

7A



EDGEBOROUGH SCHOOL

## **Safeguarding and Child Protection Policy**

(including EYFS and Boarding)

**UPDATE LOG**

<b>DATE</b>	<b>CHANGE</b>	<b>Pages changed</b>	<b>By Whom</b>
23.01.18	Major update and review		DJWT + CH
27.01.18	ELT policy day review + approval		ELT
28.01.18	Added appendices	P.25 and beyond	DJWT
13.04.18	Updated staff contact details	P.5	DJWT
03.09.18	Updated following latest KCSIE 18 and WT 18	P.8, 18, 19, 24, 25, 43	DJWT
04.09.18	Updated DDSL contacts	P. 5, 10, 48	DJWT
30.09.18	Read through		DJWT
15.10.18	Highlighted CH as DSL for EYFS	P.5 + 10	DJWT
	Added extra detail to peer on peer abuse section	P. 32	
	Updated sexual abuse definition	P.27	
	Addition to induction covering how to handle a report on child-on-child sexual violence	P.13	
16.10.18	Added RS as another member of staff trained to DSL level		DJWT
06.09.2019	Updated following KCSiE 2019 throughout document		CH +CJ
	Updated terminology throughout document in lines with Surrey Safeguarding Partners		
	Safeguarding Partners and Agencies	p9	
	Contextual safeguarding	p10	
	Updated DDSL's	p7, p12	
	Whistleblowing updated	p13, p14	
	Self-Reporting Update	p15	
	Mental Health Update	p15	
	Induction Training	p16	
	Pupil Education	p17, p18	
	Reference to corporal punishment – EYFS	p19	
	Family Resilience and Safeguarding	p20, p21	

	<p>Update safeguarding procedures</p> <p>Boarding schools, children's home and host families</p> <p>Reporting and Referral Procedures</p> <p>GDPR and Record Retention</p> <p>Developmental Sexual Activity update</p> <p>Voyeurism</p> <p>Serious Violence</p>	<p>p24 (m)</p> <p>p25</p> <p>p24, p25</p> <p>p30</p> <p>p35</p> <p>p40</p> <p>p40</p>	
11.09.2019	<p>Update terrorism</p> <p>Update Safety Online</p> <p>Private Fostering</p> <p>Children Missing Education</p> <p>Referral procedure update – method for alerting the DSL</p> <p>Update further guidance for staff – training opportunities</p> <p>GDPR update</p> <p>Exploitation of Children including County Lines</p> <p>Peer on Peer abuse update</p>	<p>P9, p10</p> <p>p19</p> <p>p20</p> <p>p22, p23</p> <p>p25</p> <p>p26</p> <p>p30</p> <p>p37</p> <p>p38-p40</p>	CH+CJ
25.05.2020	<p><b>DfE Safeguarding Advice for Covid-19 and the Phased return to School Programme</b></p> <p>Key Personnel</p> <p>Working Together, External Agencies and Safeguarding Agencies</p> <p>Mental Health SEND</p> <p>References and Statutory Guidance</p> <p>The DSL and Training</p>	<p>P 8</p> <p>P 8</p> <p>P 10</p> <p>P 11</p> <p>P 13</p>	CH

	<p>Staff</p> <p>Mental Health Support</p> <p>Anti-Bullying and Cyber Bullying</p> <p>Online Safety</p> <p>Children in Need</p> <p>Children at Risk</p> <p>Reporting and Referral</p> <p>Further Guidance to Staff</p> <p>Safer Recruitment and Lists of Staff and Children in School during the Phased Return Programme</p>	<p>P 14</p> <p>P 16</p> <p>P20</p> <p>P21</p> <p>P 22</p> <p>24</p> <p>P26</p> <p>P 28</p> <p>P 32</p>	<p>CH</p>
04/11/2020	<p>Amendments made according to changes made in KCSIE 2020 and Covid-19 legislation.</p> <p>DSL job description added to the Appendices.</p> <p>Definitions of child abuse and key indicators moved from the Appendices to the main document.</p> <p>Amendments made throughout the document to ensure adherence to the ISI compliance document 2020.</p> <p>Staff Code of Conduct updated and added.</p>	<p>P.60</p> <p>p.10-12</p> <p>p.63</p>	<p>EB/CH</p> <p>EB</p> <p>EB</p> <p>EB/DJWT/CH</p>
07/01/2021	Updated name of DSL from Clive Holder to Ellie Buckley (CH as DDSL)	Throughout	EB
18/03/2021	Policy reviewed and approved by The Edgeborough School Governors		
08/09/2021	<p>Amendments made according to changes made in KCSIE 2021</p> <p>Updates made to Key Personnel including the Safeguarding Governor</p> <p>Specific references to Covid-19 removed</p> <p>Updated section on Safeguarding for Boarders</p> <p>Updated allegations against adults to include the harm threshold and low-level concerns</p> <p>Updated Code of Conduct added to Appendix</p>		EB
05/10/2021	Policy reviewed and approved by The Edgeborough School Committee		

## Contents

<b>Key Personnel and Contacts .....</b>	<b>8</b>
<b>Policy statement .....</b>	<b>9</b>
Guiding principles/General Statement of The School’s Commitment to safeguarding .....	9
Aims .....	9
<b>Children at Risk.....</b>	<b>10</b>
Mental Health .....	13
Inclusiveness .....	13
SEND.....	14
Safeguarding Partners and Agencies .....	14
<b>Making Social Care assessments: if the School needs to make a social care referral, as much information will be given as possible in order to help the assessment to take into account contexts outside the home.....</b>	<b>14</b>
Terrorism.....	14
Contextual Safeguarding.....	15
Parental awareness.....	15
<b>References and Statutory Guidance.....</b>	<b>15</b>
<b>These protective measures, especially the KCSIE document, continue to be the statutory information to all staff members. This policy is written with full regard to the latest statutory guidance including: .....</b>	<b>15</b>
<b>Roles and Responsibilities .....</b>	<b>15</b>
The Governing Body.....	15
The Designated Safeguarding Lead (DSL) .....	17
Staff (including temporary, visiting and volunteers) .....	17
<b>Whistleblowing.....</b>	<b>18</b>
Self-Reporting .....	18
<b>General Data Protection Regulation GDPR.....</b>	<b>19</b>
<b>Induction and Training .....</b>	<b>20</b>
Training Opportunities for Staff - General points .....	21
<b>Staff contribution to and understanding of Safeguarding Policies and Procedures .....</b>	<b>22</b>
<b>Pupil Education.....</b>	<b>22</b>
Anti-Bullying and Peer-on-Peer Abuse .....	23
Physical Intervention .....	25
Use of Mobile Devices by Adults .....	25
<b>Early Years Specific Requirements .....</b>	<b>25</b>

<b>Cameras</b> .....	<b>25</b>
<b>Mobile phones</b> .....	<b>26</b>
<b>Intimate Care</b> .....	<b>26</b>
<b>Visitors’ Policy: Nursery and Pre-Prep</b> .....	<b>26</b>
<b>Safety online</b> .....	<b>27</b>
<b>Private Fostering</b> .....	<b>28</b>
<b>Family Resilience and Safeguarding</b> .....	<b>29</b>
<b>Children in Need</b> .....	<b>29</b>
<b>Early Help</b> .....	<b>29</b>
<b>Children Missing Education</b> .....	<b>31</b>
<b>Elective Home Education</b> .....	<b>31</b>
<b>Safeguarding Procedures</b> .....	<b>32</b>
<b>Reporting and Referral Procedures: To be used for all Pupils and for Boarders</b> .....	<b>33</b>
<b>The School Safeguarding Portal (CPOMS) will be used to keep an up-to-date record of all Safeguarding, Pastoral, Well-being and Mental Health concerns and issues.</b> .....	<b>33</b>
<b>Safeguarding of Boarders</b> .....	<b>33</b>
<b>Boarding schools, children’s home and host families</b> .....	<b>33</b>
<b>Access to Premises</b> .....	<b>33</b>
<b>Supervision of staff</b> .....	<b>34</b>
<b>Guardians and Lodgings</b> .....	<b>34</b>
Referral procedure guiding principles .....	35
Method for reporting concerns to the DSL.....	36
Further guidance for staff.....	36
<b>Staff behaviour and Staff Code of Conduct</b> .....	<b>37</b>
<b>Parents</b> .....	<b>37</b>
<b>Appendix A: Supplementary information on types and signs of abuse</b> .....	<b>38</b>
Abuse: .....	38
Sexual Abuse by young people: .....	38
Developmental Sexual Activity .....	38
Inappropriate Sexual Behaviour: .....	39
Child Sexual Exploitation:.....	40
Exploitation of Children including County Lines .....	41
Voyeurism .....	41
Serious violence .....	41

Youth produced sexual imagery (sexting)/Consensual and non-consensual sharing of nudes and semi-nude images/videos: .....	42
Domestic Abuse/Domestic Violence (DV):.....	43
‘So-Called’ Honour Based Violence (HBV): .....	44
Forced Marriage (FM): .....	44
Female Genital Mutilation (FGM): .....	44
The ‘One Chance’ rule:.....	46
The Symptoms of Stress and Distress: .....	46
Parental Signs of Child Abuse: .....	46
Indicators of Vulnerability to Radicalisation:.....	46
<b>Appendix B: Procedure for Staff Facing Allegations of Abuse.....</b>	<b>49</b>
<b>Low-level concerns .....</b>	<b>55</b>
<b>Appendix D: Key points to follow if you suspect or are told of abuse .....</b>	<b>57</b>
<b>Appendix E: Cause for concern forms and body maps .....</b>	<b>58</b>
<b>Appendix F: Child Protection Procedures Flowchart .....</b>	<b>60</b>
<b>Appendix H: Staff Code of Conduct .....</b>	<b>63</b>

## Key Personnel and Contacts

Name	Position	Contact
Ellie Buckey (Deputy Head Pastoral and Head of Boarding)	Designated Safeguarding Lead (DSL)	<a href="mailto:ebuckey@edgeborough.co.uk">ebuckey@edgeborough.co.uk</a> 01252 797004
Gill Iffland (Head of Years 1 & 2)	Deputy Designated Safeguarding Lead (DDSL)	<a href="mailto:giffland@edgeborough.co.uk">giffland@edgeborough.co.uk</a> 01252 792495
Duncan Yates (Assistant Housemaster)	Deputy Designated Safeguarding Lead (DDSL)	<a href="mailto:dyates@edgeborough.co.uk">dyates@edgeborough.co.uk</a> 01252 792495
Jayne Symons (Head of Pre-Prep)	Deputy Designated Safeguarding Lead (DDSL) (EYFS)	<a href="mailto:jsymons@edgeborough.co.uk">jsymons@edgeborough.co.uk</a> 01252 792495
Caroline Brown	Safeguarding Governor	Contactable via the Bursar, Sarah Riley
Vicky Tuck	Chair of Governors	Contactable via the Bursar, Sarah Riley

At least one of the Safeguarding team is a member of the school's Executive Leadership Team (ELT)

**Covid-19 arrangements: if the DSL were to be away, the DDSLs would maintain the Safeguarding responsibilities for the school.**

## External Contacts

Name	Position	Contact
Local Authority Designated Officer	LADO	0300 123 1650
Local Area Contact details	Surrey (South West)	0300 123 1640

Edgeborough School's Safeguarding Partnership is the **Surrey Children's Safeguarding Board**. (Surrey Police, Surrey County Council, Guildford and Waverly Clinical Commissioning Group)

If you are concerned about the safety of a child, young person or an adult you can contact the Safeguarding Partnership by using the Single Point of Access (SPA) which is the umbrella term for the front door to support. It provides direct information, advice and guidance. The SPA is the conduit for access to services at levels 3 and 4 of Effective Family Resilience.

Availability: 9am to 5pm, Monday to Friday

- Phone: **0300 470 9100**
- Out of hours phone: **01483 517898** to speak to the emergency duty team.
- Email: emails are dealt with during normal office hours
  - For concerns for a child or young person: [csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk)
  - For concerns for an adult: [asmash@surreycc.gov.uk](mailto:asmash@surreycc.gov.uk)

**If at any point, there is a risk of immediate serious harm to a child, a referral should be made to the children's social care or the police on 999 immediately. ANYBODY CAN MAKE A REFERRAL but the person must then inform the DSL. Parental consent is not required for referrals to statutory agencies.**

## **Policy statement**

### **Guiding principles/General Statement of The School's Commitment to safeguarding**

The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all its pupils within all the activities that it undertakes. The School will endeavour to provide a safe and welcoming environment where all pupils feel secure, respected and valued.

