **safeguarding**, we mean things which reduce the risk of children suffering significant harm and promote their welfare. [Working Together to Safeguard Children](#) tells us that safeguarding means

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

**Child Protection** is a part of safeguarding. It means actions which protect children who could suffer significant harm.

### 1.3 Core Principles

While we would like to think that all young people are loved, cared for and supported by the people around them, we know this is not always the case. In working with children, we will always be mindful of the possibility that *'it could happen here'*.

Our commitment to children who are at risk of harm is to:

- Recognise** signs that a child is at risk.
- Respond** to the child's needs in a timely and appropriate way.
- Report** our concerns to the Safeguarding Team.
- Refer** to internal and external agencies that can protect and support the child.

There are four key elements to this policy:

- **Prevention.** We will provide an environment where all children feel secure, are encouraged to talk, and are listened to. We will raise awareness of safeguarding issues and equip children with skills they need to keep them safe. When appointing staff and volunteers, we will practise safer recruitment procedures.
- **Protection.** We will ensure all staff and volunteers are safely recruited, know their safeguarding responsibilities, and are supported to respond appropriately to safeguarding concerns. We will operate a safe and secure school site and ensure that contractors and other visitors are appropriately checked and supervised at all times.
- **Support.** We will provide support for children who are at risk of harm or have suffered abuse, in accordance with their agreed safeguarding plan.

# UPPINGHAM

- **Working with others.** The School is committed to strong partnership as outlined in [Working Together to Safeguard Children](#) (2023). We will ensure every effort is made to establish effective working relationships with parents, guardians, colleagues from the three safeguarding partners (local authorities, integrated care boards, clinical commissioning groups and the police) and other agencies. In our efforts to safeguard and promote the welfare of children, the school takes account of the most recent legislation and guidance and operates within [locally-agreed inter-agency procedures](#).

We endeavour to apply the insights of a contextual safeguarding to our practice. Contextual safeguarding is a model which recognises that children's lives are shaped by multiple contexts. Children may be at risk of abuse or exploitation in situations outside the school or their families. Extra-familial harms may take a variety of different forms: for example, sexual abuse (including harassment and exploitation), domestic abuse within intimate relationships, criminal exploitation, youth violence, county lines, and radicalisation. In responding to a child's needs, we must therefore understand not only their experience at school, but also the family, friendship, neighbourhood, and online 'worlds' they inhabit.

## 1.4 Creating a Safe Culture

While policies, systems and processes are all necessary, the highest priority is to create a school culture which has safeguarding at its heart. This begins with ensuring respect for pupils' rights under the Human Rights Act 1998 and Equality Act 2010, but goes much further. It means putting the welfare of young people above everything else; building an open, tolerant and inclusive ethos; working to involve staff, pupils and parents in the safeguarding 'team'; challenging barriers of hierarchy or trust which make people reluctant to report concerns; and being willing to learn lessons when things go wrong.

The School strives to build a strong culture in which members of the community behave caringly and respectfully towards each other. The School's pastoral systems ensure pupils receive regular guidance on how to keep themselves safe and manage risk.

We recognise that the boarding environment has inherent risks for which we must compensate. These include pupils who have more limited contact with parents than non-boarders; an intense, and potentially 'closed' community where unhealthy 'traditional' hierarchies and attitudes could exist; pupils sharing overnight accommodation; and pupils living in close proximity to staff which can, unless well-managed, permit poorly-defined physical and emotional boundaries to exist. We are explicit about all of these issues in staff training and offer regular advice to mitigate potential problems.

The School implements clear anti-bullying policies and encourages pupils to speak to a member of staff of their choosing about any worries they may have. [UPPNet](#), House noticeboards and regular briefings make pupils aware of where they can find help and advice, both within the School and outside.

To support the creation of a safe culture, the School implements robust policies for issues such as bullying, drugs and alcohol, and online safety. These may be found in the [UPPNet Policies Library](#).

## 1.5 Related Documentation

This policy is only part of the School's efforts to keep children safe. It should be read alongside relevant legislation, statutory guidance, best-practice advice and the School's internal policies. The most important of these documents are listed in Appendix 7.

# UPPINGHAM

## 2. Roles and Responsibilities

### 2.1 The Designated Safeguarding Lead (DSL) and Deputy DSL

The person with primary responsibility for Child Protection and Safeguarding matters at Uppingham is the Designated Safeguarding Lead (DSL) **Rebecca Kay**. She is assisted by a team of Deputy DSLs: **Karl Wilding**, **Richard Hannigan**, and **Clair Munton**, to whom particular tasks (but not ultimate lead responsibility) may be delegated. **Richard Poole** acts as Deputy DSL for activities run by Uppingham School Enterprises.

The Deputy DSLs are trained to the same level as the DSL. The DSL or Deputy DSL is the first point of contact for all matters of child protection. All concerns and queries must be reported to them.

The role of the DSL is described in Annex C of [KCSIE](#) and a detailed description of the DSL's role is given in Appendix 5 of this policy.

### 2.2 The Headmaster

The Headmaster, either in person or by delegation, will:

- Ensure this policy is implemented by all staff.
- Ensure this policy is easily available to all parents, guardians and other interested parties.
- Allocate sufficient time, training and resources to enable the DSL to carry out his role effectively.
- Foster a culture where all staff feel able to raise concerns about poor practice; and ensure that any concerns are handled sensitively and in accordance with whistleblowing procedures.
- Ensure pupils have regular opportunities to learn about safeguarding, including keeping themselves safe online.
- Ensure a child's wishes are taken into account when determining action to be taken.
- Liaise with the LADO where an allegation is made against a member of staff.
- Ensure that anyone who has harmed, or poses a risk to, a child is referred promptly to the DBS, where they were, or could have been, dismissed due to safeguarding concerns. Also, that prompt referral is made to the Teaching Regulation Agency and other regulatory / advisory bodies, if appropriate.

To enable him to fulfil these responsibilities, the Headmaster has completed DSL training.

### 2.3 Employees and Volunteers

Everyone who works at Uppingham has a role to play in keeping children safe. It is the responsibility of every employee and volunteer to identify concerns early; provide help for children; promote their welfare; prevent concerns from escalating; and provide a safe environment in which children can learn. This means that every member of staff must

- Act at all times in the best interests of the child.
- So far as possible, protect children from abuse and neglect.
- Provide a safe environment for children to live and learn.
- Be vigilant in protecting the welfare of children, and constantly aware 'it could happen here'.
- Complete induction in child protection at the start of their Uppingham career.
- Undertake child protection 'refresher' training at three-yearly intervals.
- Read the School's Safeguarding (Child Protection) policy annually, and confirm that they have done so.
- Staff who work directly with children must read at least Part One and Annex B of [KCSIE](#). Staff who do not work directly with children may read only Annex A instead.
- Receive safeguarding and child protection updates as required, but at least annually.
- Be aware of the signs of abuse and neglect so they can identify children at risk of harm.
- Be aware of the School's child protection procedures, and follow them.
- Be aware of the School's [Behaviour & Discipline Policy](#).
- Know how to implement child protection procedures independently, if necessary.
- Be aware of the Early Help process.

# UPPINGHAM

- Keep an adequate record of any significant complaint, conversation or event.
- Promptly report any matter of concern (including concerns about the conduct of another member of staff), following procedures outlined in this policy.
- Make a direct referral to Social Services and / or the police themselves immediately if they fear there is a risk of imminent serious harm.

## 2.4 Trustees

The School's Trustees have a strategic leadership responsibility for its safeguarding arrangements. As a body, their duty is to facilitate a whole-school approach to safeguarding, ensuring safeguarding and child protection underpin all relevant aspects of process and policy development so that all systems, processes and policies operate with the best interests of the child at their heart. They should test, challenge and assure themselves that safeguarding in the school is effective.

A full description of the Trustees' duties is found in Part 2 of [KCSIE](#).

## 2.5 The Designated Safeguarding Trustee

While retaining corporate responsibility, the trustee body designates an individual as Safeguarding Trustee. This is currently **Professor Jon Scott**. The Designated Safeguarding Trustee's responsibilities include:

- Liaison with the DSL.
- Undertaking training for Nominated Safeguarding Governors, and being familiar with current safeguarding regulations.
- Undertaking an annual review of safeguarding and child protection to assure trustees that pupils are safe, regulatory requirements met, and any necessary improvements implemented.
- Producing an annual report for trustees which outlines the adequacy of policies and their implementation, and recommends improvements. The report will cover, *inter alia*:
  - The effectiveness of relevant procedures and their implementation.
  - Adequacy of staff training and training records, including those for the DSL.
  - The handling of safeguarding issues dealt with during the year.
  - The adequacy of training and resources for the DSL.
  - Referral information in requests for help and support for individual children.
  - The School's contribution to inter-agency working.
  - Any challenges the School has faced, and any areas for improvement in its safeguarding practice.
- Liaison (under delegation from the Chairman) with the LADO and partner agencies, in the event of allegations made against the Headmaster or a trustee.

The Trustees will receive and discuss the Safeguarding Trustee's annual report, and ensure that adequate minutes of the Trustees' review are recorded.

## 2.6 The Independent Pupil Advocate (Independent Listener)

The Independent Pupil Advocate (previously known as the Independent Listener) is a person independent of the school who can be contacted by any pupil wishing to raise a matter of concern they do not feel confident to share directly. Contact details are widely advertised on UPPNet and pupil noticeboards. The Independent Pupil Advocate is currently **Mrs Natalie Stiles**.

The Independent Pupil Advocate will report any concerns raised promptly to the most appropriate person or agency. Depending on the nature of the concern raised, this may include the School DSL or external agencies. The Independent Pupil Advocate will preserve the confidentiality of the person raising the concern, so far as possible, but cannot promise absolute secrecy for any safeguarding concern.

# UPPINGHAM

## 3. Reporting Concerns about Children

### 3.1 Reporting Concerns

A member of the Safeguarding Team is available at all times during School term, including overnight, and whenever a School trip takes place during School holidays.

All members of staff have a duty to report safeguarding concerns without delay. If a child is thought to be at immediate risk, the DSL / Deputy DSL should be contacted by phone or in person. Otherwise, the easiest way for most staff to report concerns is MyConcern. Email, telephone or in-person report to the DSL / Deputy DSL is also possible.

The [UPPNet Safeguarding Hub](#) and posters on staff noticeboards give full guidance on how concerns can be reported, including all necessary contact details (also available on pp. 4 - 6 of this policy). A simple summary of how to report concerns can be found at Appendix 1.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to Children's Social Care (and if appropriate the police) is made immediately. Referrals should follow the referral process of the relevant local authority. Anybody can make a referral, and staff must do so themselves if the DSL is not quickly available. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible.

Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, or may not recognise their experiences as harmful. Embarrassment, fear or vulnerability may all be barriers. This should not prevent staff from having a professional curiosity and speaking to the Safeguarding Team if they have concerns about a child. There will be occasions when staff suspect that a child may be at risk, but have no definite evidence to support this suspicion. In these circumstances, staff are encouraged to give the child opportunity to talk, and ask them if they need any help. Staff should record these early concerns and report them immediately.

### 3.2 What to do if a Child Makes a Safeguarding Disclosure

If a child discloses that they are being harmed, or are at risk of significant harm you should:

- Listen carefully to the child and keep an open mind. Staff should not make a decision about whether or not they think the abuse has taken place.
- Allow the child to speak freely and not ask leading questions (that is, a question which suggests a 'correct' answer).
- Remain calm and not overreact. The child may stop talking if they feel they are upsetting you.
- Reassure the child but do not give a guarantee of absolute confidentiality. Where possible, seek the child's consent about which individuals or agencies will be informed. The member of staff should explain that they need to pass the information to the DSL, who will ensure that the correct action is taken.
- Keep a sufficient written record of the conversation and preserve any evidence (for example, scribbled notes, screenshots, etc.). Best practice suggests you should not write notes while the pupil is speaking, but immediately after the meeting. If an aide-memoire is required, only very brief phrases or notes should be jotted down – the priority is to listen and writing notes may lead a pupil to clam up. The record should include the date, time and place of the conversation and the 'who, what, when and where' of the allegation. The record should be signed by the person making it and use names, not initials. The record must be kept securely and handed to the DSL at the first opportunity.
- Report details of the conversation to the DSL.
- Seek support if you feel distressed.
- Never start your own investigation.
- Share information on a need-to-know basis only. Do not discuss with colleagues, friends or family.

All staff have a 'duty to persist' in ensuring a safeguarding matter is dealt with appropriately. The member of staff making the initial referral should expect to be informed that action has been taken by the DSL. If no communication is received from the DSL within 24 hours, the member of staff should make further contact. If the member of staff still feels that the DSL has not responded to the concern appropriately, they must go directly to Children's Services.

# UPPINGHAM

## 3.3 Responding to Incidents of YPSI ('Sexting')

In responding to incidents of sexting, the school will act in accordance with guidance published by HM Government as [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (UKCIS, 2024). [A summary of this advice](#) is published on the UPPNet Safeguarding Hub and easily accessible for any member of staff dealing with an incident.

Key points to note are:

- All incidents of youth produced sexual imagery (sometimes referred to as "YPSI") will be dealt with as safeguarding concerns and must be reported to the safeguarding team without delay, even if the imagery seems to have been produced consensually. This includes images that appear to have been generated by AI and other 'pseudo-images'.
- If staff become concerned about YPSI on a device in the possession of a student (e.g. mobile phone or laptop), the member of staff should confiscate the device and pass it immediately to the DSL. Staff must not ask to view, look at, print or forward any images.

After receiving a report of an incident, the DSL will consider next steps. Before making a decision to view imagery, the DSL must be satisfied that this:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved);
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report;
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

In such cases, the DSL will gain authority from the Headmaster and Children's Social Services and will ensure viewing takes place with another senior member of staff present in the room (who does not need to view the images). Wherever possible, images will be viewed by a staff member of the same sex as the young person in the imagery. Viewing will be recorded in the pupil's safeguarding file, including details of who was present, why the image was viewed and any subsequent actions.

Young people who share sexual imagery of themselves or their peers are breaking the law. However, it is important to avoid criminalising young people unnecessarily. The school will therefore work in partnership with external agencies and respond proportionately to the circumstances of any incident. The DSL will discuss the concerns with appropriate staff and speak to young people involved. Parents/ guardians will be informed at an early stage and involved in the process, unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made to Social Services and / or the police. The Police will always be informed if there is reason to believe that

- the images involve sexual acts and a child in the images is under 13 years of age;
- there is adult involvement;
- there is criminal / abusive behaviour such as sexual abuse, extortion, threats, or sending / showing of images without the informed consent of a young person who is pictured.

If the School has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

Various organisations will assist young people in removing images that have been shared online. Details of these are [publicised on UPPNet](#) and posters in boarding houses.

## 3.4 Responding to Concerns about Radicalisation or Extremism

The [Prevent duty guidance for England and Wales](#) (2015, revised 2023) places all staff under an obligation to be aware of the ways in which extremist groups attempt to influence and radicalise young people and report any concerns to the Safeguarding Team. This is often known as the 'Prevent Duty'. To ensure they



# UPPINGHAM

are able to do this effectively, staff receive training as part of their regular triennial safeguarding update and are asked to complete further online training at appropriate intervals. Guidance on risk indicators and risk-assessments can be found in the DfE's publication [Managing risk of radicalisation in your education setting](#) (October 2022).

Any concern that a pupil could be exposed to an extremist ideology must be treated as a safeguarding concern. The DSL (**Rebecca Kay**) acts as Uppingham's Prevent Single Point of Contact (SPOC) and is responsible for leading Uppingham's safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

While there is no single way of identifying individuals who might be susceptible to extremist views, staff should be aware that factors in a child's background (e.g. social isolation or emotional problems) may contribute to heightened vulnerability, as may the influence of family or friends. 'Grooming' by extremists through social media has become an important method of radicalising young people and there have also been incidents of 'self-radicalisation' through individuals viewing online materials. The risk of radicalisation may also vary according to wider social and political factors.

## 3.5 Responding to Concerns about Female Genital Mutilation

FGM involves cutting or injuring the female genital organs for non-medical reasons. It is a practice that is not condoned by any religion and can leave physical and mental scars on the girl involved. It is illegal in the UK but young girls are sent abroad to have the procedure carried out.

Where any member of staff suspects a girl has been subjected to FGM or is at risk of being so, they should discuss their concerns with the Safeguarding Team. School staff must never undertake physical examinations of pupils.

Where FGM in a girl aged under 18 is confirmed (either through direct disclosure by the victim or observation of physical signs which appear to show that an act of FGM has been carried out), teachers are under a *personal* mandatory duty to report this to the police, by calling 101 or (if there is a risk of immediate harm to the child) 999. This should be done as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day. The Safeguarding Team must also be informed. Further information on reporting procedures is [available from the Department for Education and Home Office](#).

## 3.6 Action by The DSL Following a Safeguarding Disclosure

DSL action will be taken as soon as possible and take into account:

- [Procedures of the Leicester, Leicestershire and Rutland Safeguarding Children Partnerships](#) or other relevant local multi-agency arrangements, depending upon the pupil's home address.
- The nature and seriousness of the concern. A concern involving a potential criminal offence will always be referred to Children's Services and the police, without investigation within the School.
- The wishes of the pupil, provided they are of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions need to be taken that override a pupil's wishes.
- The wishes of the parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk, she will take further advice from relevant professionals before making a decision to disclose.
- Duties of confidentiality, so far as applicable.
- The lawful rights and interests of the School community as a whole, including its employees and its insurers, while recognising that the interests of the child are, in all circumstances, the primary consideration.

Where appropriate, the DSL will ensure that the child is kept informed of what is being done. The DSL will also inform the member of staff making the initial referral that action has been taken.

# UPPINGHAM

If there is room for doubt as to whether a referral should be made, the DSL may consult with Children's Social Care, the LADO or other appropriate professionals on a 'no-names' basis, without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours. If no response or acknowledgment is received within one working day, the DSL will contact Social Care again.

## 3.7 Support for Pupils Involved In A Child Protection Issue

Abuse is devastating for a child and can result in significant distress and anxiety. Uppingham will support pupils by:

- Taking all concerns, suspicions and disclosures seriously.
- Carefully following the School's own policies and procedures.
- Ensuring regular communication between School and home to keep all parties informed.
- Offering details of helplines, counselling or other avenues of support.
- Responding sympathetically to any request for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis, only with relevant individuals / agencies.
- Storing records securely.
- Cooperating fully with statutory agencies.
- Ensuring that any approach to safeguarding and promoting the welfare of children is child-centred and in the best interests of the child.

## 3.8 Notifying and Gaining Consent from Parents

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will normally make contact with the parent in the event of a suspicion, concern or disclosure. Parents or carers should also normally be kept informed about the progress of a case and told the outcome where there is not a criminal prosecution.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Children's Services. Where a strategy discussion is required, or police / Children's Services need to be involved, those agencies should be consulted before information is disclosed to parents. If the allegation involves a member of staff, parents should only be informed with the LADO's consent.

While the school will normally make every effort to involve parents in matters relating to their child, parental consent is not required for referral to statutory agencies. Members of staff must act at all times in the best interests of the child.

It is permissible to share information without consent where there is good reason to do so and this will promote the safeguarding of a child. It would be legitimate to share information without consent where it is not possible to gain consent; it cannot be reasonably expected that consent will be given; and if gaining consent would place a child at risk.

## 3.9 Confidentiality following an Allegation

Staff can never give absolute guarantees of confidentiality to pupils or adults. However, they should only share information with the minimum number of people necessary to ensure that proper action is taken. Staff must never tell anyone who does not have a clear 'need to know' and should take whatever steps they can to protect the informing pupil / adult from any retaliation or unnecessary stress that could result from the disclosure of alleged abuse.



# UPPINGHAM

## 3.10 Pupils in contact with the police

Children are required to have an appropriate adult with them when in contact with police officers who suspect them of an offence.

The [Police & Criminal Evidence Act 2019 \(PACE\)](#) states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child. PACE further states that if an officer has reason to suspect that a person of any age may be vulnerable, then that person is also entitled to be accompanied by an appropriate adult.

The DSL will communicate any known vulnerabilities to a police officer who wishes to speak to a pupil about an offence. This communication will be recorded on MyConcern. If the DSL does not feel that an officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned before being questioned; before being asked further questions (should their initial answers provide the grounds for suspicion); and if it seems that their answers or silence may potentially be given in evidence to a court in a prosecution. A police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

An appropriate adult' generally means, in the case of a child either the parent, guardian or a social worker. Failing these, some other responsible adult aged 18 or over who is not a police officer or in any way connected with a police force.

## 4. Reporting Concerns about Staff (Including Agency, Supply Staff, Trustees and Other Volunteers)

### 4.1 Duty to report safeguarding concerns

Raising any worries about the conduct of a colleague is part of our duty of care to children. If any member of staff has reasonable suspicion that a child is suffering harm, and fails to act in accordance with this policy, it will be viewed as misconduct.

