



## **P2.2 (ISI 7A) – SAFEGUARDING AND CHILD PROTECTION POLICY**

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## Revision History

Revision	Paragraph Number	Revision
October 2017		
September 2018		Updated
April 2019		Updated
September 2019		Updated
April 2020		Updated
September 2020	Abbreviations, Acronyms and Definitions	ACE and Staff added. Definition of 'Upskirting' updated.
	Statement of Intent	Definition of safeguarding added. Update to policy documents referred to
	Paragraph 8	New
	Paragraph 9	3 <sup>rd</sup> bullet point added; 6 <sup>th</sup> bullet point updated to add NPCC link; 17 <sup>th</sup> bullet point updated to add reference to KCSIE recommendations for online learning
	Paragraph 10	Change to grammar tenses to reflect additional DDSL
	Paragraph 18	Delete reference to Code of Conduct for Instrumental Teachers (now absorbed into new P2.3 Code of Conduct for Staff)
	Paragraph 35-38	Updated explanation of CSE and CCE
	Paragraph 39	New
	Paragraph 40	Replace phrase "domestic violence" with "domestic abuse"
	Paragraph 50	Add first sentence
	Paragraph 51 & 52	New
	Paragraph 53	Replace phrase "honour-based violence" with "honour-based abuse"

Paragraph 66	First sentence added
Paragraph 67	Paragraph expanded
Paragraph 69	List of relevant policies and titles updated
Paragraph 74	Replace “designated officer” with “relevant authorities”
Paragraph 83	Rephrased
Paragraph 87	Rewritten
Paragraph 89	Minor rephrasing to provide additional clarity
Paragraph 91	Final 4 words added
Paragraph 108	Update to titles of relevant policies
Paragraph 111	Paragraph expanded to clarify data protection principles

## Abbreviations, Acronyms and Definitions

Abbreviation / Acronym	Definition
ACE	Adverse Childhood Experience is the term used to describe traumatic experiences before the age of 18 that can lead to negative lifelong emotional and physical outcomes. Examples of these include any form of abuse, witnessing domestic abuse, substance abuse, co-existing mental illness etc.
C-SPA	Surrey Children’s Single Point of Access
DDSL	Deputy Designated Safeguarding Lead
DfE	Department for Education
DSL	Designated Safeguarding Lead
FGM	Female Genital Mutilation
KCSIE	<i>Keeping Children Safe In Education</i>
LADO	Local Authority Designated Officer
MASH	Multi-Agency Safeguarding Hub
NCTL	National Council for Teaching and Leadership (Now replaced by the TRA)

Staff	References to staff include full-time and part-time, employed, self-employed, supply and voluntary personnel.
TRA (Replaced NCTL)	Teaching Regulation Agency
Upskirting	Typically involves taking a picture under a person's clothing without them knowing and/or without consent, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence under the Voyeurism (Offences) Act which came into force on 12 <sup>th</sup> April 2019.

## Statement of Intent

The Yehudi Menuhin School is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Protecting children from maltreatment;
- 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; and
- Taking action to enable all children to have the best outcomes.

This policy complies with guidance issued by Surrey Safeguarding Children Board (SSCB) and has regard to the following publications:

- *Keeping Children Safe in Education* (September 2020)
- *Disqualification under the Childcare Act 2006* (September 2018)
- *What to do if you’re worried a child is being abused* (March 2015)
- *Working Together to Safeguard Children* (September 2018)
- *Prevent Duty Guidance: for England and Wales* (July 2015)
- *The Prevent duty : Departmental advice for schools and childminders* (June 2015)
- *The use of social media for on-line radicalisation* (July 2015)
- *Sexting in schools and colleges : responding to incidents and safeguarding young people* (UKCCIS, August 2016)
- *Child sexual exploitation : definition and guide for practitioners* (DfE February 2017)
- *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges* (December 2017)
- *The use of social media for on-line radicalisation* (July 2015)
- *Multi-agency statutory guidance on female genital mutilation* (July 2020)
- *Data Protection Act (2018)*

This policy is available to both parents and staff on the Yehudi Menuhin School website in accordance with Independent School Inspectorate regulations. Printed copies of the policy are available to parents on request from the School Reception. It is updated annually and whenever there is a change in the relevant legislation.

It should be noted that references to “child / children / young people” are considered to cover all pupils of the school, which includes young adults up to the age of 20.

## Introduction

1. The Governors of the School recognise their responsibility under section 175 of the Education Act (2002), sections 7 and 8 of The Education (Independent School Standards) (England) Regulations 2010, as amended by The Education (Independent School

Standards)(England)(Amendment) Regulations 2012, and standard 11 of the National Minimum Standards for Boarding Schools (2015) to safeguard and promote the welfare of pupils at the School, and to work together with other agencies to ensure adequate arrangements within the School to identify, assess, and support those children who are suffering harm.

2. The School is committed to acting in the best interests of every child and recognises that safeguarding and promoting the welfare of children is the responsibility of everyone. It is the responsibility of all staff, volunteers and governors to consider at all times what is in the best interests of the child.
3. The School believes that it should provide a caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child.

## **Aims**

4. The aims of this policy are:
  - To support the child's development in ways which will foster security, confidence and independence.
  - To provide an environment in which children and young people feel safe from harm, secure, valued, respected and confident and in which they know how to approach adults if they are in difficulties, knowing they will be listened to effectively.
  - To raise awareness of all teaching and non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
  - To create an environment where staff feel confident about raising concerns and feel supported in their safeguarding role.
  - To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the School, contribute to assessments of need and support planning for those children.
  - To emphasise the need for good levels of communication between all members of staff with regard to safeguarding.
  - To develop a structured procedure within the School to be followed by all members of the school community in cases of suspected abuse.
  - To develop and promote effective working relationships with other agencies; especially the Police and Surrey Children's Services.

