



Watford Grammar School for Girls

Safeguarding Policy

This policy initially adopted by Board of Governors	Full GB 19.03.18
Approved by FGB	March 2022
Next review date Every two years	March 2024
Committee Responsible	Curriculum 21.02.22

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1. Introduction

1.1. The Purpose of the Policy

Safeguarding is ‘everyone’s responsibility’. This policy sets out Watford Grammar School for Girls responsibilities under the Children Act 2004 to ensure children, young people and adults at risk are kept safe from harm.

The Safeguarding Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school.

In particular this policy should be read in conjunction with the following policies and documents:

- Anti-Bullying
- Attendance
- Behaviour
- Child Protection
- Complaints procedure
- Data Protection
- Educational Visits
- Emergency evacuation and lockdown procedures
- E Safety
- Health and Safety
- Medicines and medical policy, including first aid
- Safer Recruitment
- SEND
- Staff code of conduct
- Whistle-blowing

This policy is available on the school website and is included in the staff handbook.

1.2. Terminology

Safeguarding is defined in Working Together to Safeguard Children (DfE, 2021, p7) as:

- protecting children from maltreatment,
- preventing impairment of children’s health or development,
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking actions to enable all children to have the best outcomes.

The aim of safeguarding is to enable children to have optimum life chances and enter adulthood successfully. All school staff have a responsibility to provide a safe environment in which children can learn.

Child protection is incorporated within the umbrella term of safeguarding. Child protection is the process and activities undertaken to fulfil statutory obligations to protect specific children who have been identified as suffering, or at risk of significant harm. All agencies and individuals should

proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced. (Working Together to Safeguard Children, DfE 2018, p.102)

2. Principles and Aims

Our Principles:

- The welfare of children, and their wishes and feelings are afforded consideration when developing and carrying out school activities
- All children will have equal rights to support and protection irrespective of their race, age, academic achievement, gender, language, religion, sexual orientation and culture
- All staff and volunteers have a professional role to identify and respond to the needs of children and report any concerns immediately

We aim:

- To provide all staff and Governors (employed, contracted and visiting) with the necessary information / training to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children
- To provide parents carers and children with information about the schools arrangements to keep children safe
- To ensure safe and consistent best practice across the school
- To demonstrate the school's commitment with regard to safeguarding children

3. Framework

This policy has been devised in accordance with the following legislation and guidance:

- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry. Includes taking someone overseas to force them to marry, whether or not the forced marriage takes place).
- Arrangements for Managing Allegations of Abuse Against People Who Work With Children or Those Who Are in A Position of Trust, Hertfordshire Safeguarding Children Partnership Interagency Procedures Manual
http://hertsscb.proceduresonline.com/chapters/p_manage_alleg.html
- Children Act 1989
- Children Act 2004
- Children and Social Work Act 2017
- Disqualification under the Childcare Act 2006. Statutory guidance for local authorities, maintained schools, independent schools, academies and free schools, DfE (February 2015)
www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006
- Education Act 2002
Section 157 and the Education Regulations 2003 require proprietors of independent schools (including academies) to have arrangements to safeguard and promote the welfare of children who are pupils at the school.
- General Data Protection Regulation (GDPR) EU Regulation from 25th May 2018. Legislation which will determine how people's personal data is processed and kept safe, and the legal rights individuals have in relation to their own data
- Guidance for Safer Working Practice, Safer Recruitment Consortium (May 2019)
- Information Sharing: Advice for practitioners, DfE (July 2018)

- Keeping Children Safe in Education (DfE, September 2021)
- The Education (Pupil Information) (England) Regulations 2005
- Sexual Offences Act, HM Government (2003)
- Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty)
- Teachers' Standards 2012, DfE (2011.) These standards set the minimum requirements for teachers' practice and conduct. Teachers, including Headteachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- What to do if you're worried a child is being abused, DfE (March 2015.) Non statutory advice which helps everyone who works with children to identify abuse and neglect and take appropriate action
- Working Together to Safeguard Children (DfE 2018)
- Female Genital Mutilation Act 2003 (Section 74 ,Serious Crime Act 2015)
- Serious Violence Strategy 2018

4. Safeguarding Themes

4.1. Anti-Bullying

Watford Grammar School for Girls recognises the right of our children and young people to develop with confidence in an environment that is safe and free from the emotional and physical distress that can be seen as a result of bullying. It is the responsibility of Watford Grammar School for Girls to ensure that procedures are in place that will monitor and address bullying issues. The Anti-Bullying Policy is available on the school website.

4.2. Anti-Radicalisation and Extremism

The school works to provide an environment promoting tolerance and respect for others' views and beliefs and the values of democracy. The Prevent duty is implemented and staff are aware of the threats and risks linked to radicalisation. Behaviour or language suggesting extremism is challenged and addressed. Any concerns will be referred through the appropriate channels in accordance with the Child Protection policy.

4.3. Attendance

In accordance with the School's Attendance Policy, absences are rigorously pursued and recorded. The school, in partnership with the appropriate agencies, takes action to pursue and address all unauthorised absences in order to safeguard the welfare of children and young people in its care. We implement the statutory requirements in terms of monitoring and reporting children missing education (CME) and off-rolling and understand how important this practice is in safeguarding children and young people. For further details please refer to the Attendance Policy.