The School are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support and protection. The School promotes the welfare of our pupils at all times.

Child protection forms part of the School's safeguarding responsibilities. It recognises that the protection of pupils is the responsibility of everyone involved in their care and that there is a need for staff to be adequately trained so that they can act appropriately to any concerns that arise. It emphasises to all staff the fact that 'It could happen here'.

Our School Safeguarding Policy is based closely on four documents: Keeping Children Safe in Education 2021, Working Together to Protect Children 2018, RSHE statutory guidance 2019 and Prevent 2015.

This Safeguarding Policy is reviewed at least annually and approved by the School's Governing Body; in this manner, the proprietors of the school maintain proper oversight of safeguarding at Edgeborough.

## **Aims**

This policy seeks:

- a) To ensure children receive the right help at the right time to address risks and prevent issues escalating.
- b) To emphasise the importance of noticing and referring the early signs of abuse and neglect, sharing information and challenging inaction.
- c) To provide pupils with relevant information, skills and attitudes to help them to resist abuse and prepare them for the challenges faced at senior school and then for the responsibilities of adult life including home and family.
- d) To increase pupils' self-confidence, mutual respect and trust and develop their emotional awareness and vocabulary so that they can be conscious, clear and confident in their assessment of their emotional well-being.
- e) To make pupils feel confident that they can confide in staff on issues of neglect, abuse and deprivation.
- f) To ensure there is a whole-school approach to peer-on-peer abuse and that staff are aware of how to deal with it.
- g) To allow staff to be familiar and confident with the appropriate child protection procedures and issues.

- h) To give clear guidance to all staff, teaching and non-teaching on:
  - The signs that may indicate the possibility of abuse.
  - The procedures to follow if a child discloses abuse or a member of staff suspects abuse.
- i) To work with parents to build an understanding of the school's responsibility to ensure the welfare of all children and a recognition that this may occasionally require cases to be referred to other investigative agencies as a constructive and helpful measure.
- j) To monitor children who have been identified as 'at risk' including those who may be at risk of being drawn into terrorism.
- k) To contribute to an inter-agency approach to child protection by developing effective and supportive liaison with other agencies and schools – thereby contributing towards a more effective detection of any incidences of child abuse.
- l) To review the school procedures and improve the way child protection issues are managed.

## Children at Risk

Staff must report any concerns about a child's welfare.

A child at risk is one who is suffering significant harm, or is likely to do so. Action should be **immediate**.  
**IF A CHILD IS AT RISK OF IMMEDIATE HARM, STAFF SHOULD CALL 999.**

Concerns should be reported by staff to the DSL who will refer to Social Services and/or the police if a crime committed. This will be within immediately but at least within 24 hours of the report being received by the DSL.

**If at any point, there is a risk of immediate serious harm to a child, a referral should be made to the children's social care immediately. This type of referral does not require parental consent. ANYBODY CAN MAKE A REFERRAL but the person must then inform the DSL.**

## Early Years Foundation Stage (EYFS)

The School is an EYFS registered setting. Any allegations against people living or working on the premises, or of any other abuse alleged to have taken place on the premises, must be reported to Ofsted as soon as is practical and within 14 days at the latest.

## What Constitutes Child Abuse and Neglect?

All adults who work or volunteer with children should be able to identify concerns about child abuse.

**Abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm.

The four types of abuse, described in *Keeping Children Safe in Education September 2021* are:

**Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, drowning, suffocating, inducing illness or causing physical harm in any other way.**

**Physical signs to that may be present:**

Multiple bruising.

Cigarette burns.

Bite marks.

Black eyes.

Double bruise (small) indicating a pinch.

Injuries/bruising of an odd shape which may be caused by an object.

Burns or scolds.

Bruising in sites not easily injured.

Frequent bruising.

A hand mark may indicate a slap.

An irregular bruise may indicate a punch or a knock.

A bite mark, black eye, ear injuries, walking awkwardly may indicate a kick.

Mental health problems.

**There may be other less obvious signs of physical abuse:**

Frozen watchfulness.

Withdrawal from physical contact.

Running away.

Fear of returning home.

Unusual lack of parental concern.

Differing account of events.

Injuries noticed by others and not reported by the family.

High level of demand for investigations for symptoms which do not present physical signs.

Delay or failure to seek medical attention.

**Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.**

**Signs:**

A child is usually unresponsive or distant and withdrawn

Notice persistent negative comments

The child seeks adult company and solace a lot

Difficulty in communicating and establishing relationships

Low self-esteem

Not friendly with peers and vice-versa. Children who are victims of emotional abuse don't want to be different and find rejection very hard.

Running away

Fear of returning home

A high level of demand for investigations for symptoms which do not present physical signs

Mental health problems.

**Sexual abuse: involves forcing or enticing a child to take part in sexual activities. This can involve physical acts, non-contact actions such as viewing inappropriate images or online activities.**

**Please note that the sexual abuse of children by other children is a specific safeguarding issue in education.**

## **Child Criminal and Sexual Exploitation**

The vulnerability of children involved in criminal exploitation is not always recognised by adults and professionals. The indicators of exploitation can be different for boys and girls. This type of abuse can be a one-off or can occur over a period of time.

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to manipulate or deceive a person under the age of 18. Like all forms of child sex abuse, child sexual exploitation can take place in person or via technology or via a combination of both.

### **Some of the following signs may be indicators of sexual exploitation:**

Children who appear with unexplained gifts or new possessions;

Children who associate with other young people involved in exploitation;

Children who have older boyfriends or girlfriends;

Children who suffer from sexually transmitted infections or become pregnant;

Children who suffer from changes in emotional well-being;

Children who misuse drugs and alcohol;

Children who go missing for periods of time or regularly come home late;

Children who regularly miss school or education or do not take part in education.

**Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.**

### **This is difficult to see as there will not always be outward physical signs.**

#### **Some telling signs are:**

Growth failure (particularly poor weight gain).

Developmental delay (language, motor skills, social skills)

Inappropriate clothing for the time of year.

Poor general physical appearance

Poor hygiene or sudden drop in weight

Lacking self-esteem

Extremes of behaviour

Aimless

Social skills are not good. A victim of neglect fears being rejected and failing.  
Mental health problems.

## Specific safeguarding issues

The School recognises other safeguarding issues:

Child Sexual Exploitation, Female Genital Mutilation, bullying and other forms of peer abuse (including cyber-bullying and child-on-child abuse), sexual harassment and sexual violence, domestic violence/abuse, drugs, cybercrime, fabricated or induced illnesses, child abduction and community safety incidents, faith abuse, forced marriage, gangs and youth violence, child criminal exploitation, homelessness, county lines, children missing in education (CME), children and the court system, children with family members in prison, so-called 'honour-based' violence (HBV), upskirting, gender-based violence/violence against women and girls, mental health, homelessness, preventing radicalisation, sexting, teenage relationship abuse, recognising the vulnerability of children with SEND, modern slavery and the National Referral Mechanism, issues surrounding private fostering and trafficking.

The School will endeavour to identify and act upon any forms of abuse according to our procedures. We recognise that "for children who need additional help, every day matters" (Working together to safeguard children, 2018)

*Further information on signs of abuse can be found in Appendix A of this policy.*

## Mental Health

The School is committed to offering important opportunities to prevent mental health problems by promoting resilience. The School supports pupils who are experiencing high levels of psychological stress or who are at risk of developing mental health problems. Providing pupils with inner resources that they can draw on as a buffer when negative or stressful things happen helps them to thrive even in the face of significant challenges. This is achieved through ensuring children have a wide support network including parents, supportive staff, friendship groups and a variety of ways of communicating concerns. This is fully embedded in our PHSE curriculum. Where there is concern regarding mental health staff should communicate this to the DSL, along with a concern form detailing their observations. The DSL is then responsible for liaising with the school counsellor and communicating with parents and if appropriate suggesting they seek help from their GP and making a referral to The Children's Adolescence Health Services (CAMHS).

For more information, please see: [https://www.nhs.uk/every-mind-matters/?WT.tsrc=Search&WT.mc\\_id=MentalHealthGeneric&gclid=EA1aIQobChMIodqrgvug8wIVV-d3Ch1koQB1EAAYASAAEgJLLvD\\_BwE&gclidsrc=aw.ds](https://www.nhs.uk/every-mind-matters/?WT.tsrc=Search&WT.mc_id=MentalHealthGeneric&gclid=EA1aIQobChMIodqrgvug8wIVV-d3Ch1koQB1EAAYASAAEgJLLvD_BwE&gclidsrc=aw.ds)

## Inclusiveness

The School believes that all pupils have the right to be safeguarded from harm and exploitation regardless of:

- Race, religion, culture, preferred language or ethnicity
- Age, gender, sexuality, appearance or disability, academic ability

## SEND

The School recognises that pupils with SEND can face additional safeguarding challenges which can include:

- Assumptions that indicators can relate to a child's disability rather than abuse (such as behaviour, mood or injury).
- Failure to show outward signs which can be disproportionate to the abuse they may be experiencing.
- Communication barriers and difficulties overcoming these barriers or reporting these challenges.
- The fact that these children are more prone to peer group isolation or bullying than other children.

## Safeguarding Partners and Agencies

The School will operate safeguarding matters in line with locally agreed inter-agency procedures with the Local Education Authority (LEA) and the three safeguarding partners (Surrey Police, Surrey County Council and Guildford and Waverley Clinical Commissioning Group). This also includes support from: Early Help, Child in Need, MAP, C-SPA, Surrey police, Social Services and the LADO. The School uses the Child Protection Procedures Flowchart (Appendix F) in protecting children from harm and responding promptly and positively towards actual and alleged child abuse.

**Making Social Care assessments:** if the School needs to make a social care referral, as much information will be given as possible in order to help the assessment to take into account contexts outside the home.

## Terrorism

The school recognises that terrorism is a very real threat to young people. Normal referral processes are available where there are concerns about children who may be at risk of being drawn into terrorism. As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the DSL. The DSL would then look for support from Channel and the SSCB.

All staff at the School have completed the government's online Prevent training or Prevent training through Educare. Their certificates are held by the DSL. The DSL is able to support staff with any concerns they may have.

The School uses the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

The School is committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the

fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

## Contextual Safeguarding

The School recognises and responds to pupils' experiences and exposure to the possibility of significant harm beyond their families and into the context of the wider community. It recognises that the different relationships that pupils/ young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. All staff should be aware of the need to recognise and report signs that a child is experiencing abuse, no matter where that abuse is occurring.

## Parental awareness

All parents, carers and guardians are made aware of the responsibilities of staff members with regard to child protection procedures, through publication of this Safeguarding Policy on our school website.

## References and Statutory Guidance

These protective measures, especially the KCSIE document, continue to be the statutory information to all staff members. This policy is written with full regard to the latest statutory guidance including:

- Working Together to Safeguard Children (Aug 2018), as amended 1<sup>st</sup> Aug 2018 but still dated July 2018
- Keeping Children Safe in Education, including Annex A (Sept 2021)
- Disqualification under the Childcare Act (2006) including new legislation in force from 31<sup>st</sup> August 2019
- What to do if you're worried a child is being abused (March 2015)
- Information sharing (July 2018)
- Prevent Duty Guidance: for England and Wales (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
  - The Prevent duty: Departmental advice for schools and child care providers (June 2015)
  - The use of social media for online radicalisation (July 2015)

## Roles and Responsibilities

### The Governing Body

The School's Safeguarding governor is **Mrs Caroline Brown**. She has specific responsibility for Safeguarding and Child protection issues. She, the DSL or the Head ensure that all governors are kept informed of any safeguarding issues as well as updating governors on training and policy changes. The

Safeguarding Policy is ratified by governors at least annually. Safeguarding is a fixed agenda item on every full governing body meeting.

The Governing Body is responsible for:

- Ensuring that the School complies with their duties under legislation.
- Ensuring that policies, procedures and training in the School are effective and comply with the law at all times.
- Appointing a Board level lead to take responsibility for the School's safeguarding arrangements.
- Ensuring that there are appropriate policies and procedures in place in order to ensure appropriate action can be taken in a timely manner to safeguard and promote children's welfare including:
  - an effective Safeguarding Policy which:
    - Describes procedures in accordance with legislation and put in place by the Safeguarding Partnerships;
    - Is updated annually;
    - Is available publicly on the School's website;
    - Is adhered to by all staff.
- A Staff Behaviour Policy (code of conduct) which includes acceptable use of technologies, staff/pupil relationships and communications including the use of social media.
- That these policies are provided to staff during the induction process and on a risk-based approach, to volunteers and temporary staff.
- Ensuring that any deficiencies or weaknesses identified in the arrangement are remedied immediately.
- Review the Safeguarding Policy at least annually, ensure policy and procedures marry and update/remove any redundant terminology (e.g. CRB, List 99 etc...)
- Recognise and ensure the sharing of information between professionals and local agencies.
- Recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns. Opportunity should be provided for staff to contribute and shape safeguarding policies and procedures.
- Ensure appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.