- To operate safe recruitment procedures to ensure that all adults within our School, both staff and volunteers, who are involved in “regulated activity” with children have been checked as to their suitability.

## Key School Personnel

5. The **Designated Safeguarding Lead** (DSL) with responsibility for child protection matters is Mrs Joanne Field, the resident Senior School Nurse/Houseparent and Head of Pastoral Care.
6. In the absence of the Designated Safeguarding Lead, Mr David Bruce, the Director of Academic Studies and DDSL, or Ms Angela Williams, Houseparent and DDSL, will act as her deputy.
7. Mrs Alice Phillips (Chair of Education and Pastoral Care Committee) and Mr Geoffrey Richards (Vice Chairman of Governors and Chairman of the Risk Committee) are the Governors who have lead responsibility for safeguarding arrangements in the School. However, safeguarding duties remain the responsibility of the Board of Governors as a whole.
8. In the event of the need for a serious case review, the Governing Body and the Senior Leadership Team, especially the DSL, should be aware of local arrangements with the three safeguarding partners (local authority, clinical commissioning group and the Police).

## Roles and responsibilities

9. We have ensured that the **Designated Safeguarding Lead**:
  - Is appropriately trained according to Annex B of *Keeping Children Safe in Education* (inter-agency working, participation in child protection case conferences, supporting children in need, Prevent awareness, and promoting a culture of listening to children). This includes formal safeguarding training which is updated at least every two years, as well as updating knowledge and skills via other CPD routes such as e-bulletins, attending SSCB and MDS Safeguarding conferences etc.
  - Acts as a source of support and expertise to the school community.
  - Is accountable for the system of referral for safeguarding concerns and whether or how these concerns are escalated.
  - Has an understanding of C-SPA procedures.
  - Keeps written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child’s

general file, with a mark on the general file to indicate the existence of the additional file.

- Refers cases of suspected neglect and/or abuse to children’s social care or the police in accordance with this guidance and the NPCC “When to Call the Police” Guidance <https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>.
- Attends and/or contributes to child protection conferences in accordance with local procedure and guidance.
- Is a member of the School’s Leadership Team.
- Co-ordinates the School’s contribution to child protection plans.
- Develops effective links with relevant statutory and voluntary agencies.
- Ascertains that all staff sign to indicate that they have read and understood this policy and Part 1 of KCSIE; ensures Annex A is read and understood by School leaders and those who work directly with children.
- Reviews the P2.2 Safeguarding and Child Protection policy at least annually and has it updated if necessary.
- Liaises with the Head as appropriate.
- Organises child protection induction for new staff.
- Organises comprehensive training at least every three years for every member of staff including ensuring that all staff are trained to manage a report of child on child sexual violence and sexual harassment.
- Provides updates on specific and site relevant safeguarding matters at least three times a year at staff meetings (and by email) or whenever there are any changes in the relevant legislation. In addition, further email updates are also sent each half-term.
- Provides advice and support to the school regarding online safety, ensures that the School’s e-learning policies are updated to follow KCSIE recommendations, and makes staff aware of said policies.
- Keeps a record of staff attendance at safeguarding training and ensures that this is correctly recorded in the Staff Training Register.

- Provides, with the Head, an annual report for the governing body detailing any changes to the policy, any training undertaken by staff, the number and type of incidents and the number of children (anonymised) with child protection plans.
- Makes this policy available on the School website.

10. We have ensured that the Deputy Designated Safeguarding Leads:

- Are appropriately trained according to Annex B of *Keeping Children Safe in Education* (inter-agency working, participation in child protection case conferences, supporting children in need and promoting a culture of listening to children). This includes formal safeguarding training which is updated at least every two years, as well as updating knowledge and skills via other CPD routes such as e-bulletins etc.
- Have an understanding of C-SPA procedures.
- See to it that the safeguarding and child protection policy and procedures are implemented and followed by all staff.
- Assess pupils and attend strategy discussions and other necessary meetings, so that the DSL can carry out her role. Hold fortnightly meeting with DSL to discuss ongoing concerns.
- Are confident that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's whistleblowing procedures.
- See that child safety and welfare are addressed through the curriculum.

## Procedures

11. All members of the governing body and staff (full-time, part-time and volunteers) understand and fulfil their responsibilities; the governing body undertakes an annual review of the safeguarding and child protection policy and procedures and discharges the relevant duties.
12. The Chair of the Education Committee and Governor responsible for overseeing Health and Welfare meet with the DSL and Head twice yearly to monitor in general terms any referrals, concerns or complaints, the efficiency with which the School's duties have been discharged and the contribution of the School to inter-agency working, and report back on their findings to subsequent Full Council Meetings.

13. The Vice Chair of Governors meets with the Head and HR Officer or Compliance Officer to review sample personnel files and the Single Central Register on a termly basis.
14. Any identified deficiencies and weaknesses are remedied without delay; in particular, if a substantiated allegation has been made against a member of staff, the School will work with designated officers from SSCB Support Team to determine whether there are any improvements to be made to its procedures or practices to prevent similar events occurring in the future.
15. We have a DSL, Mrs Joanne Field, who is a member of the School's Leadership Team; her role is to keep full and detailed records, coordinate concerns, act as the main referral point for the investigating agencies of social care and the police, and act as trainer and adviser in School.
16. We have two Deputy Safeguarding Leads, the Director of Academic Studies - Mr David Bruce, and Houseparent – Ms Angela Williams.
17. The DSL and the DDSL have undertaken the three foundation modules provided by SSCB (or their equivalent) and update their DSL training every 2 years. (DDSL is due to undertake Module 3 "DSL New to Role" training in Autumn 2019).
18. All members of staff and volunteers (both permanent and temporary) receive induction training in KCSIE. All staff receive information and guidance on the following policies from the DSL:
  - Policies :
    - Safeguarding and Child Protection
    - Staff Code of Conduct
    - Whistleblowing (as part of Safeguarding & Child Protection Policy)
    - Behaviour Management Policy
    - IT Acceptable Use
    - E-Safety for Staff
    - Procedure if a Pupil goes missing
  - All staff receive Part 1 and Annex A of *Keeping Children Safe In Education* and Part 5 where appropriate.
  - Completing training in the Prevent Duty and On-line safety (where relevant) and are directed within the first three months of employment to additional training as detailed in the School's Training Matrix.
19. We require evidence that all agency or contracted staff have received safeguarding and child protection training as applicable to their role.

