

# SAFEGUARDING CHILDREN POLICY

*This policy is made available to parents of all new pupils, day and boarding, on the School website and on request from the School Office. It is available to the Staff<sup>1</sup> at the School from the School website, in the Staff Handbook (electronic) and on request from the School Office. Content of this policy is directly discussed with new staff upon induction into the School.*

## **Statement of Intent**

The safety and welfare of all our pupils at Beechwood Sacred Heart School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. In all matters relating to child protection the School will follow the procedures laid down by our own Local Safeguarding Children Board (LSCB) together with DfE guidance contained in *Working Together to Safeguard Children* (1<sup>st</sup> August 2018) and *Keeping Children Safe in Education* (KCSIE September 2018). This policy is applicable to the whole School community, including those pupils in the Early Years Foundation Stage (EYFS).

All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy; safeguarding and promoting the welfare of children is everyone's responsibility. This includes a duty both to children in need and to children at risk of harm. All staff should read and understand at least Part 1 of KCSIE and Annex A that is distributed to all staff. All School staff should be aware that child protection incidents can happen at any time and anywhere and are required to be alert to any possible concerns. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989. The Governors ensure that the following mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of KCSIE. This policy has been authorised by the Governors, is addressed to all members of staff and volunteers and is available to parents on request. It applies wherever staff, temporary staff or volunteers are working with pupils even when they are away from the School, for example at an activity centre or on an educational visit. Safeguarding and promoting the welfare of children is defined in KCSIE as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

'Children' includes everyone under the age of 18.

All staff members need to be aware of systems at Beechwood which support safeguarding and these explained through this and other policies (see below), as part of annual safeguarding training and staff induction. This should include: the Safeguarding Children policy; the staff Code of Conduct; the identities and role of the Designated Safeguarding Lead (DSL) and other Safeguarding Leads, Whistleblowing Policy and Behaviour, Rewards and Sanctions Policy and the expected response for children missing education.

All staff members receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are

unsure, they should always speak to the Designated Safeguarding Lead (DSL).

## **Policy Statement**

The statutory framework for Child Protection was established in the Children Act (1989). The duty of independent schools' proprietors and/or Governors to safeguard and promote the welfare of children who are pupils at the School was explicitly stated in the Education Act (2002). Independent schools are also recommended to follow DfE guidance published in Working Together to Safeguard Children (revised February 2017 1<sup>st</sup> August 2018), Safeguarding Children: Safer Recruitment and Selection in Education Settings (2007), Keeping Children Safe in Education (September 2016 September 2018), the National Minimum Standards for Boarding Schools (2015) together with the advice and guidance contained in the Dealing with Allegations of Abuse Against Teachers and Other Staff (2012), Disqualification under the Childcare Act (Feb 2015), Prevent Strategy (June 2015), What to do if you are Worried a Child is Being Abused (March 2015), The Prevent Duty: Departmental Advice for schools and childminders (June 2015), The use of social media for on line radicalisation (July 2015), Mandatory Reporting of Female Genital Mutilation-procedural information (October 2015) and Multi-agency statutory guidance on female genital mutilation (April 2016).

The school also follows guidance and procedures outlined by Kent Local Safeguarding Children's Board <http://www.kscb.org.uk>

The School's policy has been drawn up with reference to all of these guidelines to ensure that we practise safe recruitment. The policy plays a crucial role in sustaining effective child protection in the day-to-day running of the School. It is the responsibility of all School staff to safeguard and promote the welfare of our students; specifically, it is to identify students who may be in need of extra help or who are suffering, or are likely to suffer, significant harm, and to play their part in creating an environment where pupils feel safe and can thrive and flourish thus building resilience and lowering the likelihood of harm.

<sup>1</sup> The definition of 'staff' is: *Any person working at the school whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer. The following are included: teachers, peripatetic teachers and coaches, part time staff, students, administrative staff, caretakers and other ancillary staff, staff appointed from overseas, pupils paid to work at the school (for examples as after-school carers)* ISI Regulatory Requirements, February 2016, Part 4, Section 211/212.

### **1.1 Children in Need**

The school recognises that pupils who are in need, abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation or some sense of blame. The school may be the only stable, safe and predictable element in their life. When at school their behaviour may be challenging and defiant or they may appear withdrawn. In these instances, the school will endeavour to support the pupil through: (a) The content of the curriculum. (b) The school aims and ethos which promotes a positive, secure environment and gives the pupils a sense of being valued. (c) The school ensuring that the pupil knows that some behaviour is unacceptable but they are still valued. (d) Inter-agency liaison. (e) Information sharing, insofar as if a student suffering abuse leaves, their information is transferred to the new school immediately and key-workers are informed where appropriate.

Some children are at increased risk of neglect and or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

To ensure that all of our children receive equal protection, we will give special consideration and attention to children who are:

- disabled or have special educational needs (SEND) whether or not they have a statutory education, health and care plan.
- living in a known domestic abuse situation
- affected by known parental substance misuse
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- living in chaotic, neglectful and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking
- do not have English as a first language.
- ‘Looked After’ Children (LACs) or children in care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. (KCSIE Sep 2018) When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. The designated member of staff is Mrs Donna Hope.
- vulnerable due to mental and emotional health issues e.g. potential self-harming, severe panic attacks, eating disorders, children who may have experienced family break-up or bereavement.
- Is a young carer
- Is frequently missing/goes missing from care or home
- Is misusing drugs or alcohol
- Is in a family circumstance presenting challenges for the child ie Toxic Trio
- Has returned home to their family from care

Special consideration and attention includes monitoring through the pastoral and tutorial systems of the School: the House and tutor system underpin this care; the Heads of Division and Deputy Head, the Bullying log, Pupil Watch and Child Protection file will all be used and liaison with external agencies. All pupils are aware that they can talk to any member of staff in school but are encouraged to talk particularly to their tutor, Head of Division, School Chaplain, School Nurse, Deputy Head or school counsellors in order to facilitate early intervention.