- Ensure children are taught about safeguarding including online through teaching and learning opportunities.

## The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) takes lead responsibility for safeguarding and child protection. This lead responsibility should not be delegated to the deputies.

The DSL is the person responsible for maintaining an overview of safeguarding within the school, including online, opening channels of communication with local statutory agencies and monitoring the effectiveness of policy and practice.

The DSL is responsible for contacting the social services to register concern about a child's welfare and implementing procedures relating to child protection.

The DSL for the School is **Mrs Ellie Buckey**, the Deputy Head Pastoral and Head of Boarding. A separate job description can be found in Annexe G. **Dr Jayne Symons** is a DDSL but is the primary contact for all EYFS Safeguarding concerns.

There are 3 Deputy Designated Safeguarding Leads (DDSL). **Gill Iffland** (Head of Years 1 + 2), **Jayne Symons** (Head of Pre-Prep) (EYFS) and **Duncan Yates** (Assistant Housemaster). The Head, also attends regular Safeguarding training.

The DSL and DDSLs undergo inter-agency training at least every 2 years in line with guidance as well as informal updates, Prevent and inter-agency working when appropriate.

## Staff (including temporary, visiting and volunteers)

Abuse of children in attendance at school is most likely to be first noticed by teaching staff. School staff bring a number of particular advantages to the recognition of child abuse, i.e.

- They have regular and frequent opportunities to observe children, including opportunities to observe changes in their behaviour.
- They have an ongoing relationship with children, who may confide in them about difficulties they are experiencing.
- They have knowledge of the wide range of behaviour likely to be seen in children of a particular age.
- They have opportunities to observe the response of a group of children to particular situations. They will, therefore, be sensitive to surprising or unusual responses.

### ***School Staff have a professional duty to:***

- Read Part One of Keeping Children Safe in Education (KCSIE) 2021 and sign at the school office to acknowledge they have read it. School leaders and those who work directly with children should also read Annex B of the KCSIE.
- Observe and be alert to signs of abuse.
- Take immediate action in the child's best interest by reporting any suspicion or evidence of abuse or non-accidental injury to the DSL.

- Know the role of the DSL and SSCB Procedures.
- Enquire about the progress of individual cases in which they are/have been involved.
- Identify pupils who are absent for long periods and fulfil their responsibility to complete daily attendance registers.
- Be aware of the Staff Behaviour Policy (Code of Conduct). Staff should not place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parent to be conducted in view of other adults.
- Have read the Safeguarding Policy in its entirety and that they accept their duty:
  - To be familiar with this policy;
  - To implement this policy and co-operate with the school management in promoting 'Child Protection';
  - Undertake in-house safeguarding training delivered at induction and then at least annually, including training regarding Prevent/radicalisation and online safety;
  - To refresh their training wherever necessary along with reading and digesting regular updates provided by the DSL annually.

## Whistleblowing

Please see the School Whistleblowing Policy and Appendix B of this Policy for further information on allegations against adults.

## Self-Reporting

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff may also need to highlight that they meet the criteria for Disqualification by Association under the 2006 Act.

Staff have a responsibility to discuss such a situation with their line manager, the Head or a trusted colleague so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where issues raise concerns about the welfare or safety of children.

## Safer Recruitment

The School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. *(See also separate Safer Recruitment Policy)*

Part of the School's over-arching Safeguarding Policy is to ensure that all recruitment follows the safer recruitment procedures. This will be conducted by staff who have been trained in safer recruitment, this training is updated regularly.

This includes full DBS checks being conducted, references being collected prior to commencement of appointment and the correct storing of documents. The SCR is kept and updated by the Head's P.A. and is scrutinised termly by the governors.

As part of Safer Recruitment, schools must:

- Verify a candidate's identity;
- Obtain an enhanced DBS check. (Obtain a separate children's barred list check if the individual will start work in regulated activity with children before the DBS certificate is available.);
- Verify the candidate's mental and physical fitness to carry out their work responsibilities;
- Verify the person's right to work in the UK;
- If the person has lived outside of the UK, make any further checks the School deems appropriate;
- Verify professional qualifications;
- Check the person taking up a management position is not subject to a Section 128 direction made by the Secretary of State;
- Ensure that no applicant is subject to a prohibition order issued by the Secretary of State;
- Check that anyone working with children in Reception classes or wraparound care for children under 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

## **General Data Protection Regulation GDPR**

All staff should be aware of the legislation pertaining to GDPR and the Data Protection Act 2018 and KCSIE 2021. The School recognises that all relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018 and the GDPR.

Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

The School recognises that it should not under the GDPR as supplemented by the Data Protection Act 2018 provide pupils' education data where the serious harm test under that legislation is met. Guidance on recommended record keeping can be found through the NSPCC;

<https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-april-2019.pdf>

## Induction and Training

All staff and volunteers have an induction which covers Safeguarding and Child Protection from the DSL (Ellie Buckey) or an outside agency before starting work at the school. Staff members have regular training (at least every three years) and receive regular updates throughout the school year. A central record of safeguarding training is kept for all staff groups, Governors and Volunteers by Mrs Gillian Dixon, the Head's P.A.

Jayne Symons (DDSL) is a member of the school's Executive Leadership Team (ELT). Ellie Buckey is a member of the school's Senior Leadership Team (SLT). Safeguarding is a fixed agenda item on every weekly SLT meeting. Minutes are taken.

Part 1 of KCSIE (Sept 2021), is read and understood by all staff. They sign to acknowledge they have read and understood it.

Induction training ensures all staff have access to this Safeguarding Policy. Induction also alerts them to the Staff Code of Conduct (see Appendix H), Whistleblowing policy, Missing Child Policy, E-Safety Policy, Acceptable use of ICT policy and the Social Media policy. Prevent Duty training, as well as online safety training is provided regularly through Staff INSET days or online modules.

As a part of their induction process staff are also trained to manage a report of child-on-child sexual violence and sexual harassment. Staff will receive a copy of the Behaviour Policy and the Anti-bullying Policy which include information about preventing bullying.

Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

The DSL and DDSLs complete formal training updates at least every two years and more regular informal updates.

Training for the DSL and her deputies is provided through Surrey County Council (SCC) either by SSCB or by their official recommended partners. The DSL and the deputies are trained to the same level.

The training team can be contacted by email to: [ssctraining.enquiries@surreycc.gov.uk](mailto:ssctraining.enquiries@surreycc.gov.uk)

or by phone on 020 8541 9000.

Training incorporates:

- Interagency working
- Participation in child protection case conferences
- Supporting children in need
- Identifying children at risk of radicalisation
- Record keeping
- Promoting a culture of listening to children
- Prevent Duty

- Contextual Safeguarding

## Training Opportunities for Staff - General points

Never think that abuse is impossible in our School or group, or that an accusation against someone you know well and trust (including colleagues) is bound to be wrong.

The Head/ DSL will refer all allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to children's social care immediately.

Borderline cases will be discussed with the Safeguarding Partners without identifying individuals in the first instance and following discussions the Safeguarding Partners will judge whether or not an allegation or concern meet the relevant threshold. The Safeguarding Partners and the Head/DSL will decide in the circumstances what further steps should be taken. This could involve informing parents and calling the police.

If the allegation concerns a member of staff, a volunteer or another pupil he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The School will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it) or malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice.

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

During the course of the investigation the school in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Any pupils who are involved will receive appropriate care. If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff, the School will consider making a referral

to the Teaching Regulation Authority (TRA) and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

The School follows Disclosure and Barring Services (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. The School will report to the DBS, within one month of leaving the School any person (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

## **Staff contribution to and understanding of Safeguarding Policies and Procedures**

Mechanisms are in place to assist staff in understanding the School's policies and procedures including KCSIE Part 1 including Annex B (September 2021). All staff are required to sign and date to acknowledge readership and acceptance of the KCSIE and Staff Code of Conduct. Staff meetings and other staff team forums which use mechanisms such as quizzes or discussions, check understanding from staff.

Regular formal and informal staff training facilitates all staff with the opportunity to be involved in the development of policies and procedures. Feedback is sought on the success of systems for example.

## **Pupil Education**

Every effort is made to create an environment and ethos in which children feel safe and secure, their viewpoints are valued, they are encouraged to talk and they are listened to. Also, that they are taught how to keep themselves safe including online.

The School provides suitable support and guidance so that pupils have a range of appropriate adults whom they feel confident to approach if they are in difficulties, including inspectors during the course of an inspection process.

The School uses the entire school curriculum and PSHE to raise pupils' awareness and build confidence so that they have a range of contacts and strategies to ensure their own protection and understand in an age appropriate manner:

- Adjusting their behaviours to reduce risks and build resilience, including radicalisation.
- The safe use of electronic equipment and the internet; how to keep themselves safe online and when accessing remote learning.

- The risk posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise other young people especially children and vulnerable adults.

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. The School expects all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour Policy and in enforcing our Anti-Bullying Policy.

Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RS lessons are used to promote tolerance and mutual respect and understanding.

All pupils know that there are adults within the School to whom they can turn to if they are worried, including all teachers, the School Counsellor, the Independent Listener, the School's boarding staff, as well as the medical staff.

Staff treat the children with respect and all pupils are expected to treat each other and staff with respect. Our Anti-Bullying and Cyber-Bullying Policy is stored on the school system with all school policies and it acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes cyberbullying, prejudice-based, discriminatory, homophobic or gender related bullying. It is publicised on the website. It is regularly reviewed.

The School has a clear and full Behaviour Policy which is available to all staff and parents, and which is regularly re-visited by pastoral staff through the SLT.

The School looks carefully at the role models the School offers pupils through staffing, materials used, selection of curricular content and other experiences.

The School tries to impress on pupils the importance of rejecting violence or emotional abuse as a means of resolving conflict.

The School gives pupils opportunities to understand, and strategies for coping with, stress.

## **Anti-Bullying and Peer-on-Peer Abuse**

Bullying, harassment, victimisation and discrimination can appear in many forms, including: forced sexual activity (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), sexual violence and sexual harassment, upskirting, physical abuse, sexting/consensual and non-consensual sharing of nude or semi-nude images or videos, initiation/hazing type violence and rituals. These incidents can take place inside or outside school or online. Bullying will not be tolerated. Abuse is abuse and should never be tolerated or passed off as 'banter', 'boys being boys', 'just having a laugh' or 'part of growing up'. The School treats all our pupils and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. Staff are aware that boys are more likely to be perpetrators and girls more likely to be victims.

*Any* kind of bullying is unacceptable, including cyber-bullying, prejudice-based bullying, discriminatory, homophobic, biphobic and transphobic bullying. Bullying and incidents of peer on peer abuse will be treated as safeguarding issues and reported to the DSL. (See our Anti-Bullying Policy)

The School recognises that even if there are no reports made about peer-on-peer abuse, it does not mean it is not going on. The School is constantly striving to positively educate our pupils and make them pro-active in dealing with any instances of peer-on-peer abuse.

Abuse can take place within friendships or intimate personal relationships between peers.

The School recognises the gendered nature of peer-on-peer abuse and that children with Specific Educational Needs or Difficulties are more vulnerable when it comes to peer-on-peer abuse. These pupils are monitored closely by the pastoral team to make sure that a high level of support is available to them. All peer-on-peer abuse is unacceptable and will be taken seriously.

## Minimising risk

In order to minimise the risk of peer-on-peer abuse or bullying taking place in the School we:

- Encourage a close relationship between the form teacher and the pupil, so that they have a daily port of call.
- Have pastoral discussions during morning staff meetings once a week where staff can air any concerns they have about a pupil or group of pupils.
- Have a pastoral team of Heads of Year who meet weekly with the Deputy Heads to discuss any problems or concerns. In those meetings, it is outlined how support and help will be given to the pupils.
- Constantly re-enforce positive behaviour and appropriate treatment of each other in tutorials, PSHE lessons, assemblies and House groups.
- Train all staff to challenge abusive behaviour between peers.

