



KINGHAM HILL SCHOOL

POLICY DOCUMENTS

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Nominated Safeguarding Governor Ruth Reavley	Email: r.reavley@kinghamhill.org Telephone number: 07817 199868

Contacts

Designated Officer(s) of the Local Authority	Alison Beasley
Telephone number	01865 323457
Email	alison.beasley@oxfordshire.gov.uk Team email: lado.safeguarding children@oxfordshire.gov.uk
Oxfordshire County Council's children's social care department	
Telephone number	01865 810603
Email	safeguardingchildren@oxfordshire.gov.uk
Multi Agency Safeguarding Hub (MASH)	
Telephone number	0345 050 7666
Email	mash-childrens@oxfordshire.gcsx.gov.uk
The local police non-emergency contact number for Female Genital Mutilation (FGM) reporting is 101.	
The telephone numbers of relevant Prevent partners are as follows:	
Channel referrals	0345 050 7666 preventreferrals@thamesvalley.pnn.police.uk
Non-emergency DfE advice	020 7340 7264 counter-extremism@education.gsi.gov.uk
The National Society for the Prevention of Cruelty to Children (NSPCC) whistleblowing helpline can be contacted on:	
NSPCC Weston House 42 Curtain Road London EC2A 3NH	
Telephone number	0800 028 0285
Email	help@nspcc.org.uk



Safeguarding and Child Protection Policy and Procedures

1. Introduction and Policy statement

- **Scope.** Kingham Hill School fully recognises its moral and statutory responsibility to safeguard and promote the welfare of children. This policy sets out how the School, through its staff, discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children, staff and others who come into contact with the School.
- **Interpretation.** The “Head” includes deputies. “Staff” refers to all those working for or on behalf of the School (including staff working on behalf of third party contractors, such as catering staff), full or part-time permanent or temporary, in either a paid or a voluntary capacity (this includes Governors). “Parent/s” includes one or both of the parents, legal guardians or education guardians.
- Every pupil should feel safe and protected from any form of abuse and neglect. The School is committed to safeguarding and promoting the welfare of children and young people and requires everyone who comes into contact with children and their families to share this commitment. Children includes everyone under the age of 18.
- Keeping children safe in education (2018)(KCSIE) defines safeguarding and promoting the welfare of children 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.

2. Scope and application.

- This policy applies to the whole School.
- This policy applies at all times including where pupils or staff are away from School.
- This policy applies to core School activities and to out of hours and commercial activities.
- This policy is designed to address the School’s charity law safeguarding duty to:
 - Provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers

- Set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly
 - Have adequate safeguarding policies, procedures and measures to protect people
 - Provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Charity Commission.
- This policy is designed to address the specific obligations on the School to safeguard and promote the welfare of children, as defined below.

3. Regulatory Framework

- This policy has been prepared to meet the School's responsibilities under:
 - Education (Independent School Standards) Regulations 2014
 - Boarding schools: national minimum standards (Department for Education (DfE) April 2015)
 - Education and Skills Act 2008
 - Children Act 1989
 - Children and Social Work Act 2017
 - Data Protection Act 2018 and General Data Protection Regulation (GDPR)
 - Equality Act 2010
 - Charities Act 2011.

- The School's Child Protection and Safeguarding Policy and Procedures (Policy) has regard to the following guidance and advice:
 - Keeping children safe in education (2018) (KCSIE)
 - Working together to safeguard children (2018) (WTSC)
 - Revised Prevent duty guidance for England and Wales (July 2015)
 - Channel duty guidance: protecting vulnerable people from being drawn into terrorism (2015)
 - Multi-agency statutory guidance on Female Genital Mutilation (FGM) (2016)
 - What to do if you're worried a child is being abused: advice to practitioners (2015)
 - Information share: advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
 - Sexting in schools and colleges: responding to incidents and safeguarding young people (2016) (UKCCIS). Information from Oxfordshire Safeguarding Board oscb.org.uk.
 - Children missing education (DfE September 2016)
 - Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE February 2017)

- Sexual violence and sexual harassment between children in schools and colleges (DfE May 2018)
 - Searching, screening and confiscation: advice for schools (DfE January 2018)
 - Listening to and involving children and young people (DfE January 2014)
 - Safeguarding children (links to government guidance and resources)
 - Strategy for dealing with safeguarding issues in charities (Charity Commission December 2017)
 - Regulatory alert to charities – safeguarding (Charity Commission December 2017)
 - How to report a serious incident in your charity (Charity Commission September 2017).
- The School will:
 - Follow the local inter-agency procedures of the Oxfordshire Safeguarding Children Board (OSCB) in particular the Oxfordshire Safeguarding Children Board Threshold of Needs, Multi-agency procedures and documents
 - Work together with Local Safeguarding Partners (LSPs) and retain a good working knowledge of all local arrangements including MASH, Locality and Community Support Services (LCSS) and the numerous systems available within 'early help'. The Safeguarding Team (DSL and Deputy DSLs) are the main point of contact with all LSPs and other appropriate agencies.
 - The DSL will ensure that staff have sufficient information of LSP arrangements and training opportunities
 - Ensure that we practise safer recruitment in checking the suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children and young people. See the School's separate Recruitment and Selection Policy, and Recruitment of Proprietors, Governors and Trustees Policy
 - Take all reasonable steps to ensure that its pupils and others who come into contact with the School do not, as a result, come to harm or are exposed to abuse
 - Deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his/her agreed child protection plan
 - Design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations
 - Be alert to the needs of children with physical and mental health conditions
 - Operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse
 - Assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area
 - Identify children who may be vulnerable to radicalisation, and know what to do when they are identified
 - Respond to children who go missing from education
 - Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in the local area.

- **Contextual safeguarding**

- Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School
- All staff, including the DSL, should consider the context within which such incidents and/or behaviours occur, for example where environmental factors are present in a child's life that may be a threat to their safety and/or welfare
- Children's services should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse
- Staff may follow the School's Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details).

- **Application and accessibility**