### **Use of Reasonable Force**

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person

needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

As a boarding school there are additional factors to consider with regards to safeguarding set out in the [National Minimum Standards](#). For example, the School should be alert to inappropriate pupil relationships, initiation type behaviours and the potential for peer on peer abuse, particularly if there is a significant gender imbalance.

Section 17 of the Children Act 1989 defines a child as being in need in law if:

- He or she is unlikely to achieve or maintain or to have the opportunity to achieve or maintain a reasonable standard of health or development without provision of services from the LA;
- His or her health or development is likely to be significantly impaired, or further impaired, without the provision of services from the LA;
- He or she has a disability.

Development can mean physical, intellectual, emotional, social or behavioural development. Health can be physical or mental health.

Having a disability is defined as a person who is blind, deaf, dumb, suffering from a mental disorder, substantially and permanently handicapped by illness, or congenital deformity or from suffering from some other disability as may be prescribed.

**1.2 Children at Risk:** The Designated Safeguarding Lead (DSL) will make an immediate referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

**1.3** As part of the ethos of the school, the staff and Governors are committed to:

- i. listening to, relating effectively with and valuing each individual pupil in our care;
- ii. encouraging and supporting parents, carers and guardians and working together in partnership with them; and
- iii. ensuring that all members of staff, both teaching and support, full-time and part-time, and other adults working in school are properly trained and supported. Induction training covers the Safeguarding Policy, the Behaviour, Rewards and Sanctions Policy, the Staff Code of Conduct, the role of the DSL and the deputies and their identities, Whistleblowing

Policy , and details of the safeguarding response to children missing education. Catering Staff will receive training from Brookwood which is the catering company employed by the school as well as whole school training at Beechwood.

- iv. Any concerns about a child's welfare are acted upon immediately,

As such, Beechwood School will take all reasonable measures to:

- a. Ensure that all staff and adults will be issued with Part 1 of the most recent version of KCSIE and school leaders and those who work directly with children read Annex A.
- b. Ensure that all staff receive annual Child Protection training from the Area Safeguarding Adviser Gemma Willson .(September 11<sup>th</sup> 2018)
- c. Ensure that all staff and Governors will be given appropriate training covering risks of radicalisation and extremism and how to identify pupils at risk. This may include the online training programme NCALT.
- d. Ensure that we practise safe recruitment (see Safer Recruitment Policy) in checking the suitability of staff and volunteers (pre- appointment checks); 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. Please refer to Safer Recruitment Policy
- e. Ensure that we carry out all necessary checks on the suitability of people who serve on the School's governing body in accordance with the regulations and guidance above; refer to policy on the Recruitment of Proprietors, Governors, Members and Volunteers
- f. Ensure that where the school ceases to use the services of any person (whether employed, contracted, a volunteer or student) because the person was considered unsuitable to work with children, a prompt and detailed report is made to the Disclosure and Barring Services;
- g. Follow the local multi-agency procedures and advice as set out by the *Children, Families and Education Department at Kent County Council*;
- h. Protect each pupil from any form of abuse, whether from an adult or another pupil;
- i. Be alert to signs of abuse both in the School and from outside;
- j. Deal appropriately with every suspicion or complaint of abuse;
- k. Design and operate procedures which promote this policy;
- l. Design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- m. Support children who have been abused in accordance with his/her agreed child protection plan;
- n. Be alert to the medical needs of children with medical conditions and children who have mental and emotional issues
- o. Operate robust and sensible health & safety procedures;
- p. Take all practicable steps to ensure that School premises are as secure as circumstances permit;
- q. Operate clear and supportive policies on drugs, alcohol and substance misuse;
- r. Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our schools or in our local area; and
- s. Have regard to guidance issued by the Secretary of State for Education and Skills in accordance with *Section 157 Education Act 2002* and associated regulations.

- t. Ensure that normal referral processes are available when there are concerns about a child being drawn in to radicalisation / terrorism, see AUP Policy
- u. Pupils will receive assemblies, talks, lessons and workshops about safeguarding and E-Safety through the PSHE and IT curriculum focusing on how to build resilience to risks of radicalisation.
- v. A specialist in E Safety will deliver workshops to the pupils, staff and parents annually.
- w. Ensure that the School provides extensive support to children with mental and emotional health issues. Pastoral support from within school includes the school nurse, independent counsellor referral as well as referral to GPs and possibly CAMHS. If it is reported that a child feels suicidal then the parent of a day pupil will speak to the family GP and inform the School of the advice given. Boarders will be referred to the School GP and advice will be given to staff via the School Nurse.
- x. That staff are aware that anyone can make a referral and that staff must take immediate action.

**1.4** All safeguarding concerns involving pupils are to be referred to the **Area Safeguarding Adviser (Education) Gemma Willson** , who can be contacted on **03000 412284** Allegations against an adult in the School (or outside the School as might be necessary) will be referred to **Jinder Pal Kaur**, the **Local Authority Designated Officer** within one working day, who can be contacted on **03000 410888** for advice and potential action. The LADO team manages allegations against named staff and deals with staff issues and or staff conduct. If any deficiencies or weaknesses in the School's child protection arrangements become apparent at any time, they will be remedied without delay. Every complaint or suspicion of abuse from within or outside the School will be investigated by external agencies in all circumstances and will be referred to West Kent Area Safeguarding Advisor, the Child Protection Unit of the Police (CPU) or the NSPCC.

**Details of the Local Area Safeguarding Board (LSCB) can be found at:**  
<http://www.kscb.org.uk/>

The School has a number of other policies and procedures, which should be read in conjunction with this policy, including, in particular, the Anti-Bullying Policy, Staff Code of Conduct, IT AU Policy ,Behaviour, Rewards and Sanctions Policy and the Whistleblowing Policy.