## Response and records – including reports on sexual violence or harassment

All accusations of bullying or abuse are investigated immediately by ELT. They are assisted by the Form Teachers, Heads of Year, DSL or by the Head of Boarding. Pupils are spoken to, carefully and privately, so that staff can gather all viewpoints. Staff reassure pupils that they are being taken seriously, listened to and that they will be supported. No pupil will be made to feel ashamed or that they are causing a problem by reporting any sort of abuse. Witnesses are consulted as and when this is required. Once the most accurate version of events has been established, the outcome can be decided upon. The victim and the perpetrator will be supported throughout the process. Records are kept of all incidents and subsequent conversations using ISAMS and CPOMS. If the School feels there has been peer-on-peer abuse then a secure safeguarding folder would be created on both the victim(s) and perpetrator(s) by the DSL.

Records will include:

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

The School's approach to consensual and non-consensual sharing of nude or semi-nude images or videos: to conduct an investigation in accordance with our other safeguarding procedures. To involve the SSCB/Police.

## Physical Intervention

The School acknowledges that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be recorded and signed by a witness. For EYFS, parents and carers would be informed on the same day or as soon as reasonably possible. Staff who are likely to need to use physical intervention will be appropriately trained in the Positive Options technique. We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures. The School recognises that touch is appropriate in the context of working with children, and all staff have been given guidance to ensure they are clear about their professional boundary. *For further information, see the School's Physical Restraint Policy.*

## Use of Mobile Devices by Adults

Mobile phones and personally-owned mobile devices may not be used during lessons or formal school time. They should be switched off (or silent) at all times. The Bluetooth functionality of a mobile device should be switched off at all times and may not be used to send images or files to other mobile devices. Mobile phones and personal mobile devices are not permitted to be used in certain areas within the school site such as changing rooms and toilets.

Mobile phones and personally-owned mobile devices brought in to school are the responsibility of the device owner. The School accepts no responsibility for the loss, theft or damage of personally-owned mobile phones or mobile devices.

Regarding mobile phones or any device with a camera function, the school has a separate policy for the **Use of Images of Children at School**, which states that the school will:

*'take reasonable steps to ensure that members of staff only have access to images of pupils held by the school where it is necessary for them to do so.*

*All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Pupils, and the importance of ensuring that images of pupils are made and used responsibly, only for school purposes, and in accordance with the school's policies and the law.'*

## Early Years Specific Requirements

### Cameras

Throughout the EYFS the only cameras that may be used to photograph or video the children must be the setting's specific cameras which may only be used to take appropriate photographs or films of the children within the setting or on trips. No cameras may be used at all in any bathroom or changing facilities to protect children's privacy unless it is to evidence the children's good hand washing awareness and the child is simply washing their hands.

**Staff, students, visitors and parents** are not to use personal cameras in the setting, the only exclusion being special events such as Sports Day, Nativity or concerts when parents/ carers may use their own camera to photograph their children's participation (in such a case, Senior Leadership instruct on the importance of not sharing on social media photographs taken).

## Mobile phones

Throughout the EYFS staff and students must keep their personal mobile phones secure. It is not permitted to use the photographic function to photograph any children at any time. The only cameras permitted within the setting are the specific EYFS ones.

All staff in the Early Years Foundation Stage will be required to place their mobile devices in a storage cupboard away from the direct working area.

The only exception to this is when phones are taken by staff on trips or walks or to the outdoor woodland classroom as a matter of safety.

## Intimate Care

All children have the right to dignity and respect within their intimate care. Staff must be sensitive to their individual needs. Some children will need additional support, above and beyond age-expected development. For all tasks involving care of an intimate nature (those associated with bodily functions, products and personal hygiene) which involve contact, either direct or indirect, with sexual parts of the body. The School will:

- Ensure staff are suitably checked and that safer recruitment policies are adhered to.
- Be aware of pupil requirements.
- Involve the child as much as possible in his/her intimate care.
- Keep a record book of nappy changes.
- Ensure another staff member is present at all times.
- Ensure all staff are up to date with Safeguarding training.
- Encourage independence as much as possible.
- Note any unusual markings, discolouration or swellings and report accordingly.
- Wear disposable gloves.
- Dispose of soiled clothing or underwear appropriately.
- Put all nappy waste in the appropriate bin.
- Keep toilet areas clean.
- Promote hand-washing to a thorough level.

## Visitors' Policy: Nursery and Pre-Prep

The School welcomes visitors and operates an open-door policy. However, caution is required when permitting visitors into the School's building and grounds to protect children and staff and to avoid unnecessary disruption.

All visitors to the Nursery and Pre-Prep are advised to book in or to notify the respective department head (unless arranged with them or the class teacher) in advance to ensure a suitable member of staff is available to accompany them. All visitors who will encounter pupils as a part of their visit, including parents, guest speakers, prospective parents, parents attending their child on a 'Taster Day', professional visitors to the setting must complete a Visitors' Agreement and are required to sign in at the Main Office and to wear the printed photo identification at all times. Where regular professionals (such as the school's speech and language therapist) have been DBS checked by the school and are on the respective register, a Visitors' Agreement is not required, although they must still sign in.

The School reserves the right to refuse entry to any person, which we may have reasonable doubt of their identity. In instances where parents are separated, both custodial and non-custodial parents have the right to visit the setting, unless a court order is placed restricting such contact or accessibility. Should staff note or encounter an unfamiliar visitor on site who has not been signed in or is behaving in a suspicious manner, they must inform the School's Office.

Visitors must always be accompanied by a member of staff whilst within the Nursery or Pre-Prep. The Nursery Manager or Head of Pre-Prep should advise the visitor of all fire exits and explain there are no planned fire drills for that day.

### **Security on door and within the setting**

- Staff MUST check the identity of any visitors they do not recognise before allowing them to enter the premises.
- Passwords for collection and authorized persons to collect must be used at collection should the adult collecting the child not be well-known to staff.
- Visitors to the setting must complete a Visitors' Agreement and be signed in.
- Professionals and regular visitors must have submitted their DBS number and the date validity must be checked.
- Visitors must always be accompanied by a member of staff while in the premises.
- Parents, students, or visitors are reminded not to allow entry to any person, whether they know this person or not.
- Should staff question or have cause to question the manner or behaviours of parents/carers/adults collecting the child (e.g. suspected drinking or drugs), they are to contact one of the Safeguarding Team or a member of SLT for assistance and must hold the child in the setting.

### **Safety online**

Pupils are educated in online safety, this includes when they are learning remotely. This may be taught in weekly computing lessons, PSHE lessons as well as in other parts of the overall curriculum. The School limits the pupils' exposure to the following risks:

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

This education includes Sexting/Consensual or non-consensual sharing of nudes or semi-nudes and recognising when they are at risk i.e. when someone sends or receives a sexually explicit text, image or video on their mobile devices, usually in a text message.

The School provides an appropriate level of filters and monitoring systems to enable the pupils to minimise risk while not 'over blocking' their exposure and restricting pupil access. The School uses Smoothwall to monitor usage and catch inappropriate content. If this happens, the DSL will receive notifications and follow up with the pupils.

There is a process which is highlighted through the School's filtering system which enables us to take action to exclude devices which try to access inappropriate material. The School has a separate Bring Your Own Device (BYOD) policy to manage pupils' use of their own devices whilst in school. Staff also sign a BYOD policy to use their own device at school. The Years 6-8 pupils are issued with school devices and are required to sign an Acceptable Use of ICT Policy when they receive these devices. Pupils are not allowed to bring in mobile phones.

Please also see Pupil Acceptable Use Policy and the E-Safety Policy.

## **Private Fostering**

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

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

The School has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although the School has a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the School. However, it should be clear to the School who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. The School has a duty to inform the local authority of the private fostering arrangements.

On admission to the School, we will take steps to verify the relationship of the adults to the child who is being registered.

## Family Resilience and Safeguarding

The School recognises the changes and the implementation of the Early Help Hub which is part of the new Single Point of Access (SPA) arrangements. SPA is an umbrella term for the front door to support, information and offer advice. It is the conduit for access at levels 3 and 4 of Effective Family Resilience;

Level 1 – Universal

Level 2 – Early Help

Level 3 – Targeted Help

Level 4 – Specialist

The Early Help Hub will:

- triage the request for support.
- allocate it to the most appropriate service.
- inform the person making the request of the outcome of the request.

If a Surrey County Council Service is not appropriate the hub will endeavour to suggest alternatives. The multi-agency referral form (MARF) has been withdrawn and has been replaced with a form called 'request for support'. The School recognises that when support is requested it is implicit that the family is not being handed over but that the request is for children's services to join the existing network around the family.

The Early Help Panels are redundant as the Early Help Hub will triage and contact services direct to allocate families for support or signpost agencies and families to appropriate support. Surrey County Council commissions a wide number of voluntary and community services to provide early help.

It is recognised by the school that the Early Help Hub is to act as the pathway for a wide range of services including CAMHs and SEND.

## Children in Need

A child in need is defined as a child in need of additional support from one or more outside agencies, for example, social services, health visitors or police. Assessment of need is likely to be determined through an inter-agency assessment using local processes and consideration of the Safeguarding Partners thresholds, including use of the "Early Help Assessment (EHA)" and "Team around the Child" (TAC) approaches.

The Early Health Assessment (EHA) was previously called the Common Assessment Form (CAF).

## Early Help

Intervening to support a child before they experience problems lies at the heart of early help.

*Working Together to Safeguard Children (2018) defines Early Help as follows: “Early help means providing support as soon as a problem emerges, at any point in a child’s life, from the foundation years through to the teenage years. Providing early help is more effective than promoting the welfare of the children than reacting later”*

The School understands the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records and listening to the views of the child. Central to this is reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

**Staff who have a concern that a Child may be in need, no matter what the level of concern, should report their concerns to the DSL.** All staff should be prepared to identify children who may benefit from early help. Action should be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

Early help is underpinned by the following principles:

- **Timely intervention:** partnership resource is directed at preventing problems before they arise.
- **Integrated working:** children and young people and families receive support for all of their needs through a single offer.
- **Flexible pathway:** that recognises that children and young people will move between different levels of need as their needs and circumstances change.
- **Participation and co-design:** with children and young people and their families.
- **Early help is everyone’s responsibility:** it requires everyone to work together to put the child or young person at the centre of everything they do to meet their needs and improve outcomes.

**In order to access Early Help, you should contact the Children’s Central Point of Access (C-SPA)**

**Availability:** 9am to 5pm, Monday to Friday

**Phone:** 0300 470 9100

**Out of hours phone:** 01483 517898 to speak to our [emergency duty team](#).

**Email:** emails are dealt with during normal office hours

**For concerns for a child or young person:** [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) **For concerns for an adult:** [ascmash@surreycc.gov.uk](mailto:ascmash@surreycc.gov.uk)

Decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and the child. However, there is no suggestion that their consent is required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm. The Safeguarding Partnerships referral thresholds will be used by the DSL to assess the most suitable action in each case and determine the difference between a child in need and a child in immediate danger.

## Children Missing Education

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. As a consequence of which we have procedures in place to identify and respond to children who do go missing, particularly on repeat occasions.

The School will notify the Local Authority when removing or adding a pupil's name to the admissions register at non-standard transitions, i.e. where a compulsory school-aged child leaves before completing the school's final year or joins a school after the beginning of the school's first year.

Attendance, absence and exclusions are closely monitored. All children are included in the daily register of attendance from the beginning of their first day and attendance registers are taken twice a day (as a minimum), morning and afternoon to ensure all children are in school. The School Office always telephones a parent to ascertain the whereabouts of a pupil that has not arrived at school.

If a child has significant absence due to illness, is repeatedly absent, or is absent for more than 10 continuous school days without authorisation, the School will inform the local authority. Schools should start to complete the Children Missing Education Checklist if a pupil has had a maximum of 5 days of non-school attendance and where the school has been unable to contact the parent/carers.

The DSL will ensure that any pupil currently subject to a Child Protection Plan who is absent without explanation for two days is referred to their key worker's social care team. The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities' 2016.

The School always follows up with parents/carers when pupils are not at school. At least two up to date contacts numbers for parents/carers is required and parents are reminded to update the School as soon as possible if the numbers change.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Children are deleted from the register when the child has ceased to attend except where the pupil has died, been permanently excluded or is of no fixed abode. Before deleting a pupil's name from the attendance register on the grounds that he/she has not returned from a leave of absence exceeding ten days, both the Governors, Head and the Local Authority must have failed, after reasonable enquiry, to ascertain where the pupil is. The contact details for the CME Tracking Officer is [CME@surreycc.gov.uk](mailto:CME@surreycc.gov.uk)

*For further information, see the school's Child Missing Education Policy.*

## Elective Home Education

If a parent or carer expresses their intention to educate their child at home, the local authority, school and other key professionals should work together to coordinate a meeting with the parent/carers to make sure the child is safe and supported.