4.4. Child Protection

There is a detailed Child Protection Policy operating within the school. A copy will be provided to parents on request and is available on the school website. It is the Governing Body's duty to ensure the policy is reviewed annually and any deficiencies within the policy addressed immediately.

All Child Protection concerns will be managed in accordance with the Hertfordshire Safeguarding Children Partnership Inter-Agency Child Protection Procedures. A copy of these procedures can be found on the Hertfordshire Safeguarding Children Partnership website.

Children's Services telephone number **0300 1234043** (including out of hours)

4.5. Child Sexual Exploitation

Senior leadership and governors in the school are committed to dealing with the issue of Child Sexual Exploitation, and will co-operate fully with outside agencies including the police and health and social care to enable potential situations of Child Sexual Exploitation to be identified rapidly. Effective partnership working will also enable a swift response to follow, in line with Local Safeguarding Children Partnership procedures, so that clearly defined interventions can be put in place without delay. Interventions will include a robust multi-agency approach, based on an infrastructure of support around the young person and family. Support will be offered to the young person's peer group and their families, where appropriate.

The lead governor for CSE will be: **Camilla Woods**

The lead CSE teacher will be: **Chris Wilshaw** the Designated Safeguarding Lead.

The school, together with Hertfordshire Safeguarding Children Partnership (HSCP) is working to raise awareness of child sexual exploitation and help prevent it happening to young people in Hertfordshire. Concerns will be reported to: Children's Services (including out of hours) on 0300 123 4043 Herts Constabulary non-emergency [Tel:101](tel:101)

4.6. CSE Procedures

Procedures for what to do is a young person is identified as at risk of Child Sexual Exploitation are found in Appendix 1.

If there is a fear a child is in immediate danger, call 999

4.7. Peer-on-Peer Abuse

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours,

an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, 11 such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, 12 such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos¹³ (also known as sexting or youth produced sexual imagery);
 - upskirting,¹⁴ which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
 - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the school's policy and procedures with regard to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Incidents of sexual harassment and sexual violence between children will be managed using the advice in "Sexual violence and sexual harassment between children in school and colleges guidance" (2021):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

This advice is provided by the Department for Education. Its focus is on child-on-child sexual violence and sexual harassment at schools and colleges. The advice covers children of all ages, from primary through to secondary stage and into colleges and online. For the purposes of this advice, a child is anyone under the age of 18. Whilst the focus of the advice is on protecting and supporting children, schools and colleges should of course protect any adult students and engage with adult social care, support services and the police as required.

The advice sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred.

The advice highlights best practice and cross-references other advice, statutory guidance and the legal framework.

4.8. Complaints

The school has a Complaints Policy available to parents, pupils and staff who wish to report concerns. This can be found on the school website. All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific procedures for Managing Allegations Against Staff.

4.9. Confidentiality

All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the child and staff involved, but also to ensure that information being released into the public domain does not compromise evidence.

Safeguarding information will be stored and handled in line with the General Data Protection Regulation 2018. The DSL will normally obtain consent from the child/parent to share sensitive information with outside agencies. Where there is good reason to do so (e.g. to help to protect a child), the DSL may share information without consent and will record the reason for this. Safeguarding records are normally exempt from the disclosure provisions of the GDPR, which means that children and parents do not have an automatic right to see them. The School will retain this information on the pupil file and transfer to the next school/archive the information in line with The Education (Pupil Information) (England) Regulations 2005 and The Information and Records Management Society. The school will only share information about children with adults who have parental responsibility for a pupil. Please see Hertfordshire's Pupil Safeguarding Records Guidance at http://www.thegrid.org.uk/info/welfare/child_protection/proformas for further information.

4.10. Curriculum

Children are taught to understand and manage risk through PACE and Forum lessons and through all aspects of school life.

The school is committed to ensuring that children are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All children are taught that we have senior members of staff with responsibility for child protection and they are made aware of whom these persons are. We inform children of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.

Subjects such as Personal, Social and Health Education discuss relevant safeguarding issues with the children. Please see the Online Safety section of this policy for further details on this topic.

4.11. Female Genital Mutilation

If any persons employed or engaged to carry out teaching work, in the course of their work in school, discovers that an act of Female Genital Mutilation appears to have been carried out this will be reported to the police in line with statutory requirements. Further details can be found in the Child Protection Policy.

4.12. Forced Marriage

The school will ensure that teaching staff and key support staff are aware of how to act if they are concerned that a girl may be forced into a marriage, both whilst in the country or while abroad. Appendix 2 outlines the action to be taken by staff.

4.13. Health and Safety

We have a Health & Safety Policy which demonstrates the consideration we give to minimising any risk to children when on the school premises and when undertaking activities out of school under the supervision of our staff. At all times there must be appropriate staffing levels and when off-site,

appropriate and agreed pupil/adult ratios are maintained. The lead adult always assesses visits/trips as to the level of risk and all trips are finally authorised by the Educational Visits Coordinator or Headteacher.