**If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral, parental consent is not required for referrals to statutory agencies.**

If staff members have any concerns about a child (as opposed to a child being in immediate danger they must have a conversation with the DSL to agree a course of action, although any staff member can make a referral to children's social care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the Local Safeguarding Children Board. If anyone other than the DSL makes the referral, they should inform the DSL as soon as possible, and certainly within 24 hours.

## 2. Signs of Abuse

The school recognises that some children today are the victims of neglect and/or physical, sexual or emotional abuse and that staff of the School, by virtue of their day-to-day contact with and knowledge of the children in their care, are well placed to identify such abuse and offer support to children in need. The Law defines someone as a child until he or she is 18.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Types of abuse and neglect can be:

- i. **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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.
- ii. **PHYSICAL** – for example beating or punching; female genital mutilation. A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- iii. **EMOTIONAL** – for example rejection and denial of affection; child radicalisation. The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- iv. **SEXUAL** – for example sexual assault or encouraging a child to view sexually explicit material; child sexual exploitation. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Child sexual exploitation (CSE) is a form of sexual abuse\*. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under

the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child Sexual Exploitation does not always involve physical contact; it can also occur through the use of technology, where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. 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;
- and
- Children who regularly miss school or education or do not take part in education.

Sexual offences under the Sexual Offences Act 2003 including rape and sexual assault must be reported to the Police.

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

Keeping Children Safe in Education (September 2018) has identified in addition to the terms above specific safeguarding issues which include, Child Sexual Exploitation (CSE), Bullying and Cyber Bullying, Faith Abuse, Radicalisation and Honour Based Violence (HBV) including forced marriage and Female Genital Mutilation (FGM), gangs and domestic violence. The School recognises its obligation and duty of care as regards all the Safeguarding issues identified in this document, however, Female Genital Mutilation is a pertinent consideration for the School given that some of our overseas boarders may emanate from communities that are known to practise Female Genital Mutilation. Female Genital Mutilation is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death. Female Genital Mutilation



is a criminal offence – it is child abuse and a form of violence against women and girls, and therefore should be treated as such. Female Genital Mutilation is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. It serves as a complex form of social control of women’s sexual and reproductive rights. The School is mindful that girls at risk of Female Genital Mutilation may not be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. The School’s response to this particular safeguarding concern or the others as set out in the document Keeping Children Safe in Education will follow its guidance and the guidance contained within this Policy that requires that we activate local safeguarding procedures, using national and local protocols for multi-agency liaison with the Police and Children’s Social Care. Reference can also be made to the Serious Crime Act (2015). Cases directly disclosed by the victim **must** be reported to the Police by close of the next working day. (CALL 101). In line with safe guarding best practice parents/guardians and the victim should be contacted to explain the report and why it is being made. This should be done prior to the report being made. If however it is believed that telling the child /parents about the report might result in a risk of serious harm being done to the child or anyone else or of the family fleeing the country then the report should not be discussed.

From October 2015, all teachers (along with social workers and healthcare professionals) have a **statutory duty** to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Headmaster to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols (<http://www.kscb.org.uk> ). Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation: procedural information (<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information> )

So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such . If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and

groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Forcing a person into a marriage is a crime in England and Wales. 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. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Staff will be made aware that safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours linked to drug taking, alcohol abuse, truancy, gender based violence and sexting also put children in danger. Students belonging to gangs is also a safeguarding issue and should be reported to the DSL.

The School recognises that children are capable of abusing their peers. Peer on peer abuse can take different forms, but abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. The School also recognises different types of peer on peer abuse, for example, sexual violence and harassment, initiation/hazing type violence and bullying or cyber bullying. All peer on peer abuse will be managed in accordance with this policy and a bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm and will warrants a response under these procedures rather than the School's Behaviour and Exclusions Policy.

**All** staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying, emotional abuse (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

‘Sexting’ or ‘youth produced sexual imagery’ is ‘sending or posting sexually

suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.’ Creating and sharing sexual photos and videos of under-18s is illegal. Making, possessing and distributing any imagery of someone under 18 which is ‘indecent’ is illegal. This includes pupils making images of themselves for a child under 18. Young people who share sexual imagery of themselves, or peers, are breaking the law. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically:

- It is an offence to possess, distribute, show and make indecent images of children.
- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

The procedure for dealing with an incident involving youth produced sexual imagery:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate school staff.
- There should be subsequent interviews with the young people involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children’s social care and/or the police immediately. The School will follow the procedures contained within the detailed guidance with regard to disclosure, initial review meetings, risk assessment and referral provided by [UK Council for Child Internet Safety \(UKCCIS\) Education Group](#). In addition the DFE provides [searching screening and confiscation advice for schools](#).

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

Victims and perpetrators of peer on peer abuse will be offered support by the School, as appropriate - e.g. counselling.

Possible signs of abuse include (but are not limited to):

- vi. the pupil says he/she has been abused or asks a question which gives rise to that inference;
- vii. there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- viii. the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour;

- ix. the pupil develops an interest in radical views e.g. through internet searches that causes a change in behaviour
  - x. the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
  - xi. the pupil's development is delayed;
  - xii. the pupil loses or gains weight;
  - xiii. the pupil may be self-harming
  - xiv. the pupil appears neglected, e.g. dirty, hungry, inadequately clothed; and
  - xv. the pupil is reluctant to go home, or has been openly rejected by his or her parents or carers.
  - xvi. the pupil has 'gone missing' from School for a period of time with little or no notice; or there is a pattern of repeated absence. This will be reported to LA if for more than 10 days. Children Missing Education will be contacted. CME will also be contacted if a student comes off roll and there has been no confirmation of where the student is now being educated. Where reasonably possible the school should have more than one emergency number for pupils.
  - xvii. signs of radicalisation.
  - xviii. the pupil withdraws from PE after having been away from school after an extended period, illness or holiday (possible indicator of FGM).
  - xix. The school recognizes the added vulnerability of children with SEND
- Any member of staff who receives a disclosure of abuse or suspects that abuse may have occurred should follow the procedure as laid out in this document – see '4. Procedures'.