The School would refer to the guidance for local authorities on elective home education (DfE, 2019).

## Safeguarding Procedures

The School procedures for safeguarding children will be in line with Surrey Safeguarding Children Board (SSCB) procedures. The School will ensure that:

- a) All members of the governing body understand and fulfil their responsibilities, by taking advantage of the Surrey Safeguarding Procedures Manual. This can be accessed at: <http://surreyscb.procedures.org.uk/>
- b) We have designated Deputies for all safeguarding matters. The Deputies have also undertaken relevant safeguarding training. Training is kept up to date regularly and undertaken at least every 2 years.
- c) Staff are frequently reminded about the Safeguarding Policy and procedures, to allow them to develop their understanding of the signs and indicators of abuse, through staff training, updates and Staff Meetings.
- d) All members of staff, volunteers and governors know how to respond to a pupil who discloses abuse, and know that anyone can make a referral if necessary.
- e) All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the Safeguarding [Child Protection] Policy on the school website.
- f) We have clear Guidelines for outside agencies using our facilities for lettings during the holidays when pupils are not on site. Community users or any other groups organising activities for children on our site but not working with our pupils, are aware of the school's child protection guidelines and procedures.
- g) Assurance is obtained by the School that appropriate child protection checks and procedures apply to staff employed by other organisations but working with the School's pupils on other sites or in other institutions.
- h) Our selection and recruitment of staff includes checks for their suitability with the Disclosure and Barring Service.
- i) Any member of staff found not suitable to work with children will be notified to the appropriate bodies – (including the DBS and Teaching Regulation Authority) as soon as possible after leaving the School. This includes where a teacher has been dismissed or would have been dismissed had he/she not resigned, a prohibition order may be appropriate. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.
- j) Staff are reminded of their duty to disclose the relevant information related to disqualification by association.
- k) All new members of staff and governors will be given a copy of the School's Safeguarding Policy and Part 1 of the KCSIE (Keeping Children Safe in Education, September 2021), with the DSL's name clearly displayed, and access to further information to develop their understanding of Safeguarding as part of their induction into the school.
- l) All recruitment will be carried out in line with the School's Safer Recruitment Policy which details rigorous checks required including appropriate checking of references, career history and reasons for leaving previous employment. Wherever possible, applicants will

be interviewed by at least two people from ELT, one of whom will be accredited for Safer Recruitment in Education.

- m) Our policy and procedures will be reviewed annually. The DSL and DDSs will meet following the annual Governor Safeguarding Review in July and September.

## **Reporting and Referral Procedures: To be used for all Pupils and for Boarders**

The School Safeguarding Portal (CPOMS) will be used to keep an up-to-date record of all Safeguarding, Pastoral, Well-being and Mental Health concerns and issues.

Safeguarding and promoting the welfare of pupils are recognised as important issues by the School and are regularly brought up in staff meetings, boarding meetings and at other appropriate times both formally and informally.

Guidance on the best way to recognise abuse, react and deal with the issues is regularly updated and published in the Staff Handbook and in-house training. The Surrey Area Child Protection Procedure Handbook, is available on line from the Local Safeguarding Children Board: <http://surreyscb.procedures.org.uk/>

## **Safeguarding of Boarders**

### **Boarding schools, children's home and host families**

As a boarding school, Edgeborough needs to be particularly alert to children's safeguarding. There are additional requirements for boarding schools to consider with regards to safeguarding. These are set out in National Minimum Standards; the School recognises that it must comply with the relevant National Minimum Standards. The School is particularly alert to the signs of abuse in such settings and work closely with the Safeguarding partnership host and where relevant, any local authorities that have placed their children there.

### **Access to Premises**

After the end of the school day (6pm), the pupils are not granted unsupervised access to the site. They go to supper from 6-6.30pm and from there, they go to an activity (6.30-7.30pm) or come up to the Boarding House for the evening.

The barrier is put down once the day pupils have been collected and vehicles have to ring the Estates duty mobile in order to gain access to the site.

Lock up of all the buildings is conducted at approximately 8.15pm by one of the Estates Team. After this point, the boarders will all be in the Boarding House. The entry door into the House is accessed by a swipe card only. All external doors require a key or a key card.

Boarders are further protected during the night when their corridor doors are shut, these require a key card to open them as well.

The site doors all start to be re-opened by the cleaning staff in the early morning but access to the Boarding House is still restricted by the key card doors.

All of these measures are taken to prevent access being made to the premises by outsiders.

## **Supervision of staff**

If any staff are onsite during boarding time, they will be accompanied by a member of Edgeborough staff at all times and not left alone with pupils. They will be required to sign in and out as they would during the school day.

## **Guardians and Lodgings**

The School does not make any arrangements for Guardians, lodgings, adults providing lodging to pupils or host families.

## **Boarders must:**

Have space where they can have privacy.

Know who they can talk to if there is a problem.

Feel happy, relaxed and safe in their surroundings.

The School is especially alert to pupil relationships and the potential for peer abuse. Safeguarding pupils is everybody's responsibility.

The School enjoys an inclusive attitude to all aspects of our responsibility for pastoral care. As a result, we would expect that pupils and parents feel free to talk about any concerns and see the School as a safe place, if there are any difficulties at home.

The School offers pupils a range of 'listeners' to whom they may go to discuss problems or whom they may contact, including an independent listener and outside agencies. The information is published on a flyer posted in the Boarding House, in Sick Bay and throughout the School.

Key listeners are:

- Hannah Turner – School Counsellor – available in school hours on Mondays and Fridays.
- Jane Davies - External Independent School Listener. Available on request or on visiting days or via direct contact. Details are available in the Boarding House and around the School.

All pupils are encouraged to treat each other with respect, and bullying is identified as an issue to be treated seriously and dealt with efficiently, effectively, sensitively and expeditiously. It is acknowledged that serious bullying should be treated as a child protection matter when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Staff

have a duty to report any bullying incidents to the DSL (Ellie Buckey) or, if she is unavailable, to the Head or a DDSL. It is the responsibility of DSL or DDSLs to make the decision to report concerns to the proper authorities.

The School seeks to promote an atmosphere in which there is mutual respect between staff and pupils. Pupils will not be punished within the School by any form of physical punishment (hitting, slapping, shaking) or other degrading treatment.

The School recognises that children who have suffered or are at risk of suffering serious harm should be reported immediately to Children's Social Care but that there may be cases where children may need support through an inter-agency assessment.

This might include a co-ordinated offer of early help such as through the 'Multi Agency Partnership' (MAP) and 'Effective Family Resilience' model.

## **Referral procedure guiding principles**

It is important the child receives the right help at the right time to address risks and prevent issues escalating. A member of staff only requires reasonable cause for concern regarding potential child abuse in order to act.

### **Key Points in dealing with a disclosure are outlined in Appendix D**

- It is important to act on and refer early signs of abuse, neglect or radicalisation
- Keep clear records
- Listen to the views of the child.
- Reassure if the situation does not improve.
- Share the information quickly.
- Challenge any inaction.

### **In dealing with pupil disclosures, staff must:**

- Remember that the priority is to protect the child.
- Staff and pupils reporting will be protected against retribution.
- Treat the matter seriously – research has shown that children are very unlikely to fabricate allegations of sexual abuse.
- Receive the child's story and remain calm and reassuring without making promises about confidentiality, listen but do not judge – children who have suffered abuse may have low self-esteem and may withdraw if they detect signs of doubt or revulsion.
- React to what the child tells you with belief and tell the child that they have done the right thing in telling you.
- Indicate to the child what action you will take and make it clear that you will have to inform others (no secrets). Only inform those with a need to know.
- Keep an accurate record of what you have become aware of and what you have done.
- Limit any questioning bearing in mind the 'must not' points below.
- If a crime has been committed (including FGM), this must be reported to the police within 24 hours. The staff member can be supported by a member of the safeguarding team in this process.

### **Staff must not:**

- Contact the parents – this is the job of the social services.
- Make the child feel that they are creating a problem by reporting abuse.
- Make a child feel ashamed of making a report.
- Interrogate the child if that child has disclosed information or ask leading questions.
- Attempt to investigate the allegations of abuse.
- Speak to anyone about whom allegations are made (including colleagues).
- Promise to keep secrets/confidentiality.
- Ask a child outright if they or others have suffered abuse.

## Method for reporting concerns to the DSL

When adults at the School have a concern about a child or young person they should:

- Complete a concern form in writing or make an entry in the electronic recording system as soon as possible.
- Concern Forms can be found on staff Safeguarding Boards in Pre-Prep, the staff room, the Estates office and the Catering corridor. Digital copies are kept on the R-Drive in the Safeguarding and Child Protection folder, also on Teams in the Edgeborough Staff Room team.
- The DSL should be informed that a concern has been raised [via email or in person].
- The DSL will then decide what sort of early help, pastoral support or liaison with multi-agency services is necessary.
- If for any reason, the staff member cannot find the DSL/DDSL and they think the child is at risk of immediate harm, that staff member should call the police on 999.
- Anybody can make a referral to Social Services or the police if they think a child is at risk. This can be done without parental consent.

## Further guidance for staff

- Whenever there is an incident, consult the policy as soon as is possible, to ensure that your procedure is correct.
- Always stop and listen immediately to someone who wants to tell you about incidents or suspicions of abuse. Give the child time to talk.
- Write brief notes of what you are being told (as they speak if possible). You may need to refer to them at a later date, however rough they may be. The original may be more relevant than a tidied up document. If you cannot make notes at the time, do so as soon as possible afterwards. **USE THE LANGUAGE OF THE PERSON SPEAKING. DO NOT INTERPRET.**
- Do not give a guarantee that what you are told will be confidential. Explain that you may have to tell someone, but only to help sort out the problem and that you will only tell someone who absolutely needs to know, so that the appropriate procedures can be followed.
- Do not ask leading questions or probe. Use questions such as: "What do you want to tell me?" or "Is there anything else you want to say?" Do not let your personal feelings show. Investigation is NOT your responsibility.

- Immediately tell the DSL (Ellie Buckey), unless she is the suspected abuser, in which case you should tell the Head. Should the allegation be against the Head the DSL will immediately inform the Chair of Governors without the Head being informed first.
- Do not discuss the matter with other pupils or members of staff, or any other adults. The DSL will support you in making a referral to Children's Social Care.
- Discuss with the person in charge whether any steps need to be taken to protect the child who has told you of the abuse.

## Staff behaviour and Staff Code of Conduct

In general, pupils should be encouraged to discuss with their parents or guardians issues that are troubling them. It may be appropriate to suggest that a pupil sees an appropriate member of staff as outlined above. Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. They need to treat all pupils with respect and try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint. Staff should avoid taking one pupil on his/her own in a car.

All Staff are also given advice on:

- One to One Situations
- Transporting Children
- Pupils in Distress
- Physical Contact – Also see Sun Cream Policy / Policy on Physical restraint
- Social Contact
- Infatuations
- Care, Control and Physical Intervention
- Photography, Videos and other Creative Arts
- Use of ICT Policy - password safety, visiting sites

*See also the full Staff Code of Conduct in Appendix H.*

## Parents

In general, we believe that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Head who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from children's social care.

## Appendix A: Supplementary information on types and signs of abuse

All definitions as notated in quotation marks, are taken from (Keeping Children Safe in Education 2021 including Annex A)

### Abuse:

*“a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.”*

- Physical Abuse (including self-harming)
- Emotional Abuse (including mental health, body image and stress)
- Sexual Abuse
  - By adults
  - By Other young people
  - Child Sexual Exploitation
- Neglect
- Peer on peer abuse
- Domestic Abuse
- Honor Based Violence (HBV):
  - Forced Marriage
  - Female Genital Mutilation (FGM)

These different types of abuse require different approaches. A child suffering from physical abuse may be in immediate and serious danger. Action should, therefore, be taken immediately. With other forms of abuse there is a need to ensure that adequate information is gathered. There is also a need to make sure that grounds for suspicion have been adequately investigated and recorded. The need to collate information must be balanced against the need for urgent action. If there are reasonable grounds for suspicion then a decision to monitor the situation should only be taken after consultation. A situation that should cause particular concern is that of a child who fails to thrive without any obvious reason. In such a situation a medical investigation will be required to consider the causes.

### Sexual Abuse by young people:

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

### Developmental Sexual Activity:

This encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

The School PSHE Curriculum reflects the requirements for Relationship Education, Sex Education and health education.