Our school has lone working risk assessments in place and procedures for staff where there is a security risk due to the need to work alone; staff at high risk will receive appropriate training.

A copy of the Health and Safety Policy is available on the school website.

4.14. Inclusion and Diversity

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

Our school ethos promotes and accepts the differences between all children and adults. In practice this is about ensuring inclusion of individuals and treating them fairly and equally, no matter the diversity of their race, gender, age, disability, religion or sexual orientation.

Promoting equality and diversity in education is essential for both teachers and children. The aim is to create a classroom environment where all children can thrive together and understand that individual characteristics make people unique and not 'different' in a negative way.

In line with Keeping Children Safe in Education (DfE 2021), to ensure that all of our pupils receive equal protection, we will also give special consideration to additionally vulnerable groups (as outlined in our Child Protection Policy), for example children with disabilities or special educational needs. Special consideration is also given in the provision of safeguarding information and resources in accessible formats for children and adults with communication needs.

4.15. Online Safety

We have an E-safety policy which can be found on the school website.

Our policy includes how we teach children to stay safe when using the internet in and out of school- including the risks of sharing content and images online and tackling bullying, including cyber bullying. Cyber-bullying by children, via texts, emails and social media, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

The School will ensure that appropriate filtering methods are in place to ensure that children are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material.

The School has in place appropriate monitoring software that identifies potentially harmful content from the key-strokes on devices on the school network or accessed through the school wi-fi. This includes alerts to the school where content is above a threshold level as identified by the providing company. When alerted to issues of concern, the DSL Team will take such action to investigate and ensure the safety of pupils as is proportionate to the concern raised. This will take place on the day when the concern is raised wherever possible.

4.16. Digital images

The use of digital images in schools is a complex area. The school has a clear and sufficiently detailed policy which covers the taking and use of digital images and video of children and takes steps to ensure that it is understood and enforced.

Staff and children sign ICT Acceptable Use Agreements. For staff this includes a section on the use of digital images and clarification about the position regarding the use of personal mobile phones/cameras for taking pictures. Where volunteers are supporting school staff, they should abide by the same rules as school staff as far as is reasonable.

4.17. Managing Allegations made against and Concerns raised in relation to Staff, Supply Teachers, Contractors and Volunteers

Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at our school. We do recognise that sometimes the behaviour and actions of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. The Safer Recruitment Policy sets out this process. We will always ensure that the procedures outlined in Hertfordshire Safeguarding Children Partnership's Handbook and Part 4 of 'Keeping Children Safe in Education', DfE (2021) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). The Hertfordshire LADO Service can be contacted on **0300 123 4043**.

In line with Part 4 of Keeping Children Safe in Education 2021, allegations and concerns are categorised as either:

1. Allegations that may meet the harms threshold
2. Allegations/concerns that do not meet the harms threshold, also known as 'low level concerns'

Allegations that may meet the harms threshold are those where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors has:

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

Allegations/concerns that do not meet the harms threshold, also known as "low level concerns"

A 'low level' concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis or behind a closed door; or

- Using inappropriate sexualised, intimidating or offensive language

If any member of staff has a concern about staff, volunteer, supply teacher or contractor behaviour, either that may meet the allegations threshold or a low level concern, this must be reported to the Headteacher. The Headteacher will ensure that concerns are recorded and dealt with appropriately in line with KCSIE Part 4 (2021.)

The full procedure for dealing with allegations against staff are covered in the Child Protection Policy.

4.18. Partnership with Other Services

Our school recognises that it is essential to establish positive and effective working relationships with other agencies that are partners of the Hertfordshire Safeguarding Children Partnership. There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all children.

4.19. Partnership with Parents

Watford Grammar School for Girls is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

The school shares a purpose with parents to educate, keep children safe from harm and have their welfare promoted. We are committed to working with parents positively, openly and honestly. The School will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm. We encourage parents to discuss any concerns they may have with *Chris Wilshaw (Designated Safeguarding Lead; DSL)*, *Jo Shrimpton*, *Stephen Cowling* or *Bal Randhawa (Deputy Designated Safeguarding Leads; DSLs)*.

4.20. Safer Recruitment and Selection

Our recruitment process selects, screens, trains and supervises staff and volunteers so that unsuitable people can be deterred and rejected from working with children.

A copy of the School's Safer Recruitment Policy is available on the school website.

The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the Local Authority Designated Officer (LADO) and/or HR.

Our school also adheres to the guidance issued by The Department for Education in 2015 regarding persons who are disqualified under the Childcare Act 2006.

4.21. Safer Working Practice

All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

The Teachers' Standards (DfE,2012) are augmented by standards of personal and professional conduct e.g. ethics and behaviour, in and out of school. Teachers are expected to 'uphold public trust in the profession by showing tolerance and respect for the rights of others, not undermining fundamental British values and ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability'.

All staff will be provided with a copy of our school's staff code of conduct and handbook at induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

The link below will direct you to the current government approved guidance on safer working practice which we share with staff: <http://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>

4.22. Abuse of Position Of Trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person aged 18 or over intentionally to behave in certain sexual ways in relation to a child aged under 18, where the adult is in a position of trust in respect of the child, even if the behavior is consensual.

4.23. Site Security

The security measures put into place at Watford Girls balance the need to remain a welcoming environment whilst ensuring the safety of all our children and staff. A security risk assessment will be completed and reviewed annually (or earlier if deemed necessary).

4.24. Access to buildings

The school will take all reasonable efforts to control access to the buildings and grounds of the school to prevent unauthorised access to children and ensure the personal safety of staff. The access control procedures for the buildings are: Pin code access to all external gates and doors.

4.25. Visitors, contractors and maintenance personnel

The control of visitors, contractors and maintenance personnel is a fundamental part of our site security policy for the safeguarding of both people and property.

Where the Governing Body transfers control or otherwise allows the use of school premises to external bodies (such as sports clubs) or service providers during or out of school hours, we will ensure that these bodies or providers have appropriate safeguarding policies and procedures, and that there are arrangements in place to co-ordinate with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the bodies or providers.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school. Visitors will be expected to sign in and out via the office Inventory system and to display a visitors badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

4.26. Whistle blowing

All staff and volunteers are made to feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding arrangements. Appropriate whistleblowing procedures are in place to enable concerns to be raised with the school's senior leadership team.

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- Children's Services 0300 123 4043
- NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Appendix 1: What To Do If A Young Person Is Identified As At-Risk Of Child Sexual Exploitation

Upon a concern about CSE being raised in relation to a child or young person by a staff member in school or a member of the public, DSLs will need to complete the following actions as soon as possible and within 2 hours:

- Speak with the child/young person if appropriate
- Complete the SEARCH Indicators of Child Sexual Exploitation, which can be found at: https://hertsscb.proceduresonline.com/pdfs/search_indicators_cse.pdf.
- Contact the Hertfordshire Child Protection Consultation Hub on 01438 737511.
- If a young person discloses and there is evidence to suggest that a crime has been or may have been committed against them, contact the police and report the crime noting the incident number for future reference.
- Send in a child protection contact referral to Children's Services following the procedures in the Thresholds and Pathways document. Attach the completed CSE Toolkit as supporting evidence to the referral form itself and submit them electronically.

If a child or young person goes missing at any point during this process, the MASH and the Police must be contacted immediately:

- In an emergency call 999
- Children's Services (including out of hours) on 0300 123 4043
- Herts Constabulary non-emergency [Tel:101](tel:101)

Appendix 2: Steps to take in the Event of a disclosure of Forced Marriage

This guidance is taken from the Multi-agency practice guidelines: Handling cases of Forced Marriage document which is in the Safeguarding Folder on the Staff Area.

Please note that staff are not expected to question students or investigate and should pass any concerns regarding forced marriage to the DSL team via CPOMS. If a member of staff believes that forced marriage will take place imminently, they should alert a member of the DSL team immediately in person to ensure that rapid action can be taken. Whilst staff are not expected to investigate, the guidance below may be useful for any teacher to whom a student makes a disclosure relating to forced marriage.

7.2 WHAT TO DO WHEN YOU ARE CONCERNED THAT A STUDENT MAY BE FORCED TO MARRY

Staff may be concerned about a student because they are exhibiting some of the behaviour shown in the chart of potential warning signs and indicators (sections 2.7 & 2.9). Alternatively, a student may approach a member of staff because they are going on a family holiday overseas and they are concerned about this. They are often told that the purpose is to visit relatives, attend a wedding or because of the illness of a grandparent or close relative. The student may suspect that this is a ploy and that there is an ulterior motive, which is to force them to marry.

Do not assume that a student is at risk of being forced into marriage simply on the basis that they are being taken on an extended family holiday. These assumptions and stereotyping can cause considerable distress to families. All efforts should be made to establish the full facts from the student at the earliest opportunity.

Once the full facts have been established, the member of staff should be able to decide on the level of response required. This may be to offer the student advice or to provide them with information about specialist advice and information services. However, there may be occasions when the level of concern is such that it becomes a child protection issue; in these cases, the appropriate child protection procedures will need to be followed.

7.3 WHAT TO DO WHEN A STUDENT SEEKS HELP

- ✓ Follow the first steps set out in section 4.1
- ✓ If appropriate follow the additional steps set out in section 4.2
- ✓ Collect as much of the information required in section 5.1 as possible
- ✓ Explain all the options to the student (section 3.5), recognise and respect their wishes. If the student does not want any referral to be made, e.g. to social services, the teacher, lecturer or other member of staff will need to consider whether the student's wishes should be respected or whether the student's safety requires that further action be taken. If you do take action against the student's wishes, you must inform them
- ✓ Liaise with the designated teacher with responsibility for safeguarding children and seek advice from the Forced Marriage Unit (section 2.13)
- ✓ Liaise with the local police and social services to establish if any incidents concerning the family have been reported (e.g. missing persons or domestic violence etc.)
- ✓ If you have concerns for the safety of a student under 18 years old, activate local safeguarding procedures and use existing national and local protocols for multi-agency liaison with police and children's social care
- ✓ Refer to the local police child protection unit or domestic abuse unit if there is any suspicion that a crime has been, or may be, committed. Liaise with then police if there are concerns about the safety of the student or the student's siblings

- ✓ Refer the student, with their consent, to appropriate local and national support groups and counselling services with a history of dealing with cases of forced marriage (page 100). If in doubt, consider seeking advice from the Forced Marriage Unit (section 2.13)
- ✓ Consider whether a communication specialist is needed if the student is deaf, visually impaired or has learning disabilities

There are legal remedies that social services can take to prevent young people being taken overseas. These include making the student a ward of court or surrendering their passport or passports (if they are a dual national see section 2.11). Full details of these remedies are set out on section 3.15.

7.4 WHAT TO DO WHEN A STUDENT IS GOING OVERSEAS IMMEDIATELY

Try to gather as much information as possible, as there may not be another opportunity if the student goes overseas. This information may help the Forced Marriage Unit to locate the student and assist to repatriate them.

- ✓ Follow the first steps set out in section 4.1
- ✓ If appropriate follow the additional steps set out in section 4.2
- ✓ Collect as much as possible of the information set out in section 5.1
- ✓ If they are a British national, give the student the contact details of the nearest British Embassy or High Commission (page 97)
- ✓ If they are not a British national, advise them to contact the Forced Marriage Unit (section 2.13). The Unit may be able to provide details of reliable NGOs overseas and the details of the relevant embassy
- ✓ Explain the difficulties that the student may face when overseas (section 2.10)
- ✓ Explain the options available to the student (section 3.5)

7.5 WHAT TO DO WHEN YOU SUSPECT THAT A STUDENT MAY BE FORCED TO MARRY

- ✓ Speak to the student about your concerns
- ✓ Follow the first steps set out in section 4.1
- ✓ If appropriate follow the additional steps set out in section 4.2
- ✓ Collect as much of the information required in section 5.1 as possible
- ✓ Refer to warning signs (sections 2.7 & 2.9)
- ✓ Liaise with the DSL Team as appropriate and report on CPOMS
- ✓ Establish if there is a family history of forced marriage, i.e. siblings forced to marry. Other indicators may include domestic violence, self-harm, family disputes, unreasonable restrictions (e.g. withdrawal from education or “house arrest”) or missing persons within the family
- ✓ Liaise with the local police and adult or children’s social care to establish if any incidents concerning the family have been reported (e.g. missing persons or domestic violence etc.)
- ✓ If you have concerns for the safety of a student under 18 years old, activate local child safeguarding procedures and use existing national and local protocols for multi-agency liaison with police and children’s social care
- ✓ Establish if the student has dual nationality as they may have two passports (section 2.11).
- ✓ Seek advice from the Forced Marriage Unit (section 2.13)

What you should not do:

- ✗ Treat such allegations merely as a domestic issue and send the student back to the family home
- ✗ Ignore what the student has told you or dismiss out of hand the need for immediate protection
- ✗ Decide that it is not your responsibility to follow-up the allegation
- ✗ Approach the student’s family or those with influence within the community, without the express consent of the student, as this will alert them to your concerns and may place the student in danger
- ✗ Contact the family in advance of any enquiries by the police, the Forced Marriage Unit, adult or children’s social care, either by telephone or letter

- ✘ Share information outside information sharing protocols without the express consent of the student
- ✘ Attempt to be a mediator (section 3.10).

7.6 WHAT TO DO WHEN A STUDENT STOPS ATTENDING SCHOOL

Local authorities in England have a duty to identify all children not receiving a suitable education. This relates to children of compulsory school age who are not on a school roll and who are not receiving a suitable education otherwise than being at school (this could involve, for example, home education, private education, alternative provision). Details of the steps local authorities need to take to meet this duty are described in “Statutory Guidance for local authorities in England to identify children not receiving a suitable education”.

There may be occasions when a student does not return to education after a holiday or they may stop attending school during term time. In these situations, staff may have a suspicion that forced marriage is an issue.

- ✓ If a teacher, lecturer or other member of staff suspects that a student has been removed from, or prevented from, attending education as a result of forced marriage, a referral should be made to the local authority adult or children’s social care and the police
- ✓ Liaise with the local police domestic abuse unit
- ✓ Contact the Forced Marriage Unit (section 2.13)
- ✓ Try to obtain as much information about the student as possible (section 5.1)
- ✓ Establish if there is a history of siblings being forced to marry
- ✓ Consider speaking to the student’s friends

Remember:

There may be occasions when an Local Authority Attendance Officer or member of school staff visits the family in the UK to find out why the student is not attending school or college. The family may tell the teacher that the student is being educated overseas. Sometimes, the family may suggest that the teacher speaks to the student on the telephone. If this occurs, the teacher should refuse to speak on the telephone and (if the student is a British national) insist that the student is presented at the nearest British Embassy or High Commission. There have been occasions when students have not been able to talk freely over the telephone or a different individual has spoken to the teacher.

For further information, refer to the statutory guidance for local authorities in England to identify children not receiving a suitable education.