## 2.1 Prevent

Protecting children from the risk of radicalisation should be seen as part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people from being radicalised. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme (<https://www.gov.uk/government/publications/channel-guidance>).

With regard to the Prevent Duty, the School will co-operate with Channel panels and the Police with assessments are being undertaken.

The school's responsibilities under the Prevent Duty involve four general themes, namely risk assessment, working in partnership, staff training, and IT policies, and include the following:

- Assessing the risk of pupils being drawn into terrorism, including extremist ideologies
- Continuing to work in partnership with local authorities
- Assessing the need for staff training
- Ensuring that the DSL undertakes Prevent awareness training
- Ensuring that suitable filtering and monitoring is in place on school internet, and that school ICT training for pupils and staff includes the risk

of radicalisation and the dangers of extremism. This is reflected in the ICT AUP.

## **2.2 Online Safety**

The use of technology has become a significant component of many safeguarding issues. The Safeguarding Lead with responsibility for Online Safety is Josh Rowe.

Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorized

into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

The School will ensure that:

- appropriate filters and monitoring systems are in place to keep children safe online. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm;
- children are taught about safeguarding, including online; and
- staff are equipped with the knowledge to safeguard children online by attending online safety training.
- The School's E-Safety and Acceptable Use and Use of Mobile Phone policies also sets out the School's approach to online safety and further guidance is contained within KCSIE (September 2018). The Education Safeguarding Adviser-Online Protection is Rebecca Avery 03000415797 rebecca.avery@kent.gov.uk

## **3. The Role of the Designated Safeguarding Lead (DSL)**

### **3.1 The Designated Safeguarding Lead**

The School has appointed a senior member of staff (the Head) with the necessary

- a. status and authority to be responsible for matters relating to child protection and welfare. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The current deputies are Victoria Wright EYFS, Deborah Roberts-Barter, Head of Boarding and Josh Rowe, Head of Middle Division.

The main responsibilities of the Designated Safeguarding Lead are:

- a. to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection generally leading on early help care and liaising with external agencies
- b. to co-ordinate the child protection procedures in the School;
- c. to maintain an on-going training programme for all School employees as well as being part of new staff induction in line with LSCB advice including Prevent and online safety ;

- d. to monitor the keeping, confidentiality and storage of records in relation to child protection, this includes the School's yellow forms used by staff for reporting concerns about pupils which are kept electronically and are accessible to the Head, Head of Prep and Deputy Head and the forms from the schools of new pupils which declare any historical or ongoing child protection issues
- e. to liaise with the Designated Person responsible for Child Protection appointed by Kent County Council.
- f. to ensure that the Safeguarding policy is reviewed annually with the lead Governor (Gillian Hill) with responsibility for safeguarding, this report is then shared with all governors
- g. Where children leave the school ensure their child protection file is transferred to the new school as soon as possible, this should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. It may be appropriate to share information in advance of the child moving school.

**3.2** The DSL at Beechwood Sacred Heart School is **Mrs Helen Rowe** ( Head) who may be contacted on **01892 532747 Ext: 8604**. She will:

- a. act upon all suspicion, belief and evidence of abuse reported to her;
- b. when there is cause to suspect that a child is suffering, or likely to suffer, significant harm inform Kent County Council Children's Social Services Central Duty Team (**03000 411111**) or the 'Out of Hours' Duty Team (**03000 419191**), the Police and other necessary external agencies as soon as possible, but within one working day. **Early Help & Preventative Services:** [earlyhelp@kent.gov.uk](mailto:earlyhelp@kent.gov.uk) or ring **03000 419222**
- c. inform the **Area Safeguarding Adviser (Education), Gemma Willson 03000 412284**, together with **the Local Area Designated Officer, Jinder Pal Kaur on 03000 410888** within one working day. **Other useful contacts:** Claire Ray, Principal Officer (Safeguarding) Office: 03000 415788; Mobile: 07920 108828. Rebecca Avery – Education Safeguarding Adviser – Online Protection Office: 03000 415797; Mobile: 07789 968705; [rebecca.avery@kent.gov.uk](mailto:rebecca.avery@kent.gov.uk)
- d. keep the Head informed of all actions unless the Head is the subject of a complaint. In this situation, the DSL will consult with the Governor responsible for Child Protection at Beechwood who is Gillian Hill or the Chair of Governors, **Mrs Constance Williams**; and
- e. ensure that the School is represented at any relevant child protection conferences or, failing that, that a report is submitted to the conference from the School as required. She will also ensure that any recommendations made by the conference which involve school staff are carried out as agreed.
- f. If, after a referral, the child's situation does not appear to be improving, the DSL will press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- g. If early help or other support is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.
- h. Further guidance regarding the role of DSL is contained in KCSIE (September 2018)

**3.3** If the DSL is unavailable or is herself the subject of a complaint, her duties will be assumed by one of the current deputies who has received appropriate training which is updated at least every two years.

- 3.4 All staff will receive annual Child Protection training from the Area Safeguarding Officer with a register of attendance being taken.
- 3.5 The DSL has undertaken child protection training and training in inter-agency working and attends refresher training at least at two yearly intervals. DSL deputies will also undertake the same frequency and level of training.
- b. The appropriate training will include understanding the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments, developing 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.
  - c. The training will include ensuring each member of staff has access to and understands the school's Safeguarding policy and procedures, especially new and part time staff, being alert to the specific needs of children in need, those with special educational needs and young carers, being able to keep detailed, accurate, secure written records of concerns and referrals.
  - d. The DSL will have higher level training in the LSCB's Prevent strategy to be able to assess the risk of children being drawn into terrorism, including being drawn into support for the extremist ideas that are part of terrorist ideology.
  - e. Lastly the training will enable the DSL to obtain access to resources and attend any relevant or refresher training courses and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in to place to protect them.
- 3.6 The Head ensures that there are sufficient resources and time allocated to allow the DSL to properly discharge her responsibilities.