### **Inappropriate Sexual Behaviour:**

This can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society’s standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available through the Safeguarding Partnership protocol “Working with Sexually Active Young People” available at [www.surreycc.gov.uk/safeguarding](http://www.surreycc.gov.uk/safeguarding), by choosing Safeguarding Children – Protocols and Guidance for Professionals. Assessment, Consultation and Therapy (ACT) 01306 745310 can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

Where an incident comes to light which includes sexual violence and sexual harassment, the DfE guidance should be followed. (Sexual violence and sexual harassment between children in schools and colleges DfE Dec 2021) If a child has been harmed, is in immediate danger, or is at risk of harm a referral should be made to the MASH (social care) or the police. The DSL will need to undertake a risk and needs assessment considering the victim, the alleged perpetrator, and other children or staff at the school or college, and take action accordingly.

### **Child Sexual Exploitation:**

*“A form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. It does not always involve physical contact and can happen online. A significant number of children go missing from the care and education.”*

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

Signs include:

- going missing from home or school
- regular school absence/truancy
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress

- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

### **Exploitation of Children including County Lines**

The term county lines refers to urban gangs supplying drugs to suburban areas, as well as market and coastal towns, by using dedicated mobile phone lines or “deal lines”. Gangs use children and vulnerable people to move drugs and money to these areas. Once caught up in county lines, exploited individuals are at risk of extreme physical and/or sexual violence, gang recriminations and trafficking.

As part of the Serious Violence Strategy, the Home Office is helping to raise awareness of county lines among frontline staff. This includes teachers, health workers and those who work in the transport, housing and security sectors. These people are most likely to encounter individuals at risk.

This will help staff spot potential victims and report concerns to the DSL as per the Safeguarding Policy.

### **Voyeurism**

The School recognises changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

### **Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. The following risk factors have been proved to increase the likelihood of involvement in serious violence:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery.

Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

### **Youth produced sexual imagery (sexting)/Consensual and non-consensual sharing of nudes and semi-nude images/videos:**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_S\\_P\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_S_P_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent
- The imagery involves sexual acts

- The imagery involves anyone aged 12 or under
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming

If none of the above applies then the Head, after discussion with the DSL, will use his professional judgement to assess the risk to pupils involved and may decide, to respond to the incident without escalation to Children's Social Care or the police.

In applying judgement the DSL will consider if:

- There is a significant age difference between the sender/receiver
- there is any coercion or encouragement beyond the sender/receiver
- the imagery was shared and received with the knowledge of the child in the imagery
- the child is more vulnerable than usual i.e. at risk
- there is a significant impact on the children involved
- the image is of a severe or extreme nature
- the child involved understands consent
- the situation is isolated or if the image been more widely distributed
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances
- the children have been involved in incidents relating to youth produced imagery before.
- If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the school
- The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures

### **Domestic Abuse/Domestic Violence (DV):**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

The School uses the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self-harm and anxiety.

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to

domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

### **‘So-Called’ Honour Based Violence (HBV):**

This encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation, Forced Marriage or breast ironing. All forms of HBV are abuse and should be handled and escalated as such.

HBV can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

### **Forced Marriage (FM):**

*“A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.”*

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party. Always call either the Contact Centre or the Forced Marriage Unit 020 7008 0151.

### **Female Genital Mutilation (FGM):**

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

#### 4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

FGM is carried out because:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

### **The 'One Chance' rule:**

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action **without delay**. All staff have a legal obligation to report to the police if they discover that an act of FGM appears to have been carried out on a girl under 18.

### **The Symptoms of Stress and Distress:**

When a child is suffering from any one or more of the previous four 'categories of abuse', he/she will nearly always suffer from/display signs of stress and distress. An abused child is likely to show signs of stress and distress as listed below:

- A lack of concentration and a fall-off in school performance
- Aggressive or hostile behaviour
- Moodiness, depression, irritability, listlessness, fearfulness, tiredness, temper tantrums, short concentration span, acting withdrawn or crying at minor occurrences
- Difficulties in relationships with peers
- Regression to more immature forms of behaviour, e.g. thumb sucking, bed-wetting (or its persistence)
- Self harming or suicidal behaviour
- Negative body image
- Low self esteem
- Wariness, insecurity, running away or truancy – children who persistently run away from home may be escaping from sexual/physical abuse
- Disturbed sleep
- General personality changes such as unacceptable behaviour or severe attention seeking behaviour
- A sudden change in school performance

### **Parental Signs of Child Abuse:**

Particular forms of parental behaviour that could raise or reinforce concerns are:

- Implausible explanations of injuries
- Unwillingness to seek appropriate medical treatment for injuries
- Injured child kept away from school until injuries have healed without adequate reason
- A high level of expressed hostility to the child
- Grossly unrealistic assumptions about child development
- General dislike of child-like behaviour
- Inappropriate labelling of child's behaviour as bad or naughty
- Leaving children unsupervised when they are too young to be left unattended

### **Indicators of Vulnerability to Radicalisation:**

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as ‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.’ We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities and can seek support from the DSL on such matters.

6. Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

Agencies that can help with PREVENT.

Call the Police confidentially on 101

Surrey Safeguarding Partnership

If you see something, say something – 0800 789 321

## Appendix B: Procedure for Staff Facing Allegations of Abuse

### INTRODUCTION

This procedure should be used in respect of all cases in which it is alleged that a teacher, member of staff (including volunteers and supply staff) or contractor has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates that he or she may pose a risk of harm to children.
- Behaved in a way that indicates that they may not be suitable to work with children (this includes behaviour that may have happened outside the school – this is known as a transferrable risk).

Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.

Allegations against a teacher who is no longer teaching should be referred to the police. Allegations that a member of staff has abused a pupil or pupils either inside the school premises or during a school trip or visit could be made by:

- Parents
- The abused pupil
- Other members of staff
- Other pupils
- The Police or Social Services
- A third party

An allegation of such seriousness would normally be made immediately and directly to the Head; but if another member of staff is told first, he/she must ensure that the Head is informed immediately. The School's Whistleblowing Policy aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. A copy of the policy is available on the R-Drive in the policies folder.

If the Head is unavailable, the Chair of Governors should be told at once, usually through the DSL. If there would be a conflict of interest reporting to the Head, the LADO should be contacted directly.

Such allegations are among the most testing issues that any Head or Chair of Governors is likely to face and these procedures have been established to meet the need to handle such a situation as sensitively and efficiently as possible. Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

In all cases, the quick resolution of any allegation against a member of staff will be a clear priority to all concerned and all unnecessary delays will be eradicated.

These procedures are reviewed on an annual basis by the Governing Body.

## **ALLEGATIONS INVOLVING THE HEAD OR DSL**

In the case of suspected or identified abuse of a child by the Head, the police and/or Social Services have a duty to investigate.

The first person to receive an allegation regarding the Head should take it directly to the Chair of Governors or, if she is not available, the Safeguarding Governor. At this stage, after hearing a child's allegation, no discussion about the allegation should be initiated by School staff with the Head.

The Chair of Governors will obtain legal advice before proceeding to the steps outlined below. The Head will normally be suspended for the duration of the investigatory process and asked to vacate his/her school residence, and the Senior Deputy will be made acting Head until the conclusion of the investigation and resolution of the issue.

The Head should similarly be told at once of any allegation involving the DSL. The Chair of Governors should normally be informed on the same day, and legal advice obtained. The DSL will normally be suspended for the duration of the investigatory process and asked to vacate his/her school house where appropriate. The Head will be made acting DSL until the conclusion of the investigation and resolution of the issue.

## **ANONYMOUS ALLEGATIONS**

If the Head receives an anonymous allegation of child abuse which names both a member of staff and a child, it will be handled in exactly the same way as if the identity of the person making the allegation was known. Where the allegation names the member of staff but not the pupil, the Head will normally interview the member of staff, and ask for his or her version of events. It could be appropriate to establish a mentoring or review programme for that individual, or to provide him or her with further training. A record would be kept on the individual's personal file.

## **THE FIRST RESPONSE**

### **If the harms test is met, allegations would be addressed as follows.**

If an allegation is raised against a member of staff or the Head, the Surrey Safeguarding Children Board (SSCB) Procedures must be followed. A full copy of the SSCB Procedures Manual is available via their website: <http://surreyscb.procedures.org.uk/>

The School will respond promptly and sensitively to the legitimate concerns of the victim and his or her family. The School will undertake to:

- Take any allegation of abuse, involving a member of staff, very seriously
- Establish the facts before jumping to any conclusion
- Discuss the allegation with the LADO, see Appendix F for contact details. It may be necessary at this point to involve and consult with the police or children's social care services
- The School Bursar must be informed, if after the initial enquiry, there might be the need for a formal investigation and the school's insurers must be informed

## THE NEXT STEP

Although a formal investigation is a matter for specialists, where the facts suggest that there may be reasonable grounds for suspecting actual abuse, or grooming of a child, or other criminal behaviour, we will always respond to advice from the LADO which may include:

- Invite the police to conduct the investigation
- Consider suspending the member of staff (or volunteer) concerned. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the pupils or pupil concerned and the need for a full and fair investigation.
- Inform the member of staff concerned honestly of the allegation that has been made, unless advised not to by the police or social services. The School recognises the duty of care to employees and will provide effective support for anyone facing an allegation. Staff who are the subject of an allegation of this nature will invariably feel threatened and isolated we will advise him or her to contact their Trade Union or Professional Association for advice and support.
- Inform the child's parents or carers in confidence, inviting them to maintain confidentiality whilst the investigation takes place, unless the allegation involves the parents, in which case we will contact the Social Services before making contact. Parents or carers should be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002. If they wish to have reporting restrictions removed they should seek legal advice.

## SUPPORT FOR THE PUPIL

The School's priority is to safeguard the young people in our care. We will give all the support that we can to a pupil who has been abused. The Head, together with the School's DSL, will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, guardians, SSCB or other agencies involved to identify the support strategies that will be appropriate.

## SUSPENSION

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Suspension is not the default position and will be used only when there is no reasonable alternative. It is a serious step, and the School will take legal advice as well as advice from the LADO beforehand, and will normally only suspend a member of staff where:

- There is cause to suspect that there is a serious risk of harm to the child
- The allegations are so serious as to constitute grounds for dismissal, if proven
- The police are investigating allegations of criminal misconduct

The School recognises fully that we have a duty of care towards all of our staff, and will always:

- Keep an open mind until a conclusion has been reached
- Interview a member of staff before suspending him or her

- Keep him or her informed of progress of the investigation

Any member of staff is entitled to be accompanied by a friend or Trade Union representative.

In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School, it will be necessary to immediately suspend that person from teaching pending the findings of the TRA's investigation.

## **ALTERNATIVES TO SUSPENSION**

The School will always consider whether an alternative to suspension might be appropriate. Possibilities include:

- Giving him or her non-direct contact duties with the child or children concerned
- Ensuring that a second adult is always present in the classroom when the member of staff has contact with children.
- Sending the member of staff on leave
- Moving the child or children to alternative adult supervision, e.g. where the member of staff is a teacher, moving the child to an alternative class making sure that it is clear that this is not a punishment and parents have been consulted

## **IF THE MEMBER OF STAFF RESIGNS**

The resignation of a member of staff or volunteer mid-way through an investigation would not lead to the investigation being abandoned. The School will always complete every investigation into allegations of child abuse.

## **COMPROMISE AGREEMENTS**

The School's policy is to follow the DfE guidance set out in "Keeping Children Safe in Education" September 2021 on the use of compromise agreements in cases of child abuse which is:

*"Compromise agreements, by which a person agrees to resign, and a school.. ... agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, must not be used in these cases. In any case, such an agreement will not prevent a thorough police investigation where that is appropriate. Nor can it override the statutory duty to make a referral to the DBS where circumstances require it"*

A compromise agreement can also not override any duty to make a referral to the TRA as detailed in the Introduction section of the main Safeguarding [Child Protection] Policy

## **LENGTH OF INVESTIGATORY PROCESS**

It is in everyone's interests that the School completes any investigatory process as quickly as possible, consistent with a fair and thorough investigation. It is the aim that almost every case is completed

within one month without compromising on the fair and impartial processes of the investigatory process.

For cases where it is immediately clear that the allegation is unsubstantiated or malicious, it is the aim to resolve the case within 5 working days. If the nature of the allegation does not require formal disciplinary action, action should be should taken within 3 working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

## **DETERMINING THE OUTCOME OF ALLEGATION INVESTIGATIONS**

The following definitions will be used:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there have been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

## **RECORDING ALLEGATIONS OF ABUSE**

All allegations of abuse will be recorded together with subsequent actions, including any disciplinary actions.