Staff have a professional duty to report any concern that a colleague (including visitor or volunteer) may have

- behaved in a way that has, or may have, harmed a child;
- committed a criminal offence against or related to a child;
- behaved towards a child in a way that indicates they may pose a risk of harm to children;
- behaved in a way that indicates they may not be suitable to work with children. (This may include an incident outside of school which did not involve children but could have an impact on the staff member's suitability to work with them – so-called "transferrable risk").

Staff should feel confident that any concerns they express about a colleague's conduct will be taken seriously and acted upon.

In a culture of continuous improvement, staff should feel able to use the Whistleblowing Procedure (see below, section 4.3) to raise concerns about poor practices or potential failures in the School's safeguarding regime. Such concerns will be taken seriously by the Leadership Team.

Staff against whom an allegation is made will be encouraged to seek personal support. The HR Department can assist in making arrangements for this.

# UPPINGHAM

## 4.2 Procedure for reporting safeguarding concerns

The procedure for reporting concerns about a member of staff (including volunteer or visitor) are summarised in Appendix 1.

- Such concerns should be reported immediately to the **Headmaster**. The Headmaster will inform the LADO and take appropriate advice on further action.
- If the allegation is against the Headmaster or a Trustee, it should be reported to the **Chair of Trustees**, who will inform and take advice from the LADO.
- If the allegation is against the Chair of Trustees, it should be reported directly to the **LADO**.

The School will not undertake its own investigation of an allegation against a member of staff without prior consultation with the LADO.

In the event that a concern relates to a member of supply staff provided by an agency, the agency should be fully involved in subsequent reporting, investigation and management of the allegation.

A member of staff receiving an allegation of abuse against a colleague must keep a sufficient written record of the conversation and preserve any evidence (for example, scribbled notes, messages, etc.). The record should include the date, time and place of the conversation and the 'who, what, when and where' of the allegation.

Where an allegation of abuse is made against a member of staff, the School has a robust procedure for dealing with it. This is sent out annually to employees under separate cover. It follows statutory guidance and is reviewed annually (or as updates occur) by the HR Director.

In cases where a member of staff living in one of the boarding houses is suspended from work following a child protection allegation, the School will make alternative arrangements for accommodation away from pupils. Under the Boarding Schools Association's '[Commitment to Care' Charter](#), BSA will be notified of any allegation against a member of staff, whether recent or non-recent, which the school has referred to the LADO, to the police or to Children's Services. The report will be made as soon as it is permissible to do so and will include an outline of the allegation and external agencies that have been involved. It will not include any information that might identify individuals involved.

## 4.3 Actions where an allegation is substantiated

If an allegation against a member of staff is substantiated, consideration will be given to whether the member of staff concerned should be referred to the Teaching Regulation Agency. If so, the referral will be made as soon as possible.

A detailed report will be made to the Disclosure and Barring Service (DBS) at the earliest opportunity (and in any event, within one month) if any person (whether employed, contracted, a volunteer or student) is believed to have

- harmed, or posed a risk of harm, to a child;
- received a caution or conviction for a relevant offence
- committed a relevant offence;
- been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left the school's employment.

The School will ensure that a person who is no longer in the employment of the School does not remain in the School or School-owned accommodation. In the event that an occupant of such accommodation is dismissed for gross misconduct (whether summarily or with pay in lieu of notice) they must vacate the property within 48 hours of notice of their dismissal.

# UPPINGHAM

## 4.4 Confidentiality following an Allegation

Staff must not speculate publicly about any allegation against an employee and must not respond to any request from the media, pupils, parents or the public for statements, either written or verbal. Any such requests should be directed to the Headmaster's Office.

## 4.5 'Low-level' concerns

Uppingham aims to promote an open and transparent culture in which all concerns about adults working on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This includes instances when adults may have acted in a way that is inconsistent with the Staff Code of Conduct (inside or outside work) even where this does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO – so-called 'low-level' concerns.

A growing body of research shows children are more likely to experience abuse in institutions where 'low-level' poor practice and boundary violations are tolerated. Reviews of institutions in which serious abuse has been discovered have further observed that indicators of what was happening were noticed by staff, but their significance was not realised, and they were not acted upon. Therefore, it is important that staff report *all* concerns that the Staff Code of Conduct has been breached, even where this may appear to be a relatively minor matter.

Staff should be reassured that their reports will be treated confidentially and sensitively. In the great majority of cases, breaches of the Code of Conduct will be a matter of misjudgement rather than malign intent and words of advice or support from a senior manager, accompanied by a letter of concern, explanation, or clarification will be the most appropriate response.

Information on how to report low level concerns and how they will subsequently be handled can be found in the School's Low Level Concerns Policy (see Appendix 5 of the document).

## 5. Complaints and Whistleblowing

If a member of staff is dissatisfied with the way a safeguarding matter has been handled, they should raise this with the Headmaster.

If reporting to the Headmaster would be inappropriate (e.g. a case in which the Headmaster had already been personally involved), or if still not satisfied with the outcome, then the member of staff should escalate their concern to the Chair of Trustees.

If still unhappy with the response (or if, at any stage, they are not confident to report concerns internally), they should refer their concern to the Designated Officer for Rutland or the [NSPCC's Whistleblowing Advice Line](#). Contact details for both can also be found at the front of this policy. The School has a published Whistleblowing Policy which demonstrates how staff can escalate concerns without fear of reprisal.

## 6. Reports to Regulatory / Advisory Bodies

In the event of a serious safeguarding incident, the School may have a duty to make a report to various regulatory bodies, including the Independent Schools Inspectorate, Charity Commission, Teaching Regulation Agency or Boarding Schools Association. This is in addition to the police, Social Care, and other external agencies.

Each of these bodies has its specific areas of interest (which may overlap) and their own reporting thresholds. However, the School is likely to need to report incidents such as

- Serious harm to a pupil in the School's care;
- Significant failures in safeguarding systems and processes, even if no actual harm resulted;

# UPPINGHAM

- Abuse or mistreatment of a pupil by someone connected with the School, or allegations / suspicion that this has occurred.

These are broad categories, and it is important that the Headmaster and DSL consider all cases individually and ensure that a report is made to all appropriate bodies at the earliest opportunity.

## 7. Records, Monitoring and Transfer

### 7.1 Maintaining Records

Well-kept records are essential to good child protection practice. All safeguarding concerns and discussions, along with decisions and the reasons for them, must be recorded in writing. This should include instances where a decision was made not to refer to another agency. All staff must be clear about the need to record and report concerns about a child. If in doubt, staff should discuss with the DSL.

Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints / concerns about any individual, and ensuring these are acted upon.

Records are retained by the school in line with guidelines issued under local multi-agency arrangements.

### 7.2 Confidentiality of Records

The School keeps any paper records in a secure location and digital records under conditions of equivalent security. Safeguarding files are stored separately from other pupil or staff records. Access is restricted to specific staff with a need to see them, such as the DSL, Deputy DSLs and Headmaster, counselling and medical staff. Boarding staff who are *in loco parentis* or directly responsible for supervision of the pupil may be given access to individual files of pupils for whom they are caring, if this is judged necessary to ensure the safety and welfare of the pupil.

### 7.3 Data Protection and Right of Access to Records

Information sharing is vital in identifying and tackling abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have powers to hold, process and share information for these purposes. Proactively sharing information as early as possible helps identify, assess, and respond to risks to a child's safety and welfare. Data protection legislation is not a barrier to sharing information, and concerns for confidentiality should not be allowed to stand in the way of the need to promote the welfare of children.

The General Data Protection Regulation (GDPR) and Data Protection Act (2018) applies to safeguarding records as much as any other personal data that the school holds. It places duties on the School and the individuals it employs to process personal information in a fair, lawful and transparent manner. Safeguarding information should only be collected where there is a legitimate reason to do so (in this case, the protection of pupils from harm) and used only for that purpose. Records should be kept as accurate and up-to-date as possible, and retained only for as long as there is a justifiable reason to do so.

In general, data should only be processed with the consent of the individual it concerns. However, it may be lawful to do so without consent where this is necessary to protect the physical, mental or emotional well-being of an individual. Safeguarding records can, therefore, be maintained even without an individual's consent being obtained.

The School works on the general principle that individuals have a right to see records relating to them. If pupils request access to their own safeguarding file, correction or deletion of any information which they contain, the DSL will take this general right of access into account when deciding whether to release the file. However, this general right of access may be restricted if, in the judgement of the DSL, release of the file may put the pupil or any other individual at risk of harm. In some cases, it may be appropriate to release the file in an edited or

# UPPINGHAM

redacted format. Where parents request access to their children's safeguarding records, the DSL will further take into account the age of the pupil concerned and the fact that the data strictly belongs to the child and not the parent.

The School may share information with external professional agencies (e.g. police, medical or social workers) when it is in the best interests of the child to do so.

Further guidance may be found in Part 2 of [Keeping Children Safe in Education \(2023\)](#), and [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government, July 2018).

## 7.4 Transfer of Records

When a pupil transfers to another school within the UK, their Child Protection Record is forwarded to the new school without delay. If the pupil is the subject of a Child Protection Plan, the child's social worker is informed.

Where the child continues their education outside the UK, the school will consider whether transfer of records is in the child's best interests and may prevent harm. Satisfactory assurances about the confidential storage of records will be sought before any transfer takes place.

Safeguarding records will be transferred separately from other records, using a secure method. Wherever possible, records will be transferred directly to the named individual responsible for safeguarding at the receiving school and a signed, dated record of the transfer obtained. A copy will be kept at Uppingham until safe receipt is confirmed. Files requested by other agencies (e.g. police) will also be copied.

## 8. Safer Recruitment

The School is committed to safer recruitment, ultimate responsibility for which lies with the Trustees. Safer recruitment measures include checking the suitability of staff and volunteers (including staff employed by another organisation) to work with young people, in accordance with the latest regulations and guidance.

The Headmaster and HR department are responsible for implementing these procedures in practice. The School's Safer Recruitment policy, Safeguarding Handbook and Safer Recruitment Manual give further details.

All necessary checks will be carried out on the suitability of people who serve on the School's governing body of Trustees, in accordance with regulations and guidance given in [KCSIE](#).

# UPPINGHAM

## 9. Training and Induction

### 9.1 All Staff

It is important that all staff have training to help them recognise possible signs of abuse, neglect or exploitation and know what to do if they have a concern. The school aims to provide staff with comprehensive training on safeguarding matters, including online safety and the Prevent duty.

The DSL, working together with the HR Director, Director of Safeguarding and Assistant Head (Teacher Development) ensures all staff receive appropriate safeguarding training (including details of the School's [Behaviour & Discipline policy](#)) as part of their induction programme.

Thereafter, all staff are required to undergo refresher training every three years. On top of this, all staff receive safeguarding updates as part of their CPD (at least annually and through regular, informal updates as required). A comprehensive guide to safeguarding policy and practice is available to staff on the [UPPNet Safeguarding Hub](#).

### 9.2 Designated Safeguarding Lead and Deputies

The DSL and Deputy DSLs attend initial Child Protection Training and a one-day refresher every two years, in order to remain fully up-to-date. They also ensure that they receive regular updates throughout the year and keep themselves abreast of changes and developments.

### 9.3 Trustees

Every trustee must receive sufficient training that equips them to provide strategic challenge, test and assure themselves that safeguarding policies and procedures are effective, and support the delivery of a robust whole-school approach to safeguarding.

All School trustees therefore complete the NSPCC 'Child protection for school governors' online training package on induction and have a one-to-one meeting with the DSL. This training is repeated every three years. They also receive regular updates and reports from the school, including a triennial refresher for the whole board focused on issues most relevant to the School's local context.

### 9.4 Pupils

All pupils receive safeguarding briefings at an age-appropriate level, at least annually.

The School briefs senior pupils given positions of responsibility over other pupils on appropriate action to take if they receive allegations of abuse. This takes place during the Praeposters' induction programme.

## 10. Staff Conduct

The school has a duty to ensure that relationships between staff and children are conducted in a professional manner at all times, and that staff are clear what constitutes appropriate behaviour and boundaries. As well as keeping children safe, this also ensures that actions by members of staff are not misinterpreted. Useful advice can be found in the Uppingham School Staff Code of Conduct (see Appendix 4), and [Guidance for safer working practice for those working with children and young people in education settings](#) (2022).

# UPPINGHAM

Among other issues, all staff should be aware of the dangers inherent in:

- Working alone with a child.
- Physical interventions.
- Cultural and gender stereotyping.
- Dealing with sensitive information.
- Giving to, and receiving gifts from, children and parents.
- Contacting children through personal telephones (including texting), email, social networking or messaging applications.
- Disclosing personal details inappropriately.
- Favouritism
- Meeting pupils outside school hours or school duties.
- Making inappropriate sexual comments.
- Excessive one-to-one attention, beyond the normal requirements of the role.
- Inappropriate sharing of images.

## 10.1 Physical Contact with Pupils

Physical contact between staff and pupils is discouraged because it can lead to misunderstandings. A member of staff cannot know how even 'innocent' contact will be received and interpreted by a child. In most cases, therefore, staff should avoid physical contact with pupils.

There are, however, occasions when physical contact may be appropriate within the role the member of staff is performing: for example, to carry out first aid; to provide comfort at a moment of emotional distress; to restrain a pupil in order to prevent injury; to attract their attention in a noisy environment; or to demonstrate a particular technique as part of a lesson. In such instances, staff should:

- Consider whether it is possible to achieve the desired outcome without making physical contact;
- Take into account the pupil's age, stage of development, gender, cultural and personal background;
- Seek the pupil's consent for physical contact on each occasion when it is required, unless a need for immediate action makes this impossible;
- Restrict contact to less sensitive parts of the body (e.g. arms, shoulders, legs below the knee), unless absolutely necessary;
- Limit physical contact to the minimum needed to achieve the desired outcome.

## 10.2 Physical Restraint of a Pupil

Use of physical control / intervention is very rare at Uppingham. If required (for example to avoid a pupil harming themselves or others), it should be applied in accordance with the School's [Use of Reasonable Force Policy](#).

## 11. Uppingham School Enterprises Ltd

Uppingham School Enterprises Ltd is the wholly-owned trading subsidiary of Uppingham School, responsible for the School's commercial activities, external lettings, and Uppingham School Sports Centre (USSC).

All activities operated by Uppingham School Enterprises are covered by this policy, and all staff involved in running them will be given appropriate safeguarding training and made aware of the requirements of this policy.

The Deputy DSL for Uppingham School Enterprises is there to deal with any safeguarding concerns that may arise in the course of its activities, and to ensure effective liaison with the wider School safeguarding team.



# UPPINGHAM

## 12. External Organisations Using School Facilities

External organisations using School facilities for activities that include children (whether for hire or on a *pro bono* basis) are required by Uppingham School Enterprises to confirm that they have their own Child Protection policy in place as part of their conditions of hire and that they abide by the guidance given in [After-school clubs, community activities and tuition: safeguarding guidance for providers](#) (DfE, 2023).

If the School receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children it will follow its own safeguarding policies and procedures, including informing the LADO.

## 13. Visitors to the School Site

It is important that all visitors to the School site are appropriately checked and supervised. The procedures for this are set out in the School's Visitor (Adult) Policy, which can be found in the [UPPNet Policies Library](#). Staff should be aware of the need for any visitors they are hosting to be properly checked and signed in and seek advice from the HR Department if in any doubt about requirements.

On the School's site, it is important that staff are vigilant and challenge any unbadged, unaccompanied visitors, even if they appear to be there on legitimate business. Assistance should be sought from the School's security team if this causes any concern.

Where visitors to the School will be addressing or meeting pupils, the visit organiser is responsible for checking their suitability and ensuring they are supervised throughout their visit. Details are set out in the School's [Visiting Speaker Policy](#).

## 14. Early Help

Early help means providing support as soon as a problem emerges in a child's life. Providing early help can be more effective in promoting the welfare of children than reacting later.

Some children may be particularly vulnerable, and it is important that staff are particularly alert to their needs. Please see section 15 below for more details.

Effective early help relies upon local agencies working together to identify need and provide targeted support that will improve outcomes for the child. All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals, and, in some cases, acting as the lead professional in undertaking an early help assessment.

Where a child would benefit from co-ordinated early help, an inter-agency assessment should be arranged. Chapter three of [Working Together To Safeguard Children](#) (2023) provides detailed guidance on the early help process.

## 15. Children Who May Be Particularly Vulnerable

Some children may be at increased risk of neglect, abuse or exploitation. Many factors can contribute to an increase in risk, including prejudice and discrimination; social isolation or exclusion; communication issues; and the fact that some adults are reluctant to accept abuse happens or have a high level of tolerance of neglect.

In identifying those who may be vulnerable, the School will be mindful their protected characteristics under the Equality Act (2010), including sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation.



# UPPINGHAM

The fact that a young person is lesbian, gay, bisexual, or gender questioning does not, by itself, put them at increased risk of harm. However, children who are (or are perceived to be) in one of these groups may be targeted by peers. Risks can be compounded if there is a lack of trusted adults with whom they can be open. All staff should therefore endeavour to promote inclusion, reduce the additional barriers faced by pupils who are lesbian, gay, bisexual, or gender questioning, and provide a safe space for them to speak out or share concerns.

Where a child is identified as needing special consideration and attention, this will be provided through the School's pastoral systems:

- House staff, along with Woodfield Health Centre medical, nursing and counselling staff will be made aware of the child's potential vulnerability.
- The Pastoral Support Committee (which includes the Assistant Head Safeguarding, Senior Deputy Head, Assistant Head Pastoral, Lead Nurse and Lead Counsellor) will ensure there is effective co-ordination between the School's medical and pastoral teams.
- Other resources, including Learning Support, clinical and educational psychologists linked to the School and the support of external agencies may be involved in providing support.

## 15.1 Children Needing Special Consideration

To ensure all children receive equal protection, we will give special consideration and attention to any child who

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is living permanently away from home;
- Is frequently missing / goes missing from education, home or care
- Is at risk of being permanently excluded from School
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child

## 15.2 Children with Special Education Needs and Disabilities

Additional barriers may exist to recognising abuse, neglect or exploitation in this group of children. These can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury relate to the child's impairment without further exploration.
- The risk that children with SEN and disabilities may be disproportionately impacted by things like bullying, without showing any outward signs.
- Communication barriers and difficulties.
- Reluctance to challenge carers.
- A disabled child's lack of understanding of abuse.
- An increased risk that the child is socially isolated.

Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.

# UPPINGHAM

It is important that staff are aware of these barriers and remain alert to the possibility of a child with SEN or a disability being neglected, abused or exploited. The School endeavours to provide such additional support as these children may require, including assistance from the Learning Support, Medical and Pastoral teams.

## 15.3 Children with Mental Health Needs

A mental health issue which is significant enough to pose a risk to a child's safety or long-term progress may amount to a safeguarding concern in its own right. Staff should also be aware that in some cases mental health problems may be an indicator a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences can impact on their behaviour and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, other staff are well placed to observe children day-to-day and identify any whose behaviour suggests that they are experiencing a mental health problem or at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by reporting this to the Safeguarding Team.

## 15.4 Trauma-Informed Practice

Trauma, particularly in early childhood, can have a severe impact on a child's later life. It can be expressed through behavioural issues and have a significant effect on both mental and physical health. Children who have experienced trauma may be more likely to be drawn into violence and criminal and are more likely to engage in health-harming behaviours.

Traumatic events in childhood are sometimes referred to as "adverse childhood experiences" (ACES). These can include significant bereavement (especially when a family member dies by suicide); experiencing violence, abuse, neglect or exploitation; seeing, hearing or experiencing the effects of domestic abuse; or living in household where there is instability due to parental mental health problems or substance misuse.

Adults in School can help reduce the impact of trauma through trauma-informed pastoral practice. This means understanding how trauma can affect individuals, seeing beyond behaviours to the feelings that lie behind them, and working with the child in a way that does not re-traumatise them. Key principles include affording the child an environment which is both physically and emotionally safe, working *with* them rather than doing things *to* them, giving them meaningful choices about what happens, building trust and empowering them to identify their own solutions, and seeing beyond stereotypes to the individual.

Where a child discloses that they have experienced an earlier trauma, staff should not assume that this is already known to the School, and report it as a safeguarding concern, even if the events took place many years ago.

## 16. Children Missing or Absent from Education

When children have unexplainable and/or persistent absences from education, this may be a warning sign of a number of safeguarding risks. For this reason, the School monitors the attendance of all its pupils rigorously and will always question unexplained or unauthorised absences. If necessary, a referral will be made to Social Care.

The School has a duty to inform the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of ten school days or more. A pupil is deemed to be 'missing education'

- If he or she fails to attend school without sufficient explanation;
- Or if he or she is withdrawn from Uppingham and the School is unable to confirm that appropriate arrangements have been made for their education to continue.

# UPPINGHAM

All staff should be aware that a child going missing from school (particularly repeatedly or without explanation) can be a sign of other safeguarding risks. This may include abuse, neglect, or exploitation (particularly County Lines); mental health problems, substance abuse; and a risk of travelling to conflict zones, female genital mutilation or forced marriage.

More information can be found in the School's [Recording Attendance And Children Missing From Education Policy](#) and [Policy for Pupils Absent for an Extended Period](#).

## 17. Private Fostering Arrangements

A private fostering arrangement is one that is made without the involvement of a local authority for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

When the School is made aware of such an arrangement, it is under a duty to report this to the child's local authority. This report will be made by the Designated Safeguarding Lead.

Further information can be found in the [Replacement Children Act \(1989\) Guidance on Private Fostering](#).

## 18. Child on Child Abuse

### 18.1 Child on Child Abuse

Any type of abuse may be inflicted by peers. However, it is most likely to include:

- bullying (including online bullying)
- physical abuse e.g. hitting, kicking, shaking, biting, hair pulling
- sexual violence and sexual harassment, including upskirting
- unwanted distribution of sexual images ('YPSI')
- initiation / hazing type violence and rituals.

Child on child abuse is more common than adults tend to think. Staff should be aware that it may be happening at Uppingham even if no cases have been reported, and be vigilant.

Child on child abuse may be experienced by any child, but it is more common for boys to be perpetrators and for girls to be victims. It may be associated with prejudiced and discriminatory attitudes: for example, on grounds of gender, sexuality, ethnicity or religion. Children with Special Educational Needs or disabilities are also more vulnerable than others. Abuse may also occur in intimate personal relationships between young people.

The boarding environment is recognised to represent an additional risk of child on child abuse as young people live in close and extended proximity to one another, including overnight. The induction and training of boarding staff will ensure they are aware of the particular risks of boarding accommodation, the need to promote a safe culture, the importance of ensuring adequate supervision of boarders, and other practical measures to ensure boarders welfare.

Uppingham has a zero-tolerance policy towards all forms of child on child abuse. It is particularly important for staff to understand that 'abuse is abuse' and should never be tolerated or passed off as "banter" or "part of growing up". The School's response to incidents of child on child abuse will be guided by its [Anti-Bullying and Behaviour and Discipline Policies](#) and may, where appropriate, also involve a referral to other agencies such as the police or Social Services.

It may be appropriate to suspend a pupil against whom an allegation of abuse has been made from School while an investigation is carried out, both to protect them and to ensure fair process. However, the School will do all it can to support all parties involved with the allegation, both during and after the investigation period.

# UPPINGHAM

Where necessary, risk-assessments will be carried out and pupils separated from one another in class, activities and the boarding house. Peers of those involved will be warned of the harmful nature of speculation and actively discouraged from engaging in comment.

Under the Boarding School Association's ['Commitment to Care' Charter](#), BSA will be notified of any allegation of child-on-child abuse, as soon as it is permissible to do so. The school's report to BSA will include an outline of the allegation and external agencies that have been involved. It will not include any information that might identify individuals involved.

## 18.2 Bullying

The School is determined that no kind of bullying (including online bullying) will be tolerated, and victims appropriately supported. The School's [Anti-Bullying Policy](#) should be read alongside this policy. The policy takes account of the DfE guidance document, [Preventing and Tackling Bullying](#) (July 2017).

A bullying incident should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In this instance, normal safeguarding reporting procedures will be followed. Where the legal threshold is met, a referral will be made to the police.

## 18.3 Child on Child Sexual Violence and Harassment

Exploration of sexual identity is a normal and natural part of teenage development and, in most children, will occur in safe and healthy ways. However, individual risk-factors, peer-group dynamics and societal problems (such as exposure to online pornography) may cause some young people to behave in ways which expose both them and others to risk of harm.

Any kind of sexual activity between pupils is forbidden at school (one of the few 'Cardinal Rules'), but this is only one way in which the school endeavours to keep all its members safe.

### 18.3.1 Recognising

Sexual violence and sexual harassment exist on a continuum and may overlap. They may take many forms, including grabbing bottoms, breasts and genitalia; pulling down trousers; flicking bras and lifting up skirts; making unwanted requests for nude images or sharing them without consent; and coercive sexual relationships. Abusive behaviour can occur within an established relationship or outside; online or through face to face contact; and take physical or verbal form. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.

Sexual violence and sexual harassment can occur between children of any age and sex. They can also occur when a group of children sexually assaults or harasses an individual child or group. Some groups of children may be more vulnerable, for example girls, those experiencing mental health difficulties, or those who have experienced the effects of domestic abuse. Some groups of children may find it harder to complain than others: for example, girls and those who are lesbian, gay, bisexual or gender-questioning.

There is evidence that some forms of abusive sexual behaviour (e.g. requesting nudes) are so common among young people that they are considered 'normal' and rarely reported to adults. Equally, it may be difficult for children to disclose sexual violence and staff should be aware that disclosures may not be immediately after the event and may not be direct. Staff should assume that sexual harassment, online sexual abuse and sexual violence are happening in and around school, even when there are no specific disclosures. They should also be aware that children may show signs or act in ways which they hope adults will notice, and therefore report any incidents they suspect to have occurred as safeguarding concerns, even if they have not witnessed them personally.

# UPPINGHAM

## 18.3.2 Responding

Uppingham School does not tolerate sexually abusive behaviour. It is always unacceptable. Where staff witness such behaviour, they must both challenge and report it. As well as supporting victims, staff should be alert to pupils who engage in harmful sexual behaviours and seek intervention for any who display them.

As part of the School's efforts to build a culture that is respectful and inclusive, staff should be confident to challenge sexist, inappropriately sexualised or intimidating remarks which they overhear. The Relationships and Sex Education (RSE) curriculum will aim to help pupils understand healthy and respectful relationships, build body confidence and self-esteem, and explore issues such as gender roles, stereotyping, equality and prejudiced behaviour.

As with any safeguarding issue, members of staff should treat a child's disclosure of sexual harassment or violence seriously, reassure them that they were right to make the report, listening to them carefully and without judgement. Victims should never be made to feel ashamed for making a report. It is important to explain that, whatever has happened, the law is in place to protect children and young people rather than criminalise them.

The school's response to a disclosure will include appropriate support for the pupil who made it, the alleged perpetrator and other members of their family. It may include support to allow any alleged perpetrator(s) to address his / her harmful sexual behaviour and prevent further harm being caused in the future. An external referral may be considered: Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

## 18.3.3 Reporting

The School promotes and encourages reporting of all incidents, and will take all concerns seriously. Pupils can report directly to any member of staff or anonymously if they wish, through MyVoice.

Staff should report less serious incidents (e.g. single instances of unacceptable language) on PIMS using the "prejudice-based incident" tag. Other incidents should be reported as safeguarding concerns.

## 18.3.4 Referring

Where a disclosure of sexual violence or harassment (including online incidents) is made by a pupil, the safeguarding team will consider an internal response and referral to the police, Social Care or other external agencies. In responding to the disclosure, the school will take the wishes of the victim into account, and be mindful of guidance in Part 5 of [KCSIE](#).

In some instances, the victim may ask the school not to tell anyone about the sexual violence / harassment they have experienced. In such instances, the Safeguarding Team will seek to balance the victim's wishes against their duty to protect the victim and other young people.

## 18.3.5 Risk assessment

When there has been a report of sexual violence, the Safeguarding Team will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator(s);
- all the other pupils (and, if appropriate, staff) at the school especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms;
- the time and location of the incident, and any action required to make the location safer.

# UPPINGHAM

Risk assessments should be recorded and kept under review. At all times, the school should actively consider the risks posed to all their pupils and students and put adequate measures in place to keep them safe.

In developing risk assessments it is likely that the school will engage with Social Care and other specialist services.

## 19. Safeguarding within the Curriculum

The school is under a duty to prevent harm. It therefore teaches pupils about the risks they may face and what they can do to keep themselves safe. Uppingham provides a curriculum that aims to raise awareness among pupils about keeping safe, to raise self-esteem and give confidence to share concerns with adults in the school. This includes opportunities in the Wellbeing and broader pastoral curriculum for children to develop skills they need to recognise abuse and stay safe. Pupils will be helped to consider issues including

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support;
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

## 20. Online Safety

Digital and online technologies are integral to the lives of young people, within school and outside. They bring many personal and educational benefits, but also present risks. Any form of harm that a young person may experience in the physical world has its online equivalent and it is vital that staff have a good understanding of pupils' online world.

This section summarises some of the key measures which the school adopts to keep pupils safe online. Further detail can be found in the separate [Online Safety Policy](#).

The breadth of online safety risks is considerable, but can be categorised into four areas:

- Content - being exposed to illegal, inappropriate or harmful content.
- Contact - harmful online interaction with other users, including grooming or exploitation.
- Conduct - personal online behaviour that increases the likelihood of harm e.g. sending / receiving explicit images or online bullying
- Commerce - risks such as online gambling, phishing and or financial scams

Pupils are educated and reminded regularly about online safety and required to read, understand (through tutor guidance) and sign an Acceptable Use Agreement on an annual basis in order to access the School's information technology services.

The DSL is responsible for all matters relating to online safety with the School. This includes retaining lead operational responsibility for ensuring that pupils who use the School network do so safely, and working closely with the IT Director to ensure effective safeguards are in place. The School operates appropriate monitoring and filters to prevent children accessing inappropriate websites through the School's computer network and alert staff to any inappropriate sites which might be visited. These comply with DfE's [filtering and monitoring standards for schools and colleges](#) (2022, updated October 2024) and their effectiveness of these is reviewed by the IT Director at least annually. Staff are briefed so they have an understanding of the provisions in place, how to manage them effectively and how they can escalate concerns when identified.

# UPPINGHAM

Almost all pupils will also have access to the internet through 3G / 4G and 5G mobile data accessed through the phones and other devices. While the School is not in a position to monitor this directly without unacceptable and unworkable levels of intrusion, it educates pupils in the risks they may face, encourages responsible usage, sanctions any instances of unacceptable use, and responds to any online safety incidents.

There may sometimes be a need for staff to teach or have pastoral contact with pupils online (e.g. by a video-conferencing application such as Zoom). Staff should follow the Guidelines for Online Learning published in the [Online Safety Policy](#) to ensure they do this safely.

## 21. Photography and Images

The vast majority of people who take or view photographs / videos of children do so for entirely innocent and acceptable reasons. However, to protect children from potential harm, the School has a [Use of Images Policy](#) which both staff and parents are asked to follow. The Staff Code of Conduct (see below, Appendix 4) requires that staff do not take photographs of pupils on personal equipment or share images of pupils outside the School without explicit permission.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult and report the matter to the DSL as soon as possible. The police will be informed in cases of serious concern.

CCTV is located around the School but is not installed in classrooms, changing rooms or toilet areas. All surveillance within the School is overseen by a data controller registered with the Information Commissioner's Office.

## 22. Policy Review Process

The DSL will monitor the operation of this policy and its procedures.

Staff and pupils have opportunities to shape safeguarding arrangements and the Child Protection Policy through informal feedback and formal focus groups. The Director of Safeguarding, DSL, and other members of the Safeguarding Team welcome offer thoughts and suggestions at any time.

The Trustees will undertake an annual review of the policy and ensure that any deficiencies or weaknesses in regard to child protection arrangements are rectified without delay.



# UPPINGHAM

## APPENDIX 1: How to Report Concerns

Contact details for all the people / organisations mentioned in this advice are on pages 4 to 6 of this Policy and the [UPPNet Safeguarding Hub](#).

### What to do if you have a safeguarding concern about a pupil

|   |  |
|---|--|
| <p><b>1. Ensure the pupil is safe</b></p> | <ul style="list-style-type: none"> <li>- Assess if they are at immediate risk</li> <li>- Ask if they need someone to stay with them</li> <li>- Summon help from a colleague if necessary</li> </ul>  |
| <p><b>2. Report your concern</b></p>      | <p><b>If the pupil is at immediate risk</b></p> <ul style="list-style-type: none"> <li>- Contact a member of the Safeguarding Team in person or by phone.</li> <li>- In the unlikely event you cannot quickly contact the Safeguarding Team, you should take action to keep the pupil safe yourself (for example, contacting medical or mental health services, the police or Social Services). Please inform the Safeguarding Team what actions have been taken as soon as you can afterwards.</li> </ul> <p><b>If there is no immediate risk</b></p> <ul style="list-style-type: none"> <li>- Raise a report on MyConcern, giving details of your reasons for concern and any actions you have taken.</li> <li>- If you do not have access to MyConcern, contact the Safeguarding Team in person, by phone or by email (but please do not share confidential details in an email). They will ask you to record your concern in writing and tell you how to do this.</li> </ul> |
| <p><b>3. Follow Up</b></p>                | <ul style="list-style-type: none"> <li>- A member of the Safeguarding Team should confirm that they have received your report and acted on it within 24 hours. Contact them again if you do not hear anything.</li> <li>- In the unlikely event you think the Safeguarding Team has failed to act to protect the pupil, you should consider making a direct referral to Social Services (or other appropriate agency) yourself.</li> </ul>   |

### What to do if you have a concern about the conduct of a colleague

|                                      |  |
|--------------------------------------|--|
| <p><b>1. Report your concern</b></p> | <ul style="list-style-type: none"> <li>- If you have a safeguarding concern, contact the Headmaster, in person, by phone or by email. The Safeguarding Team and HR Director will help you if you are worried about doing this.</li> <li>- If your concern is about the Headmaster, contact the Chair of Trustees.</li> <li>- If you have a Low Level Concern, this should be reported to the DSL or Senior Deputy Head.</li> </ul> |
| <p><b>2. Follow Up</b></p>           | <ul style="list-style-type: none"> <li>- In the unlikely event you think the School has failed to act on your report appropriately, you should share your concerns with the LADO at Rutland County Council.</li> <li>- If you have wider concerns about the School's response, you can contact the NSPCC Whistleblowing Advice Line.</li> </ul>  |



# UPPINGHAM

## APPENDIX 2. Understanding Abuse and Neglect

To ensure that children are protected from harm, we need to understand the types of behaviour that constitute abuse and neglect.

Abuse and neglect are both forms of maltreatment.

- **Abuse** happens when someone inflicts harm on a child (e.g. hitting them)
- **Neglect** occurs when someone fails to act to prevent harm (e.g. not seeking medical treatment for an injury).

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

### 1. Indicators of Abuse and Neglect

Part One of [Keeping Children Safe in Education](#) describes four categories of abuse and neglect, and a variety of specific safeguarding issues. Staff should be aware of all of them, and their warning signs. It is important to realise that safeguarding issues are not usually single events that fit neatly into one particular category. In many cases, you might see multiple issues overlapping.

#### Physical Abuse

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.

#### Emotional Abuse

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 online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 of abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and of their school policy and procedures for dealing with it.

#### Neglect

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

# UPPINGHAM

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.

## 2. Signs of Abuse or Neglect

While the signs described here should cause staff to be concerned for a child, they are not necessarily evidence of abuse. In some cases, there may be other explanations. However, these signs must always be reported, so the underlying cause can be investigated properly.

- Changes in behaviour e.g. aggression, challenging, disruptive, withdrawn or clingy; difficulty sleeping or bed-wetting
- Aggressive or bullying behaviour
- A 'don't care' attitude
- Deterioration in work or attitude
- Socially isolation
- Ill-fitting and/ or dirty clothes
- Consistently poor personal hygiene
- Problems at school: e.g. sudden lack of concentration and learning, or appearing tired and hungry
- Drinking alcohol regularly
- Strong efforts to avoid specific family members or friends, without obvious reason
- Reluctant to go home at exeat or holiday periods, or fear of parents being contacted
- Concerned for younger siblings without explaining why
- Avoiding changing clothes in front of others, or avoiding participation in physical activities
- Shy away from being touched or flinch at sudden movements.
- Being left at home alone, with inappropriate carers or with strangers
- Regularly missing from education
- Poor school attendance and punctuality, or consistently late being picked up
- Talking about running away
- Parents dismissive and non-responsive to concerns
- Parents collect children from school when drunk, or under the influence of drugs
- Unexplained injuries;
- Fabricated or self-induced illness;
- Self-harm.
- Eating disorders, depression/ withdrawal, or low self-esteem
- Compulsive stealing

No list of abuse or neglect indicators can include all signs, and staff are advised to use their best judgement. If you are concerned, then further advice is available in the government document [What To Do If You're Worried A Child Is Being Abused](#) (March 2015).

# UPPINGHAM

## APPENDIX 3. Further Information on Safeguarding Issues

[KCSIE](#) contains important additional information about specific forms of abuse and safeguarding issues. All staff must read Part One while school leaders and all staff who work directly with children must also read Annex B. The Further Information in Annex B includes important discussion of

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County Lines
- Children and the court system
- Children missing from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern slavery and the National Referral Mechanism
- Preventing radicalisation (the Prevent duty and Channel)
- Sexual violence and sexual harassment between children in schools and colleges
- Serious violence
- So-called 'honour-based' abuse (including Female Genital Mutilation and Forced marriage)

Several organisations provide up-to-date guidance and practical support which may be useful as staff seek to develop their understanding of safeguarding issues. A wide range of materials is available in the [Pastoral Knowledge Centre of the UPPNet Safeguarding Hub](#), for example, and the NSPCC offers information for schools at <http://www.nspcc.org.uk>.

# UPPINGHAM

## APPENDIX 4. Staff Code of Conduct

A vital part of our wider safeguarding duty as staff is to ensure that our behaviour is at all times safe, professional, compassionate and wise. This keeps children safe, and ensures that our actions are not misinterpreted. The following Code of Conduct is a brief guide to safe working. More detailed guidance can be found in [Guidance for safer working practice for those working with children and young people in education settings](#) (Safer Recruitment Consortium, 2022).

---

Uppingham is a school that prides itself on education of the whole child, supported by a deep level of pastoral care. We believe it is this pastoral provision in its fullest sense that makes Uppingham the very special boarding school that it is. Our culture is based upon a high degree and quality of contact, formal and informal, between pupils and staff.

With this contact comes a requirement for the highest standards of care and behaviour from adults working with our pupils, whatever their role. As a result of their age, knowledge and position, and the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care.

All staff have a duty to ensure that they are familiar with and follow the policies and practices outlined in this Code of Conduct and their respective staff handbooks. However, these documents cannot provide a complete checklist of what is, or is not, appropriate behaviour and all dealings with pupils must be guided by sound professional judgement and common sense.

Failure to comply with this Code of Conduct may lead to disciplinary action being taken under the School's disciplinary procedure, up to and including dismissal. More serious breaches may also lead to criminal prosecution.

### **Presentation and Manner**

#### Staff must:

- Lead by example, conducting themselves in a professional manner towards colleagues, visitors, pupils and parents at all times and providing a good role model for pupils.
- Present a positive image of the School to the wider community and be a good ambassador at all times.
- Wear clothing that promotes a positive and professional image and is not likely to be viewed as scruffy, offensive, revealing or sexually provocative.
- Never use language that is inappropriate (for example, confrontational, abusive, obscene, suggestive or sexual) about, or in the presence of, a pupil.

Teaching staff must further ensure that their personal and professional conduct upholds public trust in the teaching profession, maintaining high standards of ethics and behaviour, within and outside school, as outlined in Part 2 of the [Teachers' Standards](#) (DfE, 2021).

### **Health & Safety**

#### Staff must:

- Exercise their duty of care towards pupils and take all reasonable steps to ensure the safety of pupils and other staff by following the Health and Safety policy and guidelines.
- Not condone any illegal drinking, drug-taking, smoking or other breaches of School rules by pupils.
- Ensure medication, first aid and intimate care are administered according to relevant procedures.
- Not be under the influence of alcohol or illegal drugs when at work, and exercise due caution when taking prescribed medication that may impair performance. For resident staff, 'at work' includes any time when they 'on duty' and directly responsible for pupils. At social events where pupils are present and alcohol is offered, those members of staff who are 'on duty' must be clearly identified; other staff may consume alcohol in moderate quantities.

# UPPINGHAM

## Contact and Relationships with Pupils

### Staff must:

- Not misuse their power and influence over children.
- Never conduct any form of sexual or otherwise inappropriate personal relationship with a pupil; touch a pupil in a way that may be considered indecent; communicate with a pupil in a way which could be interpreted as sexually suggestive, provocative or give rise to speculation; make sexual remarks to or about a pupil; or discuss their own sexual relationships in the presence of pupils.
- Never engage in a sexual or intimate encounter, or conduct a sexual or intimate relationship with a recent former pupil that had its grounding in a staff-pupil connection. In this context, “recent” applies to any case where the staff-pupil relationship ended less than three years previously. To avoid any appearance of secrecy, any sexual or intimate relationship with someone with whom a pupil-staff relationship has ever existed should be declared to the Designated Safeguarding Lead at the earliest opportunity.
- Be aware that it is not uncommon for pupils to develop an infatuation with a member of staff, and recognise that it is their responsibility to maintain appropriate personal and professional boundaries. If an infatuation seems to be developing, the member of staff should take urgent steps to discuss the matter with a senior colleague.
- Be mindful of situations where a pupil (or parent) comes to depend on them for support outside their role and discuss this promptly with a senior member of staff.
- Generally avoid physical contact with a pupil, except where this is clearly required by the role the member of staff is performing. In all cases, the member of staff should consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact. If physical contact is made (for example with a distressed pupil), this should be in response to their pastoral need at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. The member of staff should be ready to justify their use of physical contact. Use of physical control / intervention is very rarely required at Uppingham, but if required (for example to avoid the pupil harming themselves or others), should be applied in accordance with Uppingham’s Use of Reasonable Force Policy.
- Exercise care when ‘lone working’ with a pupil and ensure that, wherever possible, this takes place in an area which easily visible to others. Staff should avoid 1:1 working with pupils at times or places where it is likely that other people will not be around. Where it is necessary to conduct a tutorial in a pupil’s room, the staff member should check that the pupil is comfortable with this arrangement and that the door is left open.
- Not meet pupils in a member of staff’s private accommodation or permit pupils to access such accommodation unless in exceptional (i.e. emergency) circumstances.

## Digital and Online Communications

### Staff must:

- Keep communication with pupils to the point, business-like and unambiguous.
- Only send emails from a school account. Personal email accounts should not be used to communicate with pupils.
- Not give pupils their personal mobile telephone number or send text messages from a personal phone, unless a specific emergency situation requires it. In this case, the event should be recorded and logged, and the pupil asked to delete the number.
- Not befriend, or accept as a friend, any pupil online.
- Not have contact with pupils on any social media platform, messaging service, chat room *etc*, with the exception of properly authorised and monitored official school accounts.
- Exercise care and judgement in communicating with recent former pupils who are under the age of 21. Ideally, such communication would occur through a school email account. If taking place on other platforms, there should be a clear and justifiable reason for communication to take place that is related to the member of staff’s professional role (e.g. contact through a professional networking site such as LinkedIn.)
- Arrange privacy settings on social networking sites so as to block visibility to current pupils.

# UPPINGHAM

- Contact the Designated Safeguarding Lead for guidance if their individual circumstances might justify an exception being made to the rules above – for example, to permit social media contact with close family members or close family friends.
- If a staff member's online profile identifies their connection with the School, they should ensure that all posts/ activity are professional and not post or promote any communication that might bring the school into disrepute.

## **Confidentiality**

### Staff must:

- Not take photos of pupils on personal equipment. Photos remain the property of the School and should not be shared outside the School without explicit permission. (This includes using personal accounts on messaging apps such as WhatsApp to share images, even if these were taken on school equipment.)
- Respect and preserve confidentiality when in receipt of information about pupils and their families, both in general terms and in accordance with the specific requirements of the Data Protection Act (2018).

## **Children of Staff who are Pupils at the School**

### Staff must:

- Deal with the children of other staff members in the same way as any other pupil. This includes following all normal safeguarding procedures, applying discipline in the usual way, and respecting the pupil's right to privacy and (in some cases) confidentiality.
- Use the school's usual, formal channels for communication with parents when sharing information about the child of a staff member. This is particularly important with respect to information about academic progress, pastoral welfare and disciplinary incidents.
- Follow the same procedures as other parents if they have a child at the school and wish to discuss their child with a colleague – for example, emailing to request an appointment.

## **Duty to Report Concerns**

### Staff must:

- Report to the Safeguarding Team, without delay, any suspicion or disclosure which indicates a child may be at risk of harm or suffer abuse.
- Report, as directed in the School's Safeguarding (Child Protection) Policy, any breach of this Code of Conduct or other concern that a member of staff or volunteer may pose a risk of harm to children. This includes reporting so-called Low-Level Concerns, as outlined in the School's *Guidance for Reporting, Managing and Recording Low Level Concerns*.
- Self-report, if they believe that their own conduct may have fallen short of the principles outlined in this Code of Conduct.
- Act in accordance with the School's Whistleblowing Policy, if they believe that the School has failed to act on their legitimate concerns.

# UPPINGHAM

## APPENDIX 5. Low Level Concerns Policy

### 1. Purpose of this Guidance

Openness, confidence and trust are the foundation of a good safeguarding culture. Uppingham wants everyone in the organisation to have confidence reporting any worries about what they see or hear and to know that their concerns will be acted on promptly and proportionately.

The purpose of this guidance is to:

- Embed a culture of transparency, where the values and behaviours set out in the Staff Code of Conduct are consistently lived and upheld;
- Ensure adults working in the School are clear about professional boundaries and act within them;
- Ensure the School has confidence that any concerns relating to a staff member's attitudes or behaviour are reported and recorded immediately.
- Identify concerning, problematic or inappropriate behaviour early and minimise the risk of abuse;
- Ensure staff are confident that any concerns about their own conduct will be handled fairly and proportionately.

### 2. What Is a 'Low Level Concern'?

[Keeping Children Safe in Education](#) defines a 'low level' concern as any worry (no matter how small and even if no more than a sense of unease or nagging doubt) that an adult working in 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 / is not considered serious enough to consider referral to the LADO.

Examples of such behaviour could include things such as 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; or humiliating pupils. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, to the clearly inappropriate, through to that which is ultimately intended to enable abuse.

The term 'low level' does not mean the concern is unimportant. Research into serious safeguarding failures has repeatedly emphasised that noticing, reporting and addressing issues at an early stage can prevent much more serious problems developing later. Something which appears relatively minor at first can take on much greater significance when it is recognised to be part of a pattern of behaviour.

It may not always be clear whether something is a 'low-level concern', a safeguarding concern or nothing at all. In such instances, members of staff must share their concerns with the Designated Safeguarding Lead (DSL) who will make the decision.

If a concern is clearly a safeguarding concern, staff must follow the procedure for reporting this set out in the Safeguarding (Child Protection) Policy.

### 3. Reporting Low Level Concerns

It is important that low level concerns are reported as soon as possible – preferably, within 24 hours of the concern arising. However, it is never too late to share a concern and staff should not be afraid to come forward if later reflection has occurred.

Staff must refer low-level concerns to the Designated Safeguarding Lead (**Rebecca Kay**), either verbally or by email. If the DSL is absent or cannot be contacted within a reasonable timescale, then concerns should be reported to the Senior Deputy Head (**Karl Wilding**). To ensure a timely response, concerns raised during school holidays may also be reported to the Uppingham Enterprises Manager (**Richard Poole**) who will liaise with the DSL or Senior Deputy Head in managing the initial response.

If a low-level concern relates to the behaviour of the Designated Safeguarding Lead or Senior Deputy Head, it should be shared with the Headmaster (**Richard Maloney**). Any concerns about the Headmaster should be



# UPPINGHAM

shared with the Chair of Trustees (**Barbara Matthews**), and any concerns about the Chair of Trustees with the Rutland LADO.

Where a low-level concern relates to a colleague employed by an agency or contractor, the report should still be made to the DSL, who will notify and liaise with the ultimate employer. The DSL will also make their own report to the LADO, if this is deemed necessary (see section 12 of the main Policy).

The DSL manages concerns on behalf of the headmaster and will inform him of every low-level concern within 24 hours of receiving the initial report.

## 4. Self-Reporting

We all make mistakes. Occasionally, a member of staff may find themselves in a situation which could be misinterpreted or appear compromising to others. Equally, they may feel they have behaved in a way which, on reflection, they consider falls below the standard set out in the Code of Conduct.

In such circumstances, the best course of action is always to come forward, explain what has happened and seek advice. Self-reporting is positive for several reasons:

- It is a form of self-protection for the member of staff, showing they understand there may be an issue;
- It enables issues to be addressed at the earliest opportunity;
- It shows awareness of the expected standards and self-awareness of how actions might be perceived;
- It strengthens a culture where everyone aspires to the highest standards of conduct and behaviour.

## 5. Anonymous Reports

In cases where a low-level concern has been reported anonymously, reasonable steps will be taken to determine the accuracy and significance of the information. However, because anonymous reports can be more difficult to follow up, staff are strongly encouraged to share their concerns personally.

## 6. Confidentiality

The School encourages openness and transparency in sharing concerns. However, if the person who raises a concern does not wish to be named, the School will respect their wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, in order to carry out a fair disciplinary investigation) and therefore anonymity can never be definitively promised.

## 7. Response to Reported Low-Level Concerns

Uppingham is committed to responding proportionately to all reported concerns and seeks to avoid a 'blame culture'. Any response to a low level concern will seek to recognise mitigating factors and consider whether inadequate training or inadequate support have played a role in an incident.

After the low-level concern has been received, the DSL will convene a short meeting with the Headmaster and Senior Deputy Head. The meeting will take place as soon as reasonably practical - normally within 24 hours of the concern being received. It will review the information that is known at that point, triage the concern, and determine what action needs to be taken next. The meeting will consider

- Whether there was any intent to cause harm or distress and whether, in fact, harm or distress occurred;
- The level of harm that occurred;
- Whether ill health impacted on the incident;
- Whether policies and procedures relevant to the incident were in place, and whether these were understood by the staff member and colleagues in general;
- Whether others are likely to have responded similarly in the same circumstances;
- Whether other similar incidents have occurred in the past;
- Whether there are significant mitigating factors to be taken into account.

On this basis, the meeting will determine next steps. These may be that

- No further action is required;
- Further investigation (including more detailed conversation with the subject of the concern) is required;
- Reflection should be completed with a senior colleague;
- Additional training is required.

# UPPINGHAM

- The subject of the concern should be placed on restricted duties and the School Disciplinary Policy followed.
- The subject of the concern should be suspended and the School Disciplinary Policy to be followed.
- The concern meets the threshold for a potential safeguarding concern and advice from / referral to the LADO is required.

Throughout the process, all relevant guidance will be taken into account, including Part 4 of [Keeping Children Safe in Education](#), the School's [Safeguarding \(Child Protection\) Policy](#) and [procedures of the Leicestershire and Rutland Safeguarding Children Partnership](#).

## 8. Response where a concern is not substantiated

Where a concern is not substantiated, the DSL will nonetheless

- inform the individual in question what was shared about their behaviour and give them an opportunity to respond;
- speak to the person who shared the low level concern and explain why the concern was not substantiated;
- consider whether the low level concern may indicate that:
  - the Code of Conduct is not clear;
  - briefing and / or training has not been satisfactory;
  - guidance is not sufficiently clear or understood by staff.

If, after appropriate investigation, the DSL believes that a reported low-level concern is without substance *and* the report was made with malicious intent, then disciplinary action may follow against the person making the report. However, this would be an extremely rare event and no one with a genuine concern should be afraid of sharing it.

## 9. Whistleblowing

If a member of staff feels the School has not acted upon a low level concern sufficiently seriously, they should first raise the matter with the DSL and, if still not satisfied, with the Headmaster. If still dissatisfied, they should consider whether they have a duty to share their concerns outside the School. The School has a published [Whistleblowing Policy](#) which demonstrates how staff can do this without fear of reprisal. Contact details for the [NSPCC's Whistleblowing Advice Line](#) can also be found in the Safeguarding (Child Protection) Policy.

## 10. Record-Keeping

All records relating to low level concerns are stored securely format and only people with a justifiable need have access to them. Records are stored in accordance with GDPR principles.

## 11. Referring to Low-Level Concerns in References

Low level concerns will not be referred to in references unless they relate to issues which would ordinarily be included (for example, misconduct or consistently poor performance). A low level concern relating exclusively to safeguarding (and not misconduct or poor performance) will not be referred to in a reference. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO or other agencies and was subsequently found to be substantiated (in whole or in part), it will be referred to in a reference.

# UPPINGHAM

## APPENDIX 6. Role and Responsibilities of the DSL

In accordance with Annex C of [KCSIE](#) (2023), the main responsibilities of the Designated Safeguarding Lead are to:

### Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### Manage Referrals

- Refer cases of suspected abuse to Social Services
- Support staff who make referrals to Social Services
- Refer cases to the Channel programme where there is a radicalisation concern
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/ harm to a child to the Disclosure and Barring Service.
- Refer cases where a crime may have been committed to the police.

### Work With Others

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Liaise with the headmaster to inform him of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult as outlined in the [Police and Criminal Evidence Act Code C \(2019\)](#)
- As required, liaise with the “case manager” and the LADO for child protection concerns in cases which concern a staff member
- Liaise with staff (especially pastoral support staff, school nurses, the IT Director, Head of Learning Support, Lead Nurse and Lead Counsellor) on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with the senior mental health lead and Mental Health Support Team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents / carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college. This includes ensuring that the school knows which children have / have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for them; and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have / have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

### Information Sharing and Managing the Child Protection File

- Ensure that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

# UPPINGHAM

- Ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part One and Part Two of [KCSIE](#).
- Where children leave the school or college (including in year transfers), ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENDCOs or the named person with oversight for SEN in colleges, are aware as required.
- Consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

## Raise Awareness

- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with trustees regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

## Training, Knowledge and Skills

The DSL and all deputies should

- Undergo training to provide themselves with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- Undertake Prevent awareness training.

Training should provide them with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- Have 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
- Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- Are alert to the specific needs of children in need, those with SEND, relevant health conditions and young carers
- Understand the importance of information sharing, both within the school and with the safeguarding partners, other agencies, organisations and practitioners
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- Can recognise the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses

# UPPINGHAM

- Encourage 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.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

## **Providing Support to Staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

## **Understanding the Views of Children**

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

## **Holding And Sharing Information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts One, Two and Five of [KCSIE](#), and therefore the designated safeguarding lead should be equipped to:

- Understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

# UPPINGHAM

## APPENDIX 7. Related Documentation

This list covers some of the key documents on which the school's safeguarding is based but is not exhaustive.

### 1. Legislation and External Guidance

- [After-school clubs, community activities and tuition: safeguarding guidance for providers](#) (DfE, 2023).
- [Behaviour in schools: advice for headteachers and school staff](#) (DfE, 2022)
- Children Act (1989)
- Children Act (2004)
- [Children Missing Education](#) (DfE, September 2016)
- Counter Terrorism and Security Act (Section 26, 2015)
- Education (Pupil Information) (England) Regulations (2005)
- Education Act 2002 (Section 175/157)
- [Equality Act \(2010\)](#)
- Female Genital Mutilation Act (2003) (Section 74, Serious Crime Act, 2015)
- [Guidance for safer working practice for those working with children and young people in education settings](#) (Safer Recruitment Consortium, 2022)
- [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government, July 2018)
- [Keeping Children Safe in Education](#) (DfE, 2023)
- [Making a referral to Prevent](#) (DfE, 2022)
- [Managing risk of radicalisation in your education setting](#) (DfE, October 2022).
- [Mental Health and Behaviour in Schools](#) (DfE, 2018)
- [National Minimum Standards for Boarding Schools](#) (DfE, 2022)
- [Police And Criminal Evidence Act 1984 \(PACE\) Code C \(2019\)](#)
- [Preventing and Tackling Bullying](#) (DfE, July 2017).
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) (DfE, 2019)
- [Revised Prevent duty guidance: for England and Wales](#) (Home Office, September 2023)
- [Searching, Screening and Confiscation at School](#) (DfE, 2022)
- [Sharing nudes and semi-nudes. Advice for education settings working with children and young people](#) (UKCIS, 2024)
- Sexual Offences Act (2003)
- [Teaching online safety in school](#) (DfE, June 2019)
- [When to call the police. Guidance for schools and colleges](#) (NPCC, 2020)
- [Working Together to Safeguard Children](#) (HM Government, December 2023)

### 2. School Policies and Guidelines

- Anti-Bullying Policy
- Behaviour & Discipline Policy
- Business Support Staff Handbook
- Conducting a Search Policy
- Drugs and Harmful Substances Policy
- Educational Visits Policy
- Guidance for Reporting, Managing and Recording Low-Level Concerns
- Health & Safety policies
- Intimate Care Policy
- Management Of Suicidal Thoughts and Suicide Risk
- Mental Health Policy
- Missing Pupil Procedure
- Online Learning Safeguarding Guidance
- Online Safety Policy
- Pastoral Care Policy
- PHSE Policy

# UPPINGHAM

- Policy For Dealing with Allegations of Abuse Against Teachers and Other Staff
- Policy On Obtaining Overseas Criminal Records Checks as Part of Safer Recruitment
- Policy for Pupils Absent for an Extended Period.
- Promoting British Values Policy
- Protocol - Use of Firearms by Pupils/Staff with Specific Health Issues
- Pupil Confidentiality Policy
- Recording Attendance and Children Missing Education Policy
- Recording Low Level Concerns Policy
- Recruitment, Selection and Disclosure Policy and Procedure
- Relationships & Sex Education Policy
- Safer Recruitment Guidance for Using Coaches, Sports Referees And Volunteers
- Self-Harm Policy
- Staff Code of Conduct with Pupils
- Staff Handbook (Academic)
- Staff Handbook (Support)
- Staff Handbook (VMT)
- Use of Images Policy
- Use of Reasonable Force Policy
- Visiting Speaker Policy
- Visitor Policy
- Whistleblowing Policy



# UPPINGHAM

## APPENDIX 8: Summary of Revisions to this Policy

### January 2025

- Changes to reflect DSL maternity leave and new arrangements for leadership of safeguarding.
- Minor wording changes to improve clarity.

### July 2024

- Changes following updates to government guidance: *Keeping Children Safe in Education (2024)*.

### March 2024

- Incorporation of Low Level Concerns Policy (previously stand-alone) into this Policy.
- Update to statutory definition of safeguarding following update to Working Together.
- Minor changes following release of Sharing nudes and semi-nudes. Advice for education settings working with children and young people (UKCIS, 2024)

### January 2024

- Minor updates following release of update to Working Together to Safeguard Children.

### October 2023

- Addition of separate section to clarify complaint / Whistleblowing procedures.
- Updated references following revision of Prevent Duty guidance, September 2023.
- Updated references following issue of After-school clubs, community activities and tuition: safeguarding guidance for providers, October 2023 (replacing Keeping Children Safe in Out of School Settings).

### July 2023

- Changes following updates to government guidance: *Keeping Children Safe in Education (2023)*.
- Minor changes for clarity, emphasis and to reflect changes in practice.
- Update to role descriptions, following re-structuring of safeguarding leadership
- Additional advice for staff on physical contact with pupils.
- New section on trauma-informed practice

### January 2023

- Updated details for DDSLs, following changed to Safeguarding Team.

### October 2022

- Minor changes to reflect revisions to government guidance.

### July 2022

- Changes following updates to government guidance: *Keeping Children Safe in Education (2022)*.
- Changes following updated National Minimum Standards for Boarding Schools (2022).
- Addition of new section to clarify FGM reporting procedures.
- Reordering of material for clarity and emphasis.
- Minor revisions to Staff Code of Conduct.

### October 2021

- Additional information on radicalisation, extremism and the Prevent Duty.

### July 2021

- Changes following updates to government guidance: *Keeping Children Safe in Education (2021)* and *Sexual violence and sexual harassment between children in schools and colleges (2021)*.

### May 2021

- Stronger emphasis on sexual harassment / violence as safeguarding issues.
- Addition of simple guide to reporting concerns in appendices.
- Minor changes to improve clarity and sense.
- Minor changes to reflect changes to policies, guidance and helplines.

### December 2020

- Updated contact details for Rutland County Council services.

# UPPINGHAM

- Minor changes following update of Working Together to Safeguard Children.
- Minor changes of wording to emphasise safeguarding in the curriculum and the concept of 'transferrable risk' in considering allegations against staff.
- Minor changes to reflect updates to related school policies.

## **June 2020**

- Changes following updates to government guidance: Keeping Children Safe in Education (2020)
- Updating of guidance in Appendix 2 on specific safeguarding issues.
- Addition of section on children missing education to main policy.

## **May 2020**

- Reordering of material for clarity and emphasis.
- Re-writing of section on peer-on-peer abuse to provide clearer guidance on handling allegations.
- Clarification that all references to bullying include online behaviours.
- Minor revision to Staff Code of Conduct to clarify that Heads of Department informed of an issue that may potentially present a safeguarding risk must inform the Safeguarding Team.
- Addition of new section on mental health difficulties.
- Name and contact details for new Independent Listener (re-titled Independent Pupil Advocate).
- Addition of new section on reporting low-level concerns about colleagues.

## **June 2019**

- Changes following updates to government guidance: Keeping Children Safe in Education (2019)
- Addition of role description for the Independent Listener.

## **May 2019**

- Additional reference to the principles of contextual safeguarding.
- New section on private fostering arrangements.
- Updated section on online safety.
- Expanded section on Child Criminal Exploitation.
- New section on online gambling and social gaming
- Revised Staff Code of Conduct

## **July 2018**

- Changes following updates to government guidance: Keeping Children Safe in Education (2018), Working Together to Safeguard Children (2018), Information sharing: Advice for practitioners (2018)

## **May 2018**

- New section on data protection and right of access to records, in light of GDPR and Data Protection Act (2018)
- New section on reporting allegations and incidents to regulatory / advisory bodies.
- Changes to reflect replacement of LSCBs with local multi-agency arrangements.
- New information on responding to incidents of sexting.
- Expanded information on Early Help, peer-on-peer abuse and bullying.
- New information on sexual violence and harassment, Child Criminal Exploitation and domestic abuse.
- Staff Code of Conduct incorporated into the policy (previously issued as a separate document).
- Appendix outlining duties of the DSL substantially re-written to ensure clarity and compliance with KCSIE.