**4. Procedures An initial complaint or concern - A member of staff suspecting or hearing a complaint of abuse or has a concern must:**

- i. follow the Safeguarding Policy and speak to the DSL (or Deputy)
- ii. an option may be to manage any support for the child internally in the school's own pastoral support process
- iii. an early help assessment may be needed
- iv. a referral for statutory services for example the child might be in need, is in need or suffering or likely to suffer harm may be needed
- v. **staff must** listen carefully to the pupil and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place;
- vi. not ask leading questions, that is, a question which suggests its own answer;
- vii. reassure the pupil but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Person who will ensure that the correct action is taken; and
- viii. keep a brief but sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record, written on a yellow form, should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Person. Record Forms are located in the Staffroom. Access to these records is on a 'need to know' basis and decisions about access

will be made in consultation with the Headmaster. These forms are also kept centrally.

- ix. any concerns must be passed on within one working day of the incident being reported
- x. where the member of staff is concerned that a child may be being drawn into terrorism they may speak to the DSL or phone 101 the non-emergency police number and the DFE for advice 020 7340 7264 [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)
- xi. anybody can make a referral and take immediate action
- xii. parental consent for referrals to statutory agencies is not required
- xiii. Staff should not assume a colleague or professional will take action and share information which is essential for the support of the child. The following government document may be referred to 'Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers.'

When a pupil who is the subject of a Child Protection Plan leaves the School the DSL will inform the pupil's new school immediately and discuss with the pupil's key worker the transfer of any confidential information the school may hold.

**4.2 Preserving evidence** - All evidence - for example, scribbled notes, mobile phones containing text messages, clothing, computers - must be, as far as is possible, safeguarded and preserved.

**NB: The School should not do anything that may jeopardise a police investigation, such as ask a pupil a leading question or attempt to investigate the allegations of abuse.**

**4.3 Reporting** - Allegations against staff (see also Section 7 'Allegations Against Staff' and 'Procedures when a Member of Staff, Volunteer, Child Protection Officer or Head faces Allegations of Abuse') volunteers or the designated person with responsibility for safeguarding should be reported to the Head or if it is reported to the DSL she immediately informs the Head. It is also advised that the DSL should be contacted (unless he or she is the object of the allegation) since the DSL will have received higher level safeguarding training.

If the Head is absent, the allegation should be passed on to the Governor with responsibility for Child Protection or the Chair of Governors. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Governor with responsibility for Child Protection (Gillian Hill) or the Chair of Governors (**Mrs Constance Williams**) without notifying the Head first. In case of serious harm, the Police should be informed from the outset. All allegations against staff or the Head will be referred to the LADO within one working day.

**4.4 Whistleblowing:** All staff are required to report to the Head or the Chair of



Governors any concern or allegations about School practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. In exceptional cases such reports should be made to Ofsted. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. In doing so, the reporting staff member is provided with immunity from retribution or disciplinary action for 'whistleblowing' in good faith. Staff should refer to the School's Whistleblowing Policy.

- 4.5** All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and Staff Code of Conduct policies and in the school's Whistleblowing Policy, are in place for such concerns to be raised with the school's senior leadership team. Where a staff member feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

General guidance can be found at- [Advice on whistleblowing](#)

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **5. Action by the DSL**

- 5.1** The action to be taken will take into account:

- the local inter-agency procedures of Kent County Council – specifically the West Kent Children, Families and Education Department;
- the nature and seriousness of the suspicion or complaint. (A complaint involving a serious criminal offence will always be referred to the West Kent Children, Families and Education Department or the Police without further investigation within the School.); In the case of FGM, from October 2015, it will be mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. If a teacher, or other member of staff suspects that a student has been removed from, or prevented from, attending education as a result of FGM, a referral will be made to the local authority children's or adult's social care and the police. The DSL will consult in all cases with the Local Authority Designated Officer (**Jinder Pal Kaur**), or the Area Safeguarding Adviser (**Gemma Willson**) within one working day.

- 5.2** If there is room for doubt as to whether a referral should be made, the DSL will consult in all cases with the Local Authority Designated Officer (**Jinder Pal Kaur**), or the Area Safeguarding Adviser (**Gemma Willson**) or other appropriate professionals on a no names basis without identifying the family. If a concern is raised a referral will be made within one working day. If the initial referral is made by telephone, the Designated Person will confirm the referral in writing

to Kent County Council – specifically the West Kent Children, Families and Education Department or the Kent’s Safeguarding Children’s Board within one working day. If no response or acknowledgment is received within three working days, the DSL will contact the above agencies within one working day.

### 5.3 Referral guidelines

The DSL will make a referral to West Kent Area safeguarding Team immediately if it is believed that a child has suffered or is at risk of suffering significant harm. In situations where a pupil is not at risk of suffering significant harm but is instead in need of additional support from one or more agencies (referred to as a child ‘in need’) the DSL will still liaise with the local authority in accordance with inter agency procedures and, depending on their advice, will complete a Common Assessment Framework (CAF) form or engage with any other approach offered by the local authority to ensure assessment/ referral of a pupil and/or his parents for appropriate social care services.

If there is room for doubt as to whether a referral should be made, the DSL will consult with the local authority on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay.

If the initial referral is made by telephone the DSL will confirm the referral in writing within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact the local authority again.

Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures in Section 7.

In cases of possible radicalisation, the DSL will consider a referral to the Channel programme (<https://www.gov.uk/government/publications/channel-guidance>).

## 6. Working with External Agencies

- 6.1 Beechwood recognises that it is an agent of referral and not investigation. It fully accepts that the investigation of child abuse is the responsibility of the Social Services Department (Kent County Council Safeguarding Unit) and the Police and will do everything possible to support and assist them in their task. The local contact numbers are: **Gemma Willson** (Area Safeguarding Adviser) on **03000 412284**; or **Jinder Pal Kaur**, the Local Authority Designated Officer on **03000 410888**.

Where there are concerns about children who may be at risk of being drawn into terrorism the DSL will contact the Area Safeguarding Team. Other contacts for agency involvement: local police force, 101 (the non-emergency police number); DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 or email [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk) (open Mon-Friday 9am-6pm)

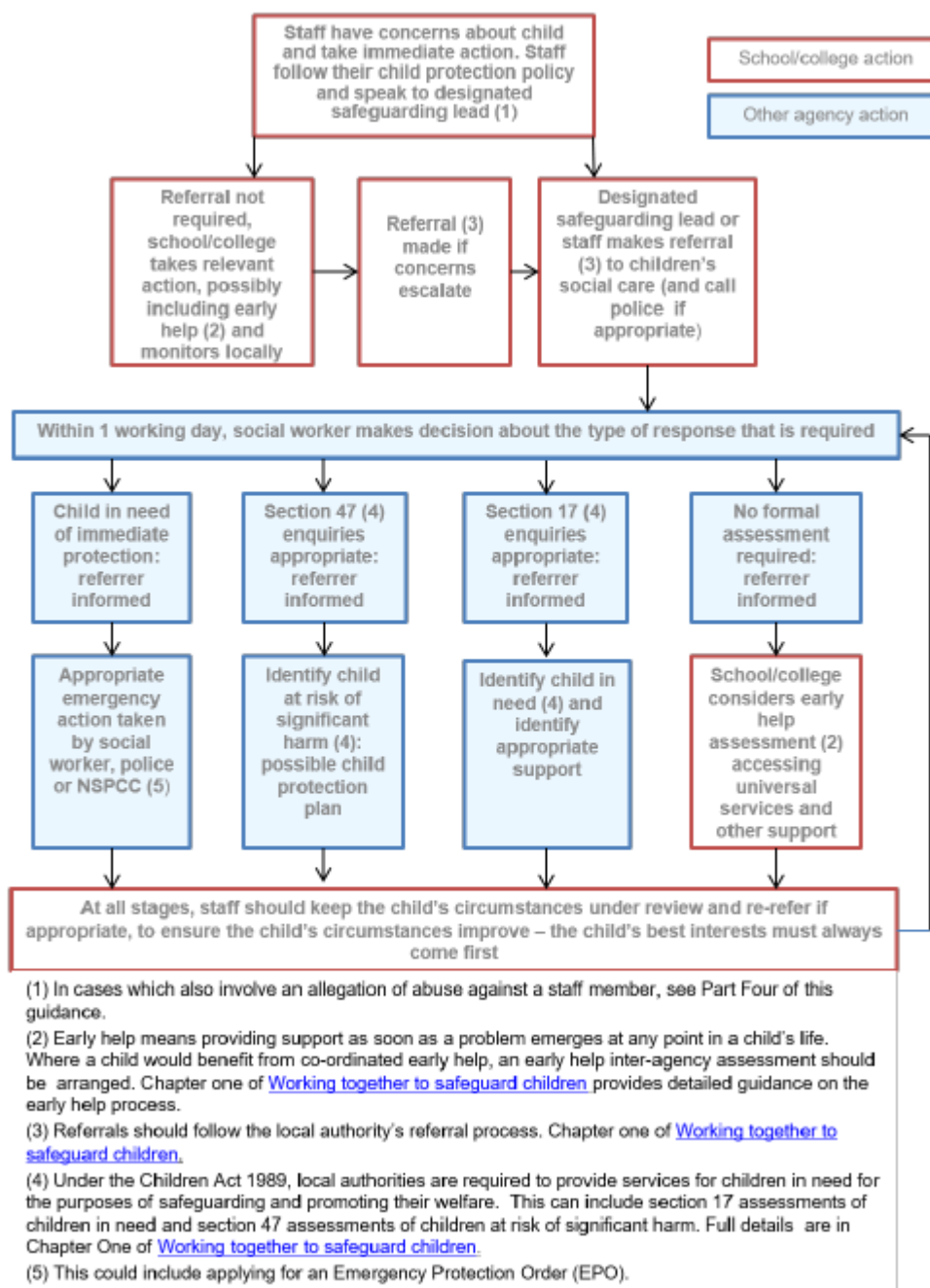
- 6.2 We will endeavour to build relationships with other agencies so that understanding trust and confidence can be built which will help to secure effective co-operation in cases of actual or suspected abuse.

The DSL (or Designated Safeguarding Lead) will consider if an ‘**Early Help Assessment**’ is needed or whether a concern is to be referred directly to the appropriate Safeguarding Unit (Kent, East Sussex, West Sussex). An Early Help Assessment generates coordinated support from more than one agency (School, Health, Housing, and Police) via an multi-agency assessment as requested by the DSL/Designated Safeguarding Lead. A request for an Early Help Assessment

might follow (but not exclusively as concerns about a child can arise at any time) School based intervention(s) such as Mentoring Plans, Welfare Plans, Counselling, CAF or CAHMS referrals. CAF and CAHMS referrals are undertaken at the direction of the Head and DSL, Mrs Helen Rowe, with the Principal Contact for such referrals being the School's DSL. More information regarding Early Help in Kent can be found here: <http://www.kelsi.org.uk/support-for-children-and-young-people/early-help-and-preventative-services/kent-family-support-framework>  
The school will consider the Data Protection Bill and GDPR when information sharing.

- 6.3** Whether or not the School decides to refer a particular complaint to the Social Services Department or the Police, the parents and pupil will be informed in writing of their right to make their own complaint or referral to any of the aforementioned external agencies being provided with all the appropriate names, addresses and telephone numbers.

## Actions where there are concerns about a child



## 7. Allegations against Staff and Volunteers

**7.1** The School procedures for dealing with allegations against staff (and volunteers who work with children) aim 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. These procedures are outlined in the 'Procedures when a Member of Staff, Volunteer, Child Protection Officer or Headmaster faces Allegations of Abuse' and detailed in 'Part 4' of KCSIE. If the allegation is against staff or the Head it will be referred to the LADO within one working day. It is the Head who should report to the LADO ( the Deputy if he is away) but if he is the subject of the complaint then it should be the Chair of Governors who reports to the LADO. The school will not investigate without referral to the LADO

- 7.2 As per the Procedures when a Member of Staff, Volunteer, Child Protection Officer or Head faces Allegations of Abuse suspension will not be an automatic response to an allegation. 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.
- 7.3 If a member of boarding staff is suspended pending a child protection investigation, arrangements will be made for alternative accommodation away from children.
- 7.4 Where an allegation or complaint is made against the DSL or any other member of staff or a volunteer, the matter should be reported immediately to the Headmaster. Any allegation against staff reported to the DSL will be communicated to the Head immediately.
- 7.5 Where an allegation or complaint is made against the Head, the person receiving the allegation should immediately inform the Governor responsible for Child Protection (**Gillian Hill**) or the Chair of Governors (**Mrs Constance Williams**). In the absence of either Governor, the Deputy Head should be contacted without first notifying the Headmaster.
- 7.6 Detailed guidance is given to staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Handbook and Staff Code of Conduct and is an integral feature of Child Protection/Safeguarding training provided by the School.
- 7.7 If the School ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with children, a compromise agreement **will not** be used and there will be a prompt and detailed report to the **Disclosure and Barring Service**. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.
- 7.8 In addition to the School's commitment to report to the Disclosure and Barring Service (DBS), within one month of leaving the School, any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children, the School also has a statutory obligation and may need to consider making a referral to the the newly established Teaching Regulation Agency (TRA)) in instances where a teacher has been dismissed (or would have been dismissed had he/she not resigned). A referral to the TRA would include behaviours deemed as 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. If the School is required to make a referral to the DBS, it will also make a referral to the TRA, although the School is not technically required to do so as the two bodies share information. Where a dismissal does not reach the threshold for DBS referral, the School will give due consideration as to whether a referral ought to be made to the TRA.
- 7.9 Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm

test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and that the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual. Guidance on referrals can be found on [GOV.UK](http://GOV.UK).

- 7.10** Allegations against a teacher who is no longer teaching at the School will be referred to the police. Historical allegations of abuse will also be referred to the police in line with KCSIE 'Part 4' guidance.
- 7.11** Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.
- 7.12** It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

## **8. Allegations against Pupils/Peer Abuse**

Abuse by one or more pupils against another pupil (this can include verbal abuse/ banter, sexting) when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm or is in immediate danger' any such abuse will be referred to Social Care and/or Police. If a child is to be interviewed by the Police the parents must be contacted and an adult must be present at the Police interview. It would be an expectation that in the event of disclosures about pupil on pupil abuse that all children involved, whether perpetrator or victim, are treated as being "at risk". The School will take advice from the Area Safeguarding Officer and Children's Social Care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. This must be done within one working day of the complaint being made. where allegations of abuse or assault have been made against one or more of its own pupils, a thorough risk-assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all pupils and that both alleged victims and perpetrator pupils receive appropriate support. Decisions arising might include, for example, whether the

accused pupil should be removed from school for a period, or from certain classes, whether sleeping arrangements should be changed for boarders, whether contact with certain individuals should be prevented or supervised, the availability of counselling, the adequacy of arrangements for listening to children etc. Good record keeping of related conversations, meetings and communications must be kept.

In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation. Boarding staff will be particularly alert to the increased risks of relationship problems and peer abuse in boarding. All boarding staff will receive induction training from the Head of Boarding.

**8.1 Suspected harm from outside the school:** A member of staff who suspects that a pupil is suffering harm from outside the School should seek information from the child with tact and sympathy using 'open' and not leading questions. A sufficient record should be made of the conversation and if the member of staff continues to be concerned he or she should refer the matter to the DSL.

**8.2 Children Missing from Education:** All staff are informed of the separate procedure (Procedure for Dealing with Missing Pupils) to be used for searching for, and if necessary, reporting any child missing from School. A child going missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect including that a child may be at risk of radicalisation, travel to zones of conflict, FGM or forced marriage. School staff should follow the school's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. A pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more will be reported to the local authority.

**8.3 Informing parents:** Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the LADO and/or the Head before discussing details with parents.

## **9. Early Years Foundation Stage Provision**

**9.1** The DSL will take lead responsibility for safeguarding children within the EYFS setting and for liaising with local statutory children's agencies as appropriate. Victoria Wright is the named deputy in EYFS.

**9.2** The School will inform Ofsted and ISI, as soon as is reasonably practicable and at the latest within 14 days, of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the

action taken in respect of these allegations.

- 9.3** Regard has been made to the Statutory Framework for the Early Years Foundation Stage: Setting the standards for learning, development and care for children from birth to five, in particular Section 3 – The Safe Guarding and Welfare Requirements. The School does comply with Section 3.4 having in place and regard to its Procedures when a Member of Staff, Volunteer, Child Protection Officer or Head faces Allegations of Abuse document, together with its ICT Acceptable Use Policy For School Staff which states that staff in all settings, including EYFS, cannot use mobile phones and personal cameras in the classroom unless permission is sought from the Head, Deputy Head as stated in the School's Staff Acceptable Use Policy.

## **10. Support for Pupils, Staff and Families**

- 10.1** For any pupil undergoing a Child Protection Referral and investigation the need for support will be great and quite often such support will be limited to what the School can offer. We aim at least to provide a secure classroom environment in which the pupil feels valued and protected and will make other support, such as accommodation in the boarding area, available where appropriate.
- 10.2** The DSL and the Head will, whenever possible, make themselves available to discuss individual children or situations with concerned members of staff.
- 10.3** The School will offer support where possible to the family of a pupil or pupils involved in a protection investigation within the time and expertise constraints of its role and always remembering the limits of confidentiality and the fact that it is the welfare of the child that is paramount.

## **11. The Role of the Governing Body**

- 11.1** The Board of Governors will nominate a Governor to be responsible for child protection issues – currently Gillian Hill. In the absence of the nominated Governor, any urgent matter should be brought to the attention of the Chair of Governors.
- 11.2** The nominated Governor will ensure, in liaison with the Head that the School has an appropriate Child Protection Policy and accompanying procedures in a place which is known to all members of staff. An annual review of the Child Protection and Safeguarding arrangements and accompanying policies is undertaken by the Governor with responsibility for Safeguarding (Gillian Hill) which is discussed through the Education and pastoral Committee and reviewed by the Board of Governors. A detailed minute of discussions will be taken by the Company Secretary.
- 11.3** He/she will liaise when necessary with the DSL and/or the Head regarding any allegations of abuse.
- 11.4** Should a complaint be made to any Governor about action by the Head or any other member of staff of a child protection nature, it should be passed immediately to the Governor responsible for Child Protection who will seek appropriate advice from external agencies.
- 11.5** The Governors will receive annually a report on changes to the Safeguarding Children Policy and/or any associated procedures; training undertaken by the



DSL, Head and other staff; and the number of incidents/cases (without details or names).

## **MONITORING AND EVALUATION OF THIS POLICY**

This policy will be reviewed annually as a minimum but may be updated more frequently subject to regulatory changes. The School monitors and evaluates its safeguarding policy and procedures through the following activities:

- Governing body visits to the School;
- Senior leadership team discussion sessions with children and staff
- Pupil questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the School [e.g. sufficient account must be taken of the nature, age range and other significant features of the School, such as historical issues, in the provisions made for safeguarding].
- Frequent scrutiny of governing body meeting minutes
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the senior leadership team and the governing body
- Regular review of parental concerns and parental questionnaires
- Regular review of the use of pupil-specific common rooms and clubs at lunchtime and after school
- Regular review of training offered to staff, including e-safety training.

Reviewed by DSL Helen Rowe September 2018 and Safeguarding Governor, Gillian Hill. Date of next review September 2019

## Specific safeguarding issues Part 1 (KCSIE September 2018)

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- [bullying including cyberbullying](#)
- [children missing education](#) – and Annex A
- [child missing from home or care](#)
- [child sexual exploitation \(CSE\)](#) – and Annex A
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#) – and Annex A
- [forced marriage](#)- and Annex A
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)
- [preventing radicalisation](#) and Annex A
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

Annex A contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff who work directly with children

should read the annex.

## Additional advice and support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	<a href="#">What to do if you're worried a child is being abused</a>	DfE advice
	<a href="#">Domestic abuse: Various Information/Guidance</a>	Home Office
	<a href="#">Faith based abuse: National Action Plan</a>	DfE advice
	<a href="#">Relationship abuse: disrespect nobody</a>	Home Office website
Bullying	<a href="#">Preventing bullying including cyberbullying</a>	DfE advice
Children and the courts	<a href="#">Advice for 5-11-year olds witnesses in criminal courts</a>	MoJ advice
	<a href="#">Advice for 12-17 year old witnesses in criminal courts</a>	MoJ advice
Children missing from education, home or care	<a href="#">Children missing education</a>	DfE statutory guidance
	<a href="#">Child missing from home or care</a>	DfE statutory guidance
	<a href="#">Children and adults missing strategy</a>	Home Office strategy
Children with family members in prison	<a href="#">National Information Centre on Children of Offenders</a>	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	<a href="#">County Lines: criminal exploitation of children and vulnerable adults</a>	Home Office guidance
	<a href="#">Child sexual exploitation: guide for practitioners</a>	DfE
	<a href="#">Trafficking: safeguarding children</a>	DfE and HO guidance
Drugs	<a href="#">Drugs: advice for schools</a>	DfE and ACPO advice
	<a href="#">Drug strategy 2017</a>	Home Office strategy
	<a href="#">Information and advice on drugs</a>	Talk to Frank website

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
	<a href="#">ADEPIS platform sharing information and resources for schools: covering drug (&amp; alcohol) prevention</a>	Website developed by Mentor UK
"Honour Based Violence" (so called)	<a href="#">Female genital mutilation: information and resources</a>	Home Office
	<a href="#">Female genital mutilation: multi agency statutory guidance</a>	DfE, DH, and HO statutory guidance
	<a href="#">Forced marriage: information and practice guidelines</a>	Foreign Commonwealth Office and Home Office
Health and Well-being	<a href="#">Fabricated or induced illness: safeguarding children</a>	DfE, Department for Health and Home Office
	<a href="#">Rise Above: Free PSHE resources on health, wellbeing and resilience</a>	Public Health England resources
	<a href="#">Medical-conditions: supporting pupils at school</a>	DfE statutory guidance
	<a href="#">Mental health and behaviour</a>	DfE advice
Homelessness	<a href="#">Homelessness: How local authorities should exercise their functions</a>	HCLG
Online	<a href="#">Sexting: responding to incidents and safeguarding children</a>	UK Council for Child Internet Safety
Private fostering	<a href="#">Private fostering: local authorities</a>	DfE - statutory guidance
Radicalisation	<a href="#">Prevent duty guidance</a>	Home Office guidance
	<a href="#">Prevent duty advice for schools</a>	DfE advice
	<a href="#">Educate Against Hate Website</a>	DfE and Home Office
Violence	<a href="#">Gangs and youth violence: for schools and colleges</a>	Home Office advice
	<a href="#">Ending violence against women and girls 2016-2020 strategy</a>	Home Office strategy
	<a href="#">Violence against women and girls: national statement of expectations for victims</a>	Home Office guidance
	<a href="#">Sexual violence and sexual harassment between children in schools and colleges</a>	DfE advice
	<a href="#">Serious violence strategy</a>	Home Office Strategy