## **HANDLING UNSUBSTANTIATED OR MALICIOUS ALLEGATIONS**

The Child: A child who has been the centre of malicious or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. The School will liaise closely with the LADO and SSCB to set up a professional programme that best meets his or her needs, which may involve the Adolescent Mental Health Services and an Educational Psychologist, as well as support from a Counsellor. The School will be mindful of the possibility that the allegation of abuse was an act of displacement, masking abuse that is actually occurring within the child's own family and/or community.

However, much support the child may need in such circumstances, the School needs to be sensitive to the possibility that the aftermath of a malicious or unsubstantiated allegation of abuse may result in the irretrievable breakdown of the relationship with the teacher. In such circumstances, the School may conclude that it is in the child's best interests to move to another school. The School would do our best to help her/him to achieve as smooth a transition as possible, working closely with the parents or guardians.

If an allegation against a member of staff is found to be malicious, the pupil involved is likely to have breached school behaviour policies and may be subject to appropriate disciplinary sanctions, as well as possible referral to the police if there are grounds to believe that a criminal offence may have been committed.

The Member of Staff

- A member of staff could be left at the end of a malicious or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun him/her on the grounds of “no smoke without fire”. If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised; the School recognises that he or she is likely to need both professional and emotional help. The School will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the school community. A short sabbatical or period of re-training may be appropriate. Support will be provided for the return to work.
- Allegations found to have been malicious or false will be removed from personnel records and any that are unsubstantiated, false or malicious will not be referred to in employer references.

### **ALLEGATION OF ABUSE OF A CHILD WHO IS NOT A PUPIL AT THE SCHOOL**

If the School were given information that suggested that a member of staff was abusing a child who was not a pupil at the School, we would immediately pass such information to SSCB to handle. The School would then interview the member of staff and formally advise him/her of the allegations, making it clear that the School would not play any part in the investigatory process. He or she would be advised of the possibility of facing suspension, for example, re-assignment to other duties, in exactly the same way as if the allegation had involved a school pupil. If the allegation subsequently proved to be unfounded, he or she would be given full support by the School in resuming his/her career.

### **ON CONCLUSION OF AN ALLEGATION OF ABUSE**

- If the allegation is substantiated, the Head will work with the LADO to decide whether to make a referral to the DBS and for teaching staff to the TRA.
- If there is sufficient concern that an individual has engaged in conduct that harmed, or is likely to harm, a child, or if they otherwise pose a risk of harm to a child, a referral will be made to the DBS.
- Parents will be kept informed about the progress of a case and told the outcome where there is not a criminal prosecution and where possible, being invited to maintain confidentiality.

The Head will review the circumstances of the case to determine whether any improvements can be made to the school’s procedures or practice to help prevent similar events in the future.

### **REFERRAL TO THE DISCLOSURE AND BARRING SERVICE**

The School recognises the statutory legal duty to refer an individual, where they have harmed, are likely to harm, or otherwise pose a risk of harm to a child, or have committed one of a number of listed offences, to the Disclosure and Barring Service (DBS) as soon as possible after the individual’s dismissal or resignation from a regulated activity.

In borderline cases, the DSL will discuss doubts and concerns with the LADO, tentatively, and without giving names in the first instance.

Reports concerning members of staff or volunteers are normally made by the DSL. If the DSL is involved, the report is made by the Head. If the Head is involved, the report is made by the Chair of Governors.

The referral form can be downloaded from the DBS website on ([www.homeoffice.gov.uk/agencies-public-bodies/dbs](http://www.homeoffice.gov.uk/agencies-public-bodies/dbs)). The School plays no part in the subsequent process of barring individuals from working with children and/or vulnerable adults. The School also has a legal duty to respond to any requests for information that it receives from the DBS at any time.

## Low-level concerns

Concerns that do not meet the harm threshold will be dealt with in school. A low-level concern is anything that suggests a member of staff has behaved in a manner that is inconsistent with the staff code of conduct.

This could include (but is not exclusive):

- Being over-friendly with children
- Having favourites
- Using inappropriate, offensive or sexualised language
- Engaging with a child on a one-to-one basis in a secluded area.

All staff must be confident to share a low-level concern, even if it is only a nagging doubt, with the Head, DSL (if the concern is about safeguarding) or Chair of Governors as soon as they can. This will create an atmosphere of transparency and help to address inappropriate behaviour as quickly as possible.

Once the concern has been reported, the Head (or other appropriate staff member), will gather as much information as possible, by speaking to the person who raised the concern, the individual involved and to any witnesses.

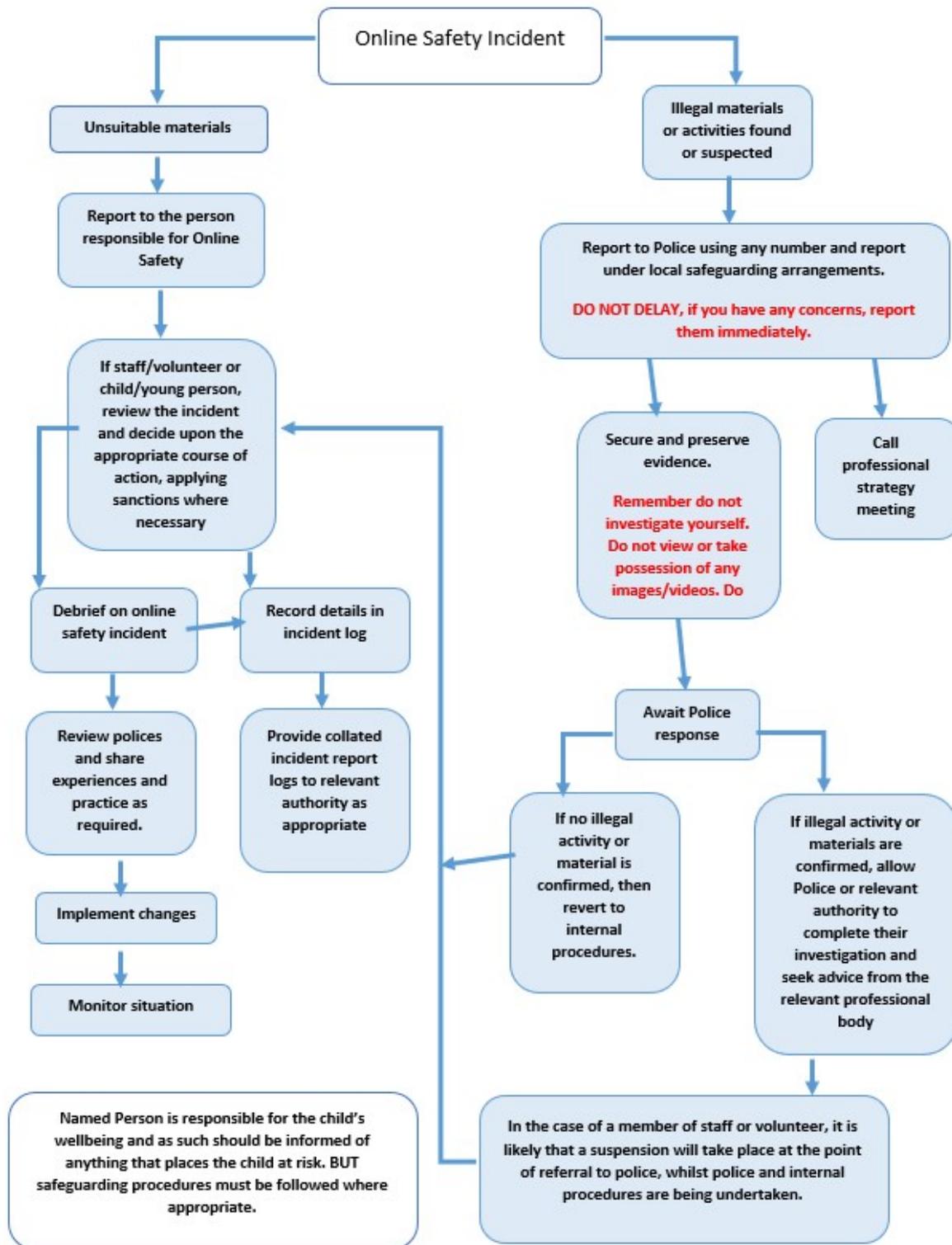
Reports about supply or contracting staff should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

**Recording:** All low-level concerns should be recorded by the DSL. These records must be kept confidential. Records will contain the details of the concern, the context in which it arose and action taken. The name of the reporting person will be recorded. If they wish to remain anonymous, this wish will be respected as far as is reasonable possible.

Records should be reviewed so that any patterns of inappropriate behaviour could be spotted and reported to the LADO at a later date if necessary. The rationale for all decisions and actions taken must be recorded.

The School must consider if there are any wider cultural issues in the school that have allowed the behaviour to occur to allow for further training/policy changes to minimise the risk of recurrence.

## Appendix C: What to do if you have an online safety concern



## Appendix D: Key points to follow if you suspect or are told of abuse

Please refer to the full Safeguarding [Child Protection] Policy document for more detail on the Reporting Procedure. What follows is a very much condensed version of key actions.

**Remember – it could happen here. If in doubt speak to the DSL (Ellie Buckey) or DDSLs (Jayne Symons, Gill Iffland or Duncan Yates)**

Adults looking after children or young people must be aware of the risk of abuse by adults or other young people. Child abuse can occur in all walks of life and the School should not be considered in some way immune. All staff should know what to do if they suspect abuse or are told of abuse. All staff must act if there is reasonable cause for concern.

At the School we believe that all pupils have the right to be safeguarded from harm and exploitation.

1. **The priority is always to protect the child.**
2. **ALWAYS stop and listen** straightaway to someone who wants to tell you about incidents or suspicions of abuse. Treat it seriously. A voluntary disclosure from a pupil is nearly always of significance.
3. **Believe, remain calm and reassuring, and do not judge.**
4. **Keep accurate records**, keep all original notes however rough they are.
  - a. Records must be factually accurate as may be used later in court.
  - b. The pupil's own words must be recorded, not your version.
  - c. Do not embellish or speculate. Clearly state if reporting your view interpretation of their state of mind.
  - d. All notes must be signed, dated and timed. A form is provided.
5. **DO NOT guarantee confidentiality.**  
Explain that you will pass the matter on to the DSL (Ellie Buckey) in order to keep them safe. Reassure that only those needing to know will be informed.
6. **DO NOT ask leading questions**  
such as: did he/she do X to you? Keep your questions open (is there anything else you want to tell me?) and do not interrogate. Neither you nor the DSL is qualified to investigate allegations. Leading questions may jeopardise or compromise possible criminal procedures.
7. **IMMEDIATELY tell the DSL** and pass on your notes as soon as possible. The DSL will refer the matter to the Social Services (and possibly the Police) within 24 hours.
8. **NEVER think abuse is impossible** in the school or that an allegation against someone you know well and trust is bound to be wrong.

## Appendix E: Cause for concern forms and body maps

Student name:	Class/ Year group:	SEN/LAC/CP/CiN/TAF/ other (Safeguarding team to complete)
Other persons present (if applicable):		

For any sections below continue recording on an additional sheet if necessary, ensuring it is signed and dated.

### Report

Reported by:	Date of incident: DD/MM/YYYY	Time of incident / concern / disclosure:
Role in School:	Date of concern / disclosure: DD/MM/YYYY	

Provide details of the incident or concerns you have including the wording used by the child, location, description of any injuries (use body map if you have seen the injury), child's demeanour, times, dates, your observations, whether the information is first hand / fact / opinion, and any other relevant details / information, etc. Ensure you clearly record the voice of the child (e.g. use capital letters to denote child's language for ease of recognition).

Staff name:	Signature:	Date DD/MM/YYYY / and time of report:
-------------	------------	---------------------------------------

### DSL response - Agreed actions and outcomes

Include notes from discussions with agencies/ parents etc. and referrals, as well as the decisions made. Ensure you provide reasons for these decisions.