What staff should not do:

- ✘ Remove the student from the register without first making enquiries and referring the case to police and local authority adult or children’s social care
- ✘ Dismiss the student as taking unauthorised absence

7.7 MAKING REFERRALS

It is not the role of teachers and staff to investigate allegations of abuse of a student and therefore, if the student is under 18 years, all referrals should be made in accordance with Working Together To Safeguard Children. These referrals will usually be to children’s social care or the police. The Forced Marriage Unit can also be contacted for advice and help in making the referral.

If the student is an adult with disabilities, referrals should be made in accordance with the local Multiagency Adult Protection Committee procedures and protocols to protect vulnerable adults from abuse (chapter 10).

Remember:

The student may not wish to be referred to a social worker, police officer or a guidance/pastoral/head teacher from his or her own community.

Consult other professionals, particularly an experienced manager/colleague, the local police child protection or domestic abuse unit. Advice can be sought without revealing the student's identity.

Speaking to the student's parents about the action you are taking may place the student at risk of harm. Therefore, do not approach the family as they may deny that the student is being forced to marry, move the student, expedite any travel arrangements and bring forward the forced marriage.

Report details of the case, with full family history, to the Forced Marriage Unit (section 2.13). Encourage the student to get in touch with the Forced Marriage Unit. The Unit gives confidential advice to individuals who fear they may be forced to marry.

4.1 FIRST STEPS IN ALL CASES

- ✓ See them immediately in a secure and private place where the conversation cannot be overheard
- ✓ See them on their own – even if they attend with others
- ✓ Explain all the options to them (section 3.5)
- ✓ Recognise and respect their wishes
- ✓ Perform a risk assessment
- ✓ Contact, as soon as possible, a trained specialist who has responsibility for forced marriage
- ✓ If the young person is under 18 years of age, refer them to the Designated Safeguarding Lead and activate local safeguarding procedures
- ✓ Reassure them about confidentiality i.e. practitioners will not inform their family
- ✓ Establish a way of contacting them discreetly in the future (section 3.6)
- ✓ Obtain full details to pass on to the trained specialist
- ✓ Consider the need for immediate protection and placement away from the family.

DO NOT:

- ✓ Send them away
- ✓ Approach members of their family or the community unless they expressly ask you to do so
- ✓ Share information with anyone without their express consent (section 3.3 & 3.7)
- ✓ Breach confidentiality (except as set out in section 3.7)
- ✓ Attempt to be a mediator (section 3.10).

4.2 ADDITIONAL STEPS

- ✓ Give them, where possible, the choice of the ethnicity and gender of the specialist who deals with their case
- ✓ Inform them of their right to seek legal advice and representation
- ✓ If necessary, record any injuries and arrange a medical examination (section 3.8)
- ✓ Give them personal safety advice (section 3.11)
- ✓ Develop a safety plan in case they are seen i.e. prepare another reason why you are meeting
- ✓ Establish if there is a family history of forced marriage, e.g. siblings forced to marry. Other indicators may include domestic violence, self-harm, family disputes, unreasonable restrictions (e.g. withdrawal from education or “house arrest”) or missing persons within the family
- ✓ Advise them not to travel overseas. Discuss the difficulties they may face (section 2.10)
- ✓ Identify any potential criminal offences and refer to the police if appropriate

- ✓ Give them advice on what service or support they should expect and from whom
- ✓ Ensure that they have the contact details for the trained specialist
- ✓ Maintain a full record of the decisions made and the reason for those decisions
- ✓ Information from case files and database files should be kept strictly confidential and preferably be restricted to named members of staff only
- ✓ Refer them, with their consent, to appropriate local and national support groups, counselling services and women's groups that have a history of working with survivors of domestic abuse and forced marriage (page 100).

Remember:

When referring a case of forced marriage to other organisations, ensure they are capable of handling the case appropriately. If in doubt, approach established women's groups who have a history of working with survivors of domestic abuse and forced marriage and ask these groups to refer the person to reputable agencies.

Circumstances may be more complex if the person is lesbian, gay, bisexual or transgender. Refer to appropriate support groups (page 100). British Embassies and High Commissions can only help British nationals or, in certain circumstances Commonwealth nationals. This means that if a non-British national leaves the UK to be forced into marriage overseas, the British Embassy or High Commission will not be able to assist them.

If in doubt, ask the Forced Marriage Unit for advice.

5.1 INFORMATION REQUIRED FOR ALL CASES

Ideally, the information should be gathered by a police or social care trained specialist. However there may be occasions when a person is going overseas imminently and as it is an emergency, an education or health professional may need to gather as much information as possible from the victim. In these cases, the information should be passed on to police, social care services and the Forced Marriage Unit. All information should be stored in accordance with safeguarding children and adult protection policies and procedures.

All practitioners working with victims of forced marriage and honour-based violence need to be aware of the "one chance" rule. That is, they may only have one chance to speak to a potential victim and thus they may only have one chance to save a life. This means that all practitioners working within statutory agencies need to be aware of their responsibilities and obligations when they come across forced marriage cases. If the victim is allowed to walk out of the door without support being offered, that one chance might be wasted.

The case may be reported by a third party or by the person under threat - whoever reports the case, you should:

- ✓ Obtain details of the person making the report, their contact details, and their relationship with the individual under threat
- ✓ Obtain details of the person under threat including:
 - Date of report
 - Name of person under threat
 - Nationality
 - Age
 - Date and place of birth
 - Passport details
 - School details
 - Employment details
 - Full details of the allegation

- Name and address of parents or those with parental responsibility
 - National Insurance number
 - Driving licence number
- ✓ Obtain a list from the person under threat of all those friends and family who can be trusted and their contact details
 - ✓ Establish a code word to ensure you are speaking to the right person (section 3.6)
 - ✓ Establish a way of contacting them discreetly in the future that will not put them at risk of harm (section 3.6)
 - ✓ Obtain any background information including schools attended, involvement by adult or children's social care, doctors or other health services etc.
 - ✓ Record details about any threats, abuse or other hostile action against the person, whether reported by the victim or a third party
 - ✓ Obtain a recent photograph and any other identifying documents. Document any other distinguishing features such as birthmarks and tattoos etc.
 - ✓ Establish the nature and level of risk to the safety of the person (e.g. is she pregnant? Do they have a secret boyfriend or girlfriend? Are they already secretly married?)
 - ✓ Establish if there are any other family members at risk of forced marriage or if there is a family history of forced marriage and abuse.

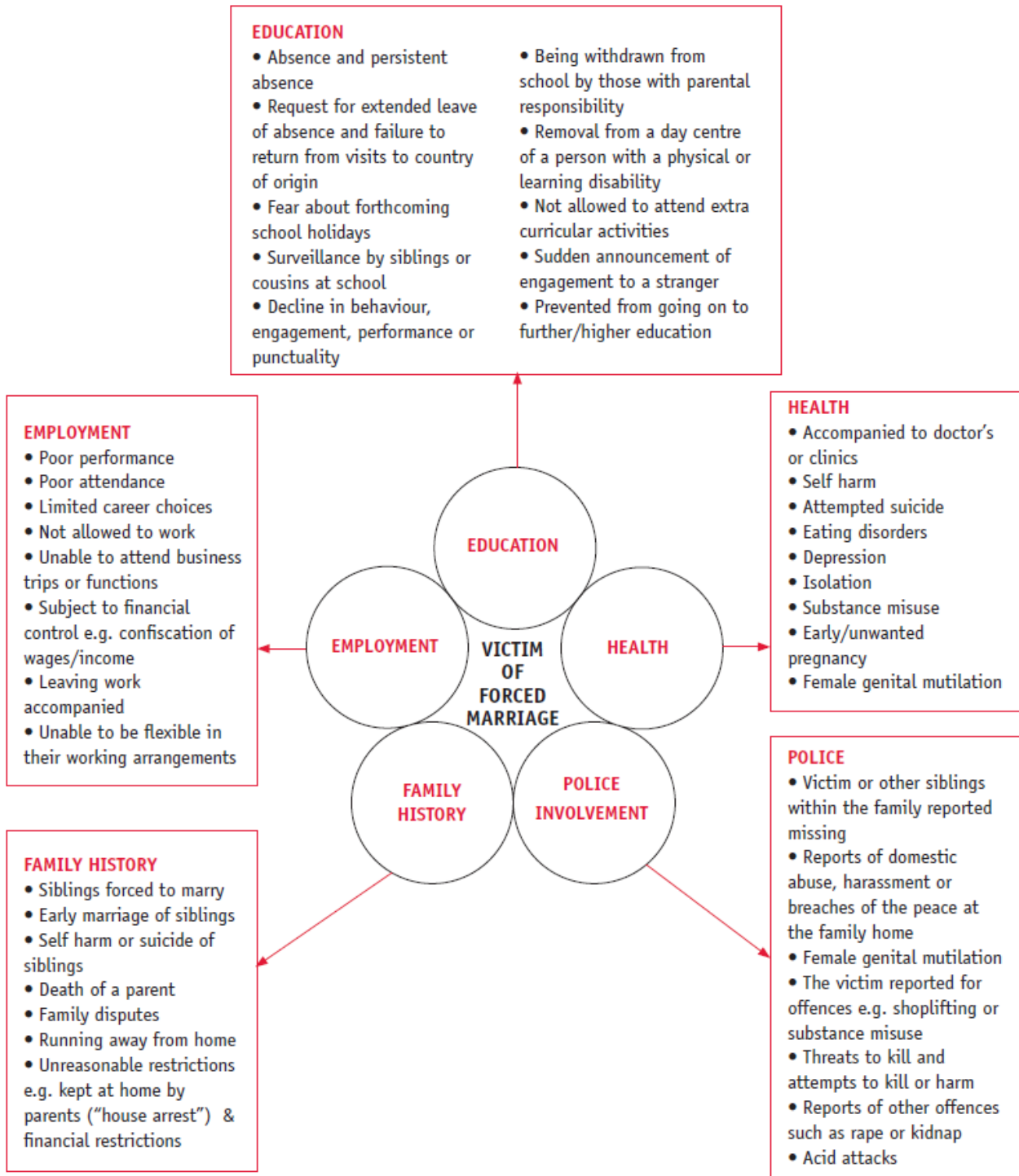
2.7 POTENTIAL WARNING SIGNS OR INDICATORS

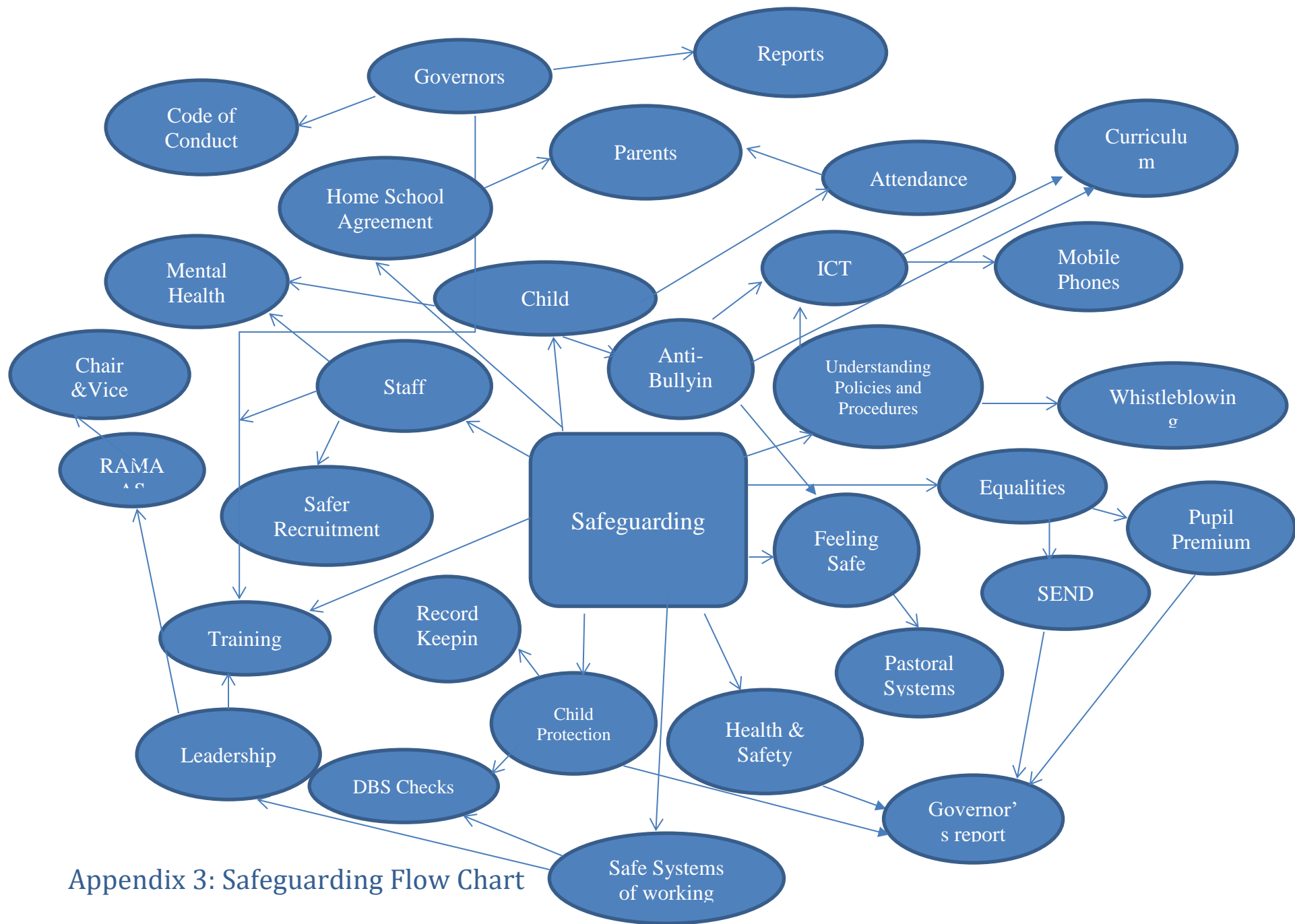
Both men and women facing forced marriage may become anxious, depressed and emotionally withdrawn with low self-esteem. They may come to the attention of practitioners for a variety of reasons, some of which are described in the diagram opposite. Whilst the factors set out in this diagram may be an indication that someone is facing a forced marriage, it should not be assumed that it is forced marriage simply on the basis that someone presents with one or more of these warning signs. These warning signs may indicate other types of abuse that will also require a multiagency response.

There have been occasions when women have presented with less common warning signs, such as cut or shaved hair as a form of punishment for disobeying or, perhaps, "dishonouring" her family. In some cases, a girl may report that she has been taken to the doctor's, to be examined to see if she is a virgin. There have been reports of women presenting with symptoms associated with poisoning. In certain communities, it is important that women undergo female genital mutilation (FGM) before being able to marry – usually this will be performed during childhood but there have been reports of young girls or young women undergoing FGM just before a forced marriage. FGM has been illegal in the UK since 1985 and it is also a criminal offence to take someone overseas for the purposes of FGM.

2.9 CHART (OPPOSITE PAGE) OF POTENTIAL WARNING SIGNS OR INDICATORS

These indicators are not intended to be exhaustive.





Appendix 3: Safeguarding Flow Chart