20. Appropriate child protection checks and procedures are followed in accordance with our P4 Recruitment Policy for any staff employed by another organisation.
21. Chair of Governors, the members of SLT and those directly responsible for the recruitment of staff complete Safer Recruitment Training.
22. All pupils are taught about abuse in all its forms, how to recognise abuse, how to protect themselves from abuse and how to get help if they are worried about abuse.
23. All parents/carers, both current and prospective, are made aware of the responsibilities of staff members with regard to safeguarding procedures through publication of the School's Safeguarding and Child Protection Policy on the School website. A printed copy of the Policy is available to parents on request from the School Reception.
24. Child protection concerns or allegations against adults working in the School are discussed by the Head within one working day with the designated officer at Surrey Children's Services and any member of staff found to be unsuitable to work with children is notified to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA); in addition, any 'serious incident' (i.e. an incident which the designated officer deems in need of investigation) will be reported to the Charity Commission.

## **Applicability**

25. This policy applies to everyone at The Yehudi Menuhin School.

## **Categories and Indicators of Child Abuse**

26. Abuse and neglect are forms of maltreatment caused either by inflicting harm or by failing to protect from harm. 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. They may be abused by an adult or adults or by another child or children. Child abuse can take many forms, but it is usually divided into four categories; physical abuse, sexual abuse, emotional abuse and neglect. However, abuse and neglect are rarely stand-alone events. In most cases there will be several overlapping issues. All four forms of abuse can have both physical and behavioural indicators. If there are concerns about a child displaying any of these indicators, the concern must be shared with the DSL.

## Types of Abuse

### Physical Abuse

27. Physical abuse is deliberately physically hurting a child and can include 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. The harm caused by physical abuse can range from minor injuries to major trauma.

28. Indicators of physical abuse can include:

- Frequent injuries
- Unexplained injuries such as cuts, bruises, burns or scalds, bite marks
- Fabricated or induced illness
- Female genital mutilation (FGM)

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Further details can be found in KCSIE.

29. The experience of being harmed may also cause mental health and behavioural problems in a child, such as:

- Depression and anxiety
- Aggression and violence
- Problems with relationships and socialising
- Trying to hide injuries under clothing
- Running away from home
- Being distant and withdrawn

### Sexual Abuse

30. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 in education. (See “Peer on Peer Abuse” Paragraphs 22-27)

31. The definition of child sexual exploitation (CSE) and child criminal exploitation (CCE) is as follows:

*CSE and CCE are forms of child abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. The victim may have been exploited even if the activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.*

### Emotional Abuse

32. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children to frequently feel frightened or in danger, or in 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.

### Neglect

33. Neglect is failure to provide for 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 also occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. Neglect can have a debilitating and long-lasting effect on a child’s physical wellbeing, and on their mental, emotional and behavioural development.

34. Indicators of or signs of neglect include:

- Dirty or unsafe living accommodation

- Hunger
- Aggression
- Poor health
- Dirty and/or ill-fitting clothes
- Poor school attendance

## Other Safeguarding and Child Protection concerns

### Mental Health

35. All staff should be aware that mental health problems can be in some cases that a child has suffered, or is at risk of, some form of abuse.
36. Only appropriately trained professionals should attempt to diagnose mental health problems. However, staff are well placed to identify behaviour that may suggest a pupil is experiencing or is at risk of developing a mental health problem.
37. Should a member of staff have any concerns in this regard, they should only discuss this with the School Nurse or with the DSL and take advice from them on how to proceed.
38. Traumatic adverse childhood experiences (ACEs) can have a lasting impact throughout childhood into adulthood. Staff should be aware how ACEs can impact on children's mental health, behaviour and education.

### Peer-on-Peer / Child-on-child Abuse

39. In order to minimise the risk of peer-on-peer abuse, the School educates pupils in this topic in its PSHCE curriculum and general pastoral teaching. In addition, the high staff : pupil ratio supports a high degree of supervision through-out the waking day and minimises the opportunity for peer-on-peer abuse to occur.
40. Peer-on-Peer abuse is any form of physical, sexual, emotional or financial abuse, or coercive control exercised between children and within children's relationships. Peer-on-peer abuse can take various forms, including: serious bullying (including cyber-bullying), physical abuse such as hitting, shaking, biting, hair pulling etc., relationship abuse, domestic abuse, criminal exploitation, serious violence, harmful sexual behaviour including sexual violence and sexual harassment between children in schools, initiation/hazing type rituals, upskirting and/or gender-based violence. **Regardless of the form, abuse is taken extremely seriously by the School.**
41. Staff should be aware that other safeguarding issues may manifest themselves via peer-on-peer abuse. Therefore a safeguarding approach should be taken by staff to all children

involved in allegations of, or concerns about, peer-on peer abuse, including those who have allegedly experienced abuse, and those who have allegedly been responsible for it. Research has shown that many children who present with harmful behaviour towards others, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers.

42. Staff should be alert to signs of peer-on-peer abuse which may include changes in friendship groups, out-of-character behaviour, patterns of absence from school, lack of attention, as well as physical symptoms of abuse. Staff should also recognise the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators).
43. If staff feel that a child may be suffering abuse from their peers, they should discuss their concerns with the DSL or DDSL immediately.
44. When investigating any incident of alleged peer-on-peer abuse, the School will take into account that the abuse may indicate wider safeguarding concerns for any of the children involved. The DSL will discuss the proposed action with the child/children and their parents, and obtain consent to any referral before it is made unless it is considered unsafe to do so (for example, where a referral needs to be made immediately). The School will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. (Please also refer to **Disclosures Involving Other Pupils** (Paragraphs 75 - 79))

### Sexting

45. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops – any device that allows the sharing of media and messages. Sexting may also be called “trading nudes”, “dirties”, “pic for pic”.
46. Creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they :-
  - Take an explicit photo or video of themselves or of a friend.
  - Share an explicit image or video of a child, even if it is shared between children of the same age.
  - Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.
47. If a member of staff becomes aware of or suspects that sexting has taken place, they should inform the DSL or the DDSL immediately. Devices should not be searched unless a child is in immediate danger and staff should not require the child to delete the images, messages or videos as these will be required for the investigation of the alleged offence. If staff believe that the image has been shared on the School network, social media or website, then the School will arrange for the IT provider to block the network to all users

and isolate the image wherever possible. The image should not be moved, sent or printed. Further guidance is available from DfE document “*Screening, Searching and Confiscation: Advice for Schools (DfE January 2018)*” (Please also refer to **Disclosures Involving Other Pupils** (Paragraphs 75 - 79))

48. In order to minimise the likelihood of harm from Sexting children will be provided with information on the risks that Sexting poses as part of the PSHCE curriculum.
49. To assist the DSL in her responsibility for overseeing online safety, the School’s IT provider has set up “Smoothwall” security alerts. This automatically alerts the DSL each time either a pupil or member of staff attempts to access inappropriate sites and access is automatically blocked.

### Radicalisation

50. Children are vulnerable to extremist ideology, radicalisation and being drawn into terrorism. The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and educational establishments, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). The School will monitor carefully the activities and interests of its pupils and will cooperate fully with the police if there are any concerns about pupils being drawn into terrorism. See **Policy P2.8 Prevent Duty Policy**.

### County Lines

51. County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of “deal line”. Children can be targeted into County Lines by use of coercion, intimidation and violence, or by the promise of gifts or financial reward. One of the ways of identifying potential involvement is where pupils are missing regularly from School (or home).

### Extra-familial Harms

52. Safeguarding incidents outside School should be considered by all staff, but especially DSL’s. Staff should consider whether children are at risk of abuse or exploitation outside of their families. Extra familial harms could include (but are not limited to) sexual exploitation, criminal exploitation and serious youth violence.

### Additional Information

53. There are a number of additional risks to children which are not specifically laid out in this policy. KCSIE gives further information on other specific safeguarding issues, including: children missing from education; child sexual exploitation; so-called honour-based abuse and forced marriage; domestic abuse; homelessness; gangs; peer-on-peer abuse; and

preventing radicalisation. All staff will be provided with a copy of KCSIE Part One including Annex A and will be required to complete a “read and understood” declaration.

## Disclosure

54. If a child starts to disclose information, the person to whom the disclosure is made must **listen** carefully, **record** what has been said and **inform** the DSL.

55. If the child is in immediate danger or at risk of immediate harm, an immediate referral must be made to C-SPA and/or Surrey Police. Anyone can make a referral but the DSL should be informed of the referral as soon as possible.

56. If the disclosure is made to you, as a member of staff, you should:

- Listen carefully to what the pupil is saying and allow them to speak freely.
- Remain calm and do not overreact.
- At an appropriate time tell the pupil that you cannot promise confidentiality and must pass the information on.
- Avoid asking leading questions – staff should be aware that the way in which they talk to a pupil can have an effect on the evidence which is put forward if there are subsequent criminal proceedings.
- Demonstrate that what the child says is being taken seriously and is accepted without criticism.
- Reassure the child that he or she is right to tell and is not to blame.
- Offer, if appropriate, to support that child throughout any ensuing action that may have to be taken.
- Make brief notes of conversations either at the time of the disclosure or immediately afterwards; these should be provided to and kept by the DSL. Staff should only record the facts as the child presents them, using the child’s own words wherever possible. The notes should not reflect the personal opinions of the taker.
- When the child has finished talking, make sure he or she feels secure; explain what you are going to do next.
- Seek support if you feel distressed.

57. In a situation where there is concern that a child may be at immediate risk of harm, Surrey Police should be contacted without delay on 999. This contact can be made by any member of staff, not just the DSL and DDSL.
58. If there is no immediate risk of harm, the DSL, Mrs Joanne Field, should be contacted. In the absence of the DSL, the Deputy DSL, Mr David Bruce or Ms Angela Williams, should be informed. **Staff must not discuss disclosures with anyone other than the DSL or her deputies.** To contact the DSL please call **01932 864739**. The DSL or either DDSL can also be reached by sending an email to [DSL@menuhinschool.co.uk](mailto:DSL@menuhinschool.co.uk).
59. Regardless of how the initial report is made and to whom this is made, a cause for concern form must be completed at the earliest opportunity and sent to the DSL. A detailed record of all relevant details will be kept by the DSL.
60. The DSL acts as a source of advice, support and expertise to school staff through liaison with the relevant agencies. Whenever there is a disclosure or suspicion of abuse, the DSL will contact C-SPA within 24 hours of the disclosure. **Contact number: 0300 470 9100 Mon-Fri 9am – 5pm. Emergency duty team 24hr number: 01483 517898. There is also a secure email address for reporting concerns : [csmash@surreycc.gcsx.gov.uk](mailto:csmash@surreycc.gcsx.gov.uk)**
61. The DSL/DDSL should discuss any doubts and concerns with the C-SPA to see if the concerns meet the eligibility criteria for a referral. This may be done tentatively and without giving names in the first instance.
62. If it is agreed that the issues presented meet C-SPA criteria, a formal 'referral' will be made under the category of 'child in need'. If the allegation is against another pupil as the perpetrator, the pupil against whom the allegation is made may need to be suspended (see section **Disclosures Involving Other Pupils** below (Paragraph 75 - 79)).
63. Where there are concerns or it is clear that a child has suffered significant harm, the DSL has a duty to make a referral to C-SPA. The welfare of the child is paramount in such situations. Parents will always be informed of any child protection concerns prior to a referral being made, unless there are concerns that this may place a child at further risk of harm, may lead to the harming of an adult, or where this may jeopardise a potential criminal investigation. **It should be noted that parental consent is not required to make a referral.**
64. A child who may not have suffered, or be at risk of suffering, serious harm may still be in need of additional support from one or more agencies. The DSL will refer to C-SPA in the normal way and play a full part in any inter-agency assessment.
65. The DSL will make and keep full written and dated records of disclosures, conversations and action taken. All safeguarding records will be kept separately from the pupil's main school file. However, a mark will be made on this file to indicate the existence of the safeguarding record.

66. Although referrals to C-SPA are usually made by the DSL, any member of staff can make a referral to C-SPA or to Surrey Police. Where a referral is not made by the DSL, the DSL should be informed as soon as possible. Where a member of staff has any concern about inaction or insufficient action from the DSL, he/she may escalate this with the Head or directly with C-SPA or to Surrey Police.

## **Allegations against Staff**

67. All staff at the Yehudi Menuhin School should take great care that their behaviour or actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. In addition, at no time should staff behave in a way which could indicate that they may not be suitable to work with children or pose a risk of harm to any child whether or not this behaviour takes place inside or outside of the workplace. For example, a member of staff is involved in domestic abuse at home. No children were involved, but the School will need to consider what triggered these actions and if a child in the School could trigger the same reaction, therefore being put at risk.

68. Guidance about conduct and safe practice is given at staff induction.

69. All staff should be familiar with the relevant School policies and guidance documents:

- P2.3 Staff Code of Conduct
- Use of reasonable force (part of P3 Behaviour Management Policy)

70. Any allegation against a member of staff, volunteer or member of the governing body should be immediately referred to the Head, or in his absence, the DSL. The Head will contact the LADO. If the allegation is against the Head, the person in receipt of the allegation should contact the Chair of Governors immediately, without informing either the Head, the DSL or any other member of staff. This can be done by contacting [safe@menuhinschool.co.uk](mailto:safe@menuhinschool.co.uk).

71. If the allegation is against the Chair of Governors, the person in receipt of the allegations should contact the LADO without informing either the Head, the DSL, any other member of staff or any member of the Governing Body. Their contact number is **0300 123 1650**.

72. The DSL (or, in the case of an allegation against the Head, the Chair of Governors) will contact the designated officer at C-SPA within one working day to discuss the content of the allegation and to agree a course of action, including the involvement of the Police, and communication both with the individual and the parents of the child or children concerned. The contact number for the Surrey Local Authority Designated Officer Service is **0300 123 1650**.

73. No member of School Staff, including Governors, will have contact or attempt to contact, the staff member against whom the allegation has been made or attempt to undertake

any investigation of the allegation without prior discussion with the LADO or, in the most serious cases, with the Police.

74. The School will decide whether the individual needs to be suspended or whether alternative arrangements can be put in place. The School will give due weight to the views of the relevant authorities, including the Police, when making such a decision.
75. If a resident member of staff is suspended pending an investigation of a child protection nature, alternative accommodation will be found for him/her away from children.
76. The School will make every effort to keep such allegations confidential and guard against unwarranted publicity until either the individual is charged with an offence or, in a disciplinary case, until the DfE/TRA publishes information about its investigation or decision.
77. Any allegation made against a member of staff will be resolved as quickly as possible and all unnecessary delays should be avoided.

### **Termination of Staff Services**

78. The School will report promptly to the Disclosure and Barring Service (DBS) or the Teaching Regulation Agency (TRA) (if a dismissal does not reach the threshold for DBS referral) any person leaving the School (whether employed, contracted, a volunteer or work-experience student), whose services are no longer to be used because he or she is considered unsuitable to work with children.
79. In this context, ceasing to use a person's services includes:
  - Dismissal
  - Ceasing to use the services of a person who would have been dismissed had they not already left
  - Non-renewal of a fixed-term contract
  - No longer engaging/refusing to engage a supply teacher provided by an employment agency
  - Terminating the placement of a student teacher or other trainee
  - No longer using staff employed by contractors
  - No longer using volunteers
  - Resignation and voluntary withdrawal from supply teaching contract working, a course of initial teacher training, or volunteering
80. The School will supply as much information about the circumstances of the case as possible.
81. The contact number for the DBS referrals helpline is: **01325 953795**

## Disclosures Involving Other Pupils

82. If the disclosure does not involve another pupil, the procedure outlined above in **Disclosure** (Paragraphs 47 – 59) must be followed.
83. The School recognises that children are capable of abusing their peers. Peer-on-peer abuse by pupils in the School may be physical, sexual or emotional and may include cyber-bullying, youth-produced sexual imagery (sexting) and gender-based issues. Such behaviour will not be passed off as ‘banter’ or ‘part of growing up’. The School adheres to the **ICT Acceptable Use Policy (8.1)** and follows the guidance contained in *Sexting in schools and colleges: responding to incidents and safeguarding young people* (UKCCIS, January 2017).
84. There will be a need to distinguish between actions that can be dealt with through normal disciplinary channels and those that constitute possible abuse where involvement of other statutory agencies is required. If in any doubt, the member of staff who witnesses the incident or to whom it is disclosed, must directly contact the DSL, who will seek advice and guidance from C-SPA. If there is reasonable cause to suspect that a child has suffered, is suffering or may be likely to suffer, significant harm, the abuse will always be referred to C-SPA. Where it is clear that a crime has been committed or there is the risk of a crime being committed, Surrey Police will be contacted.
85. The School will provide appropriate support to all those involved in peer-on-peer abuse, whether perpetrator or victim.
86. The following guidelines are designed to help the DSL to clarify the situation:

### Physical Abuse

87. A one-off small-scale injury such as a bruise or mark on the skin following a disagreement between two pupils would not automatically be regarded as abuse but would nonetheless need to be recorded, properly investigated and dealt with through normal disciplinary procedures in accordance with our P3 Behaviour Management Policy, if the DSL is satisfied that it is not a safeguarding matter.
88. Systematic or regular physical injury sustained by a child from another who has not responded to normal disciplinary measures may constitute abuse, and consideration would need to be given to see if implementation of the Safeguarding procedures and/or the School’s Behaviour Management Policy was warranted.
89. Major physical injuries deliberately inflicted will involve immediate implementation of either the Safeguarding procedures or Behaviour Management policy (or both), which is

likely to include the temporary or permanent exclusion of the pupil who had inflicted the injuries. Actions will be taken following consultation with C-SPA.

### Sexual Abuse

90. Any form of sexual contact in which one pupil has not given their consent constitutes abuse and the Safeguarding procedures will be implemented. Consent is about having the freedom and capacity to choose. Consent cannot be said to have been freely given where there is an imbalance of power or where coercion has been used. Consent to sexual activity may be given to one sort of sexual activity but not another e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

91. Abuse may still occur if pupils, irrespective of age, give their consent to engage in any sexual activity for which they have limited capacity to make an informed choice, such as through inebriation.

92. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

### Emotional Abuse

93. The systematic verbal bullying of one pupil by others (including cyberbullying) can constitute abuse and has to be recognised as a serious matter. It will also be dealt with in accordance with the School's P2.1 Anti-Bullying, Racial or Sexual Harassment Policy.

94. The School recognises that the support of victims of peer-on-peer abuse (of whatever form) is as important as the treatment of the perpetrators.

### **Wider concerns**

95. We recognise that children will not raise concerns in an environment where staff fail to do so.

96. All staff (including volunteers) are required to report to the DSL, DDSL/ or Head, any concern about School practices or the behaviour of colleagues, which may put pupils at risk of abuse or other serious harm.
97. Any member of staff who raises any such concerns or makes an allegation in good faith will be provided with immunity from retribution or disciplinary action relating to such concerns or allegations in accordance with the School's Whistleblowing Policy (10.19).

## Supporting Pupils

98. All pupils should be encouraged to be open and to feel that they can share information they wish with any adult in the School whom they trust. We should not pry into a child's life but provide an environment in which the children and young people feel safe and secure and where they will have the maximum opportunity to speak freely about concerns and worries.
99. Relevant areas of the School's curriculum, in particular full-school morning meetings and PSHCE, are used to raise students' awareness of how to keep themselves safe, including online and when accessing wi-fi provision. See ICT Acceptable Use Policy (8.1).
100. All pupils should be encouraged to speak to their preferred member of staff if they learn of any allegation of abuse.
101. In providing such a supportive environment, pupils must understand that no member of staff can promise confidentiality. If information needs to be shared, the pupil will be informed (if possible) before the disclosure is made to a third party. A member of staff may never promise to a pupil that they will keep a secret.
102. The roles of the School's Counsellor is fulfilled by Gemma Sharp who can be contact by email via [counsellor@menuhinschool.co.uk](mailto:counsellor@menuhinschool.co.uk) .
103. The role of Independent Listener is filled by Reverend David Ireland who can be contacted by email via [talk@menuhinschool.co.uk](mailto:talk@menuhinschool.co.uk)
104. Advice for Pupils living away from home can also be gained from the Children's Commissioner by calling Freephone 0800 528 0731, website [www.childrenscommissioner.gov.uk/help-at-hand/](http://www.childrenscommissioner.gov.uk/help-at-hand/)
105. Other sources of help include:
- Childline (Freephone 0800 11 11) or [www.childline.org.uk](http://www.childline.org.uk)
  - NSPCC (0808 800 5000) or [www.nspcc.org.uk](http://www.nspcc.org.uk)
  - Samaritans (116 123) or [jo@samaritans.org](mailto:jo@samaritans.org) or [www.samaritans.org](http://www.samaritans.org)

106. Sources of help both inside and outside of the School are made known to all pupils and contact details are displayed clearly around the School.

### **Children in need or at particular risk**

107. We recognise that, since many of our pupils live away from home for much of the year, a considerable proportion do not have English as a first language. This may, in some cases, make communication more difficult and staff take this into account, especially when dealing with disclosures.

108. In particular we recognise that additional measures are necessary to safeguard pupils in one-to-one or off-site tuition and in musical activity away from School. See **P2.3 Staff Code of Conduct and Policy to Safeguard and Promote the Health and Safety of Pupils on Activities outside the School (including Concert Tours) (5.3)**

109. If any pupils are looked after by a local authority, the School will ensure that appropriate staff have the skills, knowledge and understanding necessary to keep them safe by making available the information needed about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers, as well as any other relevant information given to the DSL.

110. At The Yehudi Menuhin School we will support all our pupils by making sure:

- Pupils feel valued and respected;
- Self-esteem is encouraged throughout the curriculum as well as in our relationships;
- We promote a caring, safe and positive environment;
- All staff are alert to the possible vulnerabilities of our pupils and are confident about how to implement safeguarding procedures;
- Our pupils have access to an independent listener who is not part of the School's management; this person is Revd. David Ireland and his contact details are made available to all pupils via the notice boards and also contained in paragraph 96 of this policy;
- Pupils also have access to a School Counsellor; this person is Gemma Sharp and her contact details are made available to all pupils via the notice boards and also contained in paragraph 95 of this policy;
- Information is displayed around the School about how to access help from services such as Childline, NSPCC, the Samaritans and the Children's Commissioner;
- There are clear procedures for referring safeguarding concerns to C-SPA.

### **Confidentiality**

111. At the Yehudi Menuhin School we recognise that matters relating to safeguarding and child protection are confidential and that relevant staff have due regard to the data

protection principles which allow them to share or withhold relevant personal information.

112. The DSL or her deputy will disclose information to staff only on a need-to-know basis.
113. All staff are aware that in order to safeguard children they have a professional responsibility to share information with other agencies.
114. All staff are aware that they cannot promise to keep secrets which might compromise a child's wellbeing or safety or that of another person.
115. Parents will be informed of our intent to refer a child to social care unless to do so would put the child at greater risk or potentially impede a criminal investigation.
116. Pupils, staff, volunteers and parents are aware of the School's legal duty to retain safeguarding records well beyond the individual's attendance at the School via our Privacy Notices (See **P90.1** and **P90.3**), which are available via our School website.

### **Supporting Staff**

117. At the Yehudi Menuhin School we recognise that working with children who have or are likely to suffer harm can be stressful and upsetting. The DSL will seek to provide support for staff and make additional sources of help available as needed.

### **Safer Recruitment**

118. The School is committed to using safer recruitment procedures and undertakes to ensure that at least one member of all interview and recruitment panels has undergone statutory Safer Recruitment training. For details, see **P4.1 Recruitment Policy**.

### **Links to other School Policies**

119. This policy should be read in conjunction with:
- **Anti-Bullying, Racial and Sexual Harassment Policy (P2.1)**
  - **Staff Code of Conduct (P2.3)**
  - **Guidelines for the use of Deputy Instrumental Teachers (2.5)**
  - **Independent Listener Policy (P2.5)**
  - **Prevent Duty Policy (P2.8)**
  - **Procedure if a Child goes missing (2.9)**
  - **Behaviour Management Policy (P3)**
  - **Recruitment Policy (P4.1)**
  - **Health and Safety Policies**

- **Risk Management Policy (P5.2)**
- **Policy to Safeguard and Promote the Health and Safety of Pupils on Activities outside the School (including Concert Tours)(5.3)**
- **Attendance and Absence Policy (6.1)**
- **Guardianship Policy (P8)**
- **ICT Acceptable Use Policy (8.1)**
- **Communications Policy (10.7)**
- **Confidentiality Policy (10.8)**
- **Whistleblowing Policy (10.19)**
- **Privacy Notice for Parents & Pupils (P90.1)**
- **Privacy Notice for Job Applicants & Staff (P90.3)**

Appendix A – List of Contact Details

Appendix B – Safeguarding & Child Protection during COVID-19

## Appendix A – List of Contact Details

<b>DSL</b> Joanne Field	<a href="mailto:DSL@menuhinschool.co.uk">DSL@menuhinschool.co.uk</a>	01932 584745 07493 220553
<b>DDSL</b> David Bruce Angela Williams	<a href="mailto:DSL@menuhinschool.co.uk">DSL@menuhinschool.co.uk</a> <a href="mailto:DSL@menuhinschool.co.uk">DSL@menuhinschool.co.uk</a>	01932 584798
<b>Head</b> Ben Gudgeon	<a href="mailto:head@menuhinschool.co.uk">head@menuhinschool.co.uk</a>	01932 864739
<b>Chair of Governors</b> David Buckley	<a href="mailto:safe@menuhinschool.co.uk">safe@menuhinschool.co.uk</a>	
<b>C-SPA</b> Surrey Children’s Single Point of Access	<a href="mailto:csmash@surreycc.gcsx.gov.uk">csmash@surreycc.gcsx.gov.uk</a>	0300 470 9100 (Mon – Fri 09:00 – 17:00)  01483 517898 (out of hours)
<b>Surrey Police</b>		999
<b>LADO</b> (Local Authority Designated Officer)		0300 123 1650
DBS Referrals Helpline		01325 953795
Independent Listener	<a href="mailto:talk@menuhinschool.co.uk">talk@menuhinschool.co.uk</a>	
School Counsellor	<a href="mailto:counsellor@menuhinschool.co.uk">counsellor@menuhinschool.co.uk</a>	
Children’s Commissioner		0800 528 0731
Childline	<a href="http://www.childline.org.uk">www.childline.org.uk</a>	0800 11 11
NSPCC	<a href="http://www.nspcc.org.uk">www.nspcc.org.uk</a>	0808 800 5000
Samaritans	<a href="http://www.samaritans.org">www.samaritans.org</a>	116 123

## Appendix B – Safeguarding & Child Protection during COVID-19 (Added 08.04.2020)

### Background

120. The World Health Organisation (WHO) declared the COVID-19 outbreak a global pandemic on 11<sup>th</sup> March 2020 pointing to 118,000 cases of coronavirus in over 110 countries and territories around the world and the sustained risk of further global spread.
121. The UK Government subsequently instructed all schools to close on Friday 20<sup>th</sup> March 2020. This included Independent Schools with Residential Provision. School were told to remain open only for the children of Key Workers and vulnerable children.
122. The School determined that no pupils at the school were the children of key workers and no pupils were considered vulnerable under the guidance provided by the UK Government. The School site therefore closed to pupils with boarding pupils either having returned home to their families or staying with UK guardians.
123. The School will continue to provide academic and music lessons along with pastoral care to its pupils via remote learning and email/telephone contact during the period in which pupils and staff are unable to be present on the school site.
124. During this period, it is essential that the School continues to follow guidance set out in KCSIE 2019 and subsequent government advice in regard to safeguarding and child protection.
125. This Appendix has been written having regard to guidance issued by the Department for Education in its Guidance document “Coronavirus (COVID-19): safeguarding in schools, colleges and other providers” published on 27<sup>th</sup> March 2020.

<https://www.gov.uk/government/collections/coronavirus-covid-19-guidance-for-schools-and-other-educational-settings>

### Arrangements during School Site Closure

#### Online Safety

126. The School is increasing its use of technology in order to provide education to its pupils. This includes the use of remote learning platforms to provide both academic and music tuition. The School strongly recommends that all online lessons are recorded for the protection of staff and pupils. If you need technical assistance with how to do this, please contact Reception or the DSL.

127. The School issued its “Remote Learning and Teaching Procedure” to staff, pupils and parents and “Remote Working Procedure” to staff, on 17<sup>th</sup> March 2020. These documents were reviewed and approved by Surrey Safeguarding Team.
128. Staff are encouraged to complete the Online Safety training module available to all staff via EduCare.
129. Staff are reminded that under no circumstances should they use their personal electronic devices to take or store images of pupils without obtaining permission in advance from the Head. This includes:
- Taking images of pupils for their own personal use (including for their own professional websites etc.)
  - Display or distribute images of pupils unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child)
  - Take images of pupils using personal equipment
  - Take images of pupils in a state of undress or semi-undress (including for example in nightwear)
  - Take images of a pupil’s injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children’s social care
  - Make audio recordings of a pupil’s disclosure
  - Take images of children which could be considered as indecent or sexual
130. Staff must always ensure that their use of technologies could not bring the school into disrepute and must never discuss or share data relating to pupils/parents/carers/guardians in social media groups.

#### Peer on Peer abuse

131. Although pupils will no longer be on site together there is still the risk of peer on peer abuse, particularly in the form of cyberbullying and the sharing of indecent images of children. (See Paragraph 35 for full definition of Peer on Peer abuse).
132. Where staff, parents or pupils become aware of, or are subjected to, any form of peer on peer abuse, this should continue to be reported to the DSL. (See paragraph 126 below).

#### Reporting Concerns and general safeguarding questions

133. Parents, Staff and pupils should continue to report any concerns or to ask any questions regarding safeguarding. There will always be a DSL on duty although they will not be present at the School site. To contact the duty DSL, email [DSL@menuhinschool.co.uk](mailto:DSL@menuhinschool.co.uk). Email messages will be checked daily, including weekends.

134. Where it is believed there is an immediate risk of harm, please contact the Police via 999. Please then inform the DSL.
135. Surrey Children's Single Point of Access (C-SPA) remains available and the DSL is able to continue to raise areas of concern with them. Mechanisms for referral to C-SPA are still in place.
136. Low level concerns should continue to be reported by staff using the concern forms. It is important that these are still logged. Please ensure that any forms are stored and sent appropriately, ensuring that files are sent only using school email addresses and are password protected. Passwords should either be agreed by telephone or covered by a separate email.
137. Any safeguarding concerns which come to light during any recorded lesson, should also be highlighted to the DSL and copies of the recorded lesson must be made available to the DSL/DDSL on request. These concerns will be followed up in the same way as any other concern of this nature.

#### Mental Health and Wellbeing

138. As we continue to live in unprecedented times, it is recognised that the mental health and wellbeing of pupils, parents and our staff could be adversely impacted. When in School, we are able to provide high standards of pastoral care however this is more difficult during periods when pupils are off site.
139. Each week, the Head of Pastoral Care and DSL, Joanne Field, along with the DDSL and Houseparent of Harris House, Angela Williams, will request an email update from parents/guardians on the health and wellbeing of pupils and their family. (Joanne will contact the female pupil's families, and Angela the male pupil's families.) This will include for example, how pupils are coping with separation from their friends, with access to online technology, their physical health etc. Regular telephone and email contact will also be made with the pupils direct to discuss how they are feeling and to enable any low level concerns to be noted and followed up. The DSL will keep an overview for all pupils where any major issues are identified as a result of this contact.
140. Where staff are concerned for pupils this should be reported using the concern forms as per Paragraph 129 above.

#### Attendance & Children Missing From Education

141. During the period where school sites are closed it is much more difficult to identify any children missing from education. Each pupil however, continues to have lessons timetabled for them during term time which they are expected to 'attend', albeit from a remote location. The timetabling of lessons has been done taking into account the pupil's geographic location and difference in time zones in order to

enable full participation wherever possible. Accordingly, teachers continue to monitor 'attendance' at these lessons and absences will be followed up. Staff should report pupils failing to 'attend' lessons by contacting the pupil's tutor and then the Director of Academic Studies, where absence has not been previously authorised.

142. The School is also required to continue to follow the pupil attendance regulations (and UK Visa & Immigration regulations where relevant) and must report continued absences in accordance with these regulations.

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