DSL name(s):	Signature:	Date: DD/MM/YYYY

**Body Maps – Only to be used if you have SEEN the injury. Do not ask a child to show you an injury.**

Child's name:

Date of birth:

**Date/time of skin markings/ injuries observed:**

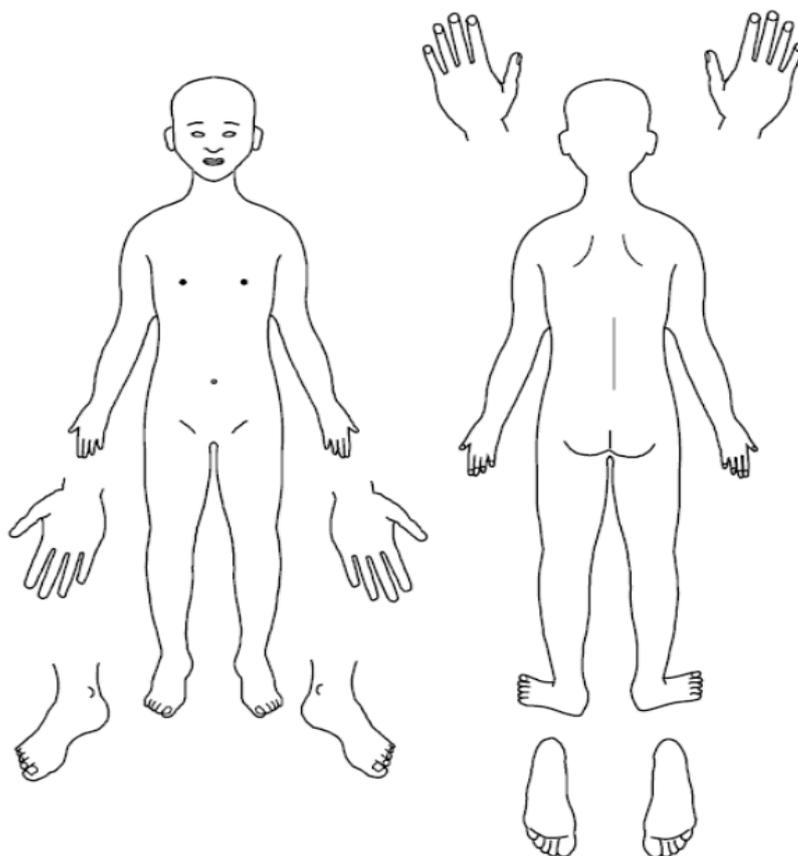
**Who injuries observed by:**

**Information recorded:**

Date:                      Time:

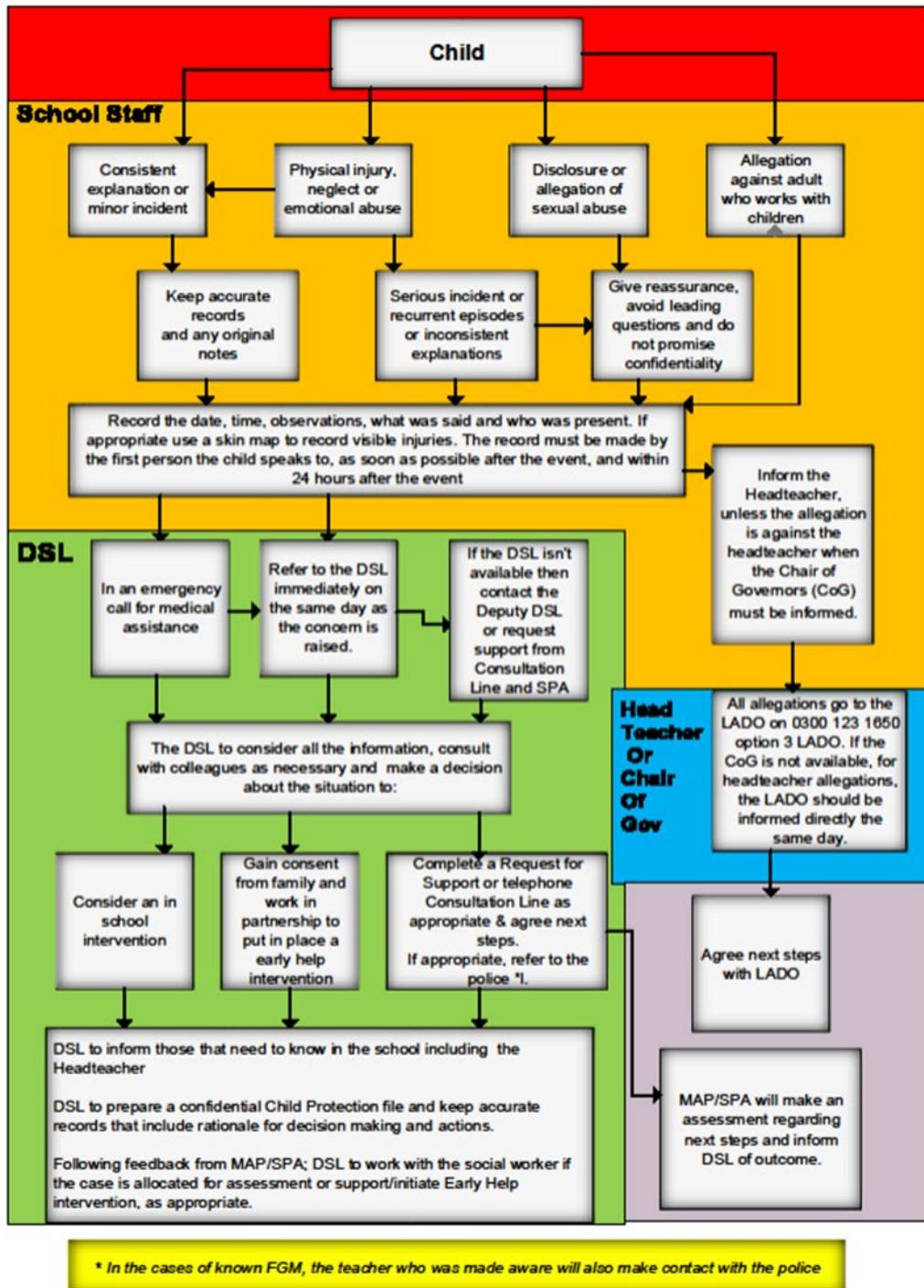
Name:

Signature:



## Appendix F: Child Protection Procedures Flowchart

### Child Protection Procedures Flowchart



## Appendix G: Role of the Designated Safeguarding Lead (DSL)

Governing bodies, proprietors and management committees appoint an appropriate **senior member** of staff, from the school or college **leadership team**, to the role of Designated Safeguarding Lead. The Designated Safeguarding Lead takes **lead responsibility** for safeguarding and child protection. This is explicit in the role-holder's job description. The safeguarding team includes at least one member of the Senior Leadership Team and has the appropriate status and authority within the school to carry out the duties of the post. The DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter- agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the Designated Safeguarding Lead; this **lead responsibility** should not be delegated.

The DSL is also responsible for Online Safety. The DSL heads up the group 'The Online Safety Working Group' at Edgeborough to further develop and enhance the school's online safety profile.

### Manage referrals

The DSL will:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- Refer cases where a crime may have been committed to the Police as required.

### Work with others

- Liaise with the Head to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Work closely with the Senior Management team and the ICT team in order to promote and maintain the online safety of the pupils.

## **Undertake training**

The DSL (and any deputies) undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years.

The DSL has had Prevent awareness training.

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

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

## **Raise Awareness**

- The DSL ensures the school or college's child protection policies are known, understood and used appropriately;
- Ensure the School's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;

- Ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- Link with the local safeguarding partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

### **Child protection file**

- Where children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

The school's records on child protection are kept locked in the DSL's office, and are separated from routine pupil records. Current cases are kept locked in the DSL's office and access is restricted to the DSL, DDSLs and the Head.

### **Availability**

- During term time the DSL (or a deputy) is always available (during school or college hours) for staff in the School to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the DSL, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such mediums is acceptable.
- It is a matter for individual schools and colleges and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

## **Appendix H: Staff Code of Conduct**

### **Introduction**

This document provides instruction for adults working at Edgeborough School (including staff, governors and volunteers) about acceptable and desirable conduct to **safeguard** both adults and pupils. It refers to and complements the other policies that staff members are required to adhere to, including:

- Safeguarding Policy
- Whistle Blowing policy
- Health and Safety policy
- E-safety/ICT acceptable use policies
- Anti-bullying policy
- Behaviour and discipline policy
- Social Media policy

In addition all staff must read Part 1 of *Keeping Children Safe in Education*, September 2021 and must adhere to all other documents of employment.

Always remember that while you are caring for other people's children, you are in a position of **trust** and your responsibilities to them and the organisation must be uppermost in your mind at all times. The child's welfare is paramount (Children Act 1989). You are also representing the school and are expected to promote the school's interests and protect its reputation at all times.

**Do not:**

- Discriminate favourably or unfavourably towards any pupils.
- Use or threaten any kind of physical punishment.
- Disclose confidential information belonging to the school to any person not authorised to receive it. Also ensure that any confidential or sensitive information is not left in an inappropriate place e.g. the photocopier.
- Leave your computer unattended without locking the screen first. Ensure the overhead projector is turned off when viewing sensitive material e.g. emails.
- Tell anyone your password or login information.
- Smoke or vape in front of any pupil.
- Accept 'friend' requests on Facebook from pupils (or past pupils) under the age of 18, or communicate with pupils via any type of social media.
- Be under the influence of alcohol or any other substance which may affect your ability to care for children or carry out your role within the school.
- Keep medication somewhere pupils could access it. Staff medication on the school premises must be out of reach of children at all times and should be stored securely in either a locker or the Matron's office.
- Behave in a way that may frighten or demean any pupil.
- Use any racist, sexist, discriminatory or offensive language to anyone in the Edgeborough community.
- Allow personal or political views to influence your professional conduct or conversation with pupils.

- Use equipment belonging to the school to access any form of pornography. Neither should these images be brought into the workplace.
- Invite a pupil into your home/car or arrange to see them outside school hours without express permission of parents.
- Engage in any sexual activity (this would include using sexualised language) with a pupil you meet through your duties or start a personal relationship with them – this would be **an abuse of trust. This includes anybody in the Community under the age of 18.**
- Let allegations made by a pupil go unchallenged, unrecorded or not acted upon. All Safeguarding concerns must be reported to the Designated Safeguarding Lead, Ellie Buckey or one of the Deputy DSLs.
- Rely upon *good nature* to protect you or believe “it could never happen to me.” (Never put yourself in a position that could be misinterpreted)
- Give pupils presents or personal items (unless an item given in your professional capacity, e.g. the custom of giving an end of year present).
- Take photographs or videos of children on personal devices without first referring to our E-Safety Policy. You may use your own device for photographs of pupils, as long as you send these images to the Marketing Phone or upload them to the school system. You must delete them before you leave school for the day. You must not use your own device for photos of EYFS children.
- Put images of pupils onto personal social media sites, unless it is part of your role in the school to do so.

**Do:**

- Be familiar with and work in accordance with the school’s policies, particularly those mentioned above.
- Remember that any data you produce about a child, parent or member of staff can be viewed on request; this is in accordance with data protection laws.
- Provide a good example and be a positive role model to pupils. This includes appropriate dress, language and manners.
- Ensure that your relationship with pupils remains on a professional footing.
- Behave in a mature, respectful, safe, fair and considered manner.
- Ensure risk assessments are completed when transporting pupils. Also ensure that you have correct parental permissions and adult/pupil ratios, and that all children wear seatbelts or use car seats (when applicable).
- Ensure any visiting speakers are vetted using the correct forms. These should also be used when you lead a school trip that involves someone speaking to the children.
- Ensure that no guest or visiting speaker is given unsupervised access to the children. Ensure you follow the protocol for visitors to the school.
- Exercise caution about being alone with a pupil. In situations where this is unavoidable, ensure another colleague or volunteer knows what you are doing and where you are.
- Treat children with respect and dignity, even in those circumstances where they display difficult or challenging behaviour

- Ensure that any physical contact is open and initiated by the child's needs, e.g. for a hug when upset or help with toileting. Always prompt pupils to carry out personal care themselves and if they cannot manage, ask if they would like help.
- Talk to pupils about their right to be kept safe from harm.
- Listen to pupils (be approachable) and take every opportunity to raise their self-esteem.
- Work as a team with your colleagues / volunteers. Agree with them what behaviour you expect from the pupils and be **consistent** in enforcing it.
- Remember that if you have to speak to a pupil about their behaviour, you are challenging 'what they did', not 'who they are' (*label the act, not the child*).
- Make sure you are up to date with identifying child protection issues and report any concerns to the designated member of staff for safeguarding children.
- Be clear with anyone disclosing any matter that could concern the safety and wellbeing of a pupil that you cannot guarantee to keep this information to yourself.
- Be friendly but NOT 'a friend'.

**I confirm that I have read and understood the code of conduct for Edgeborough School and agree to abide by its contents:**

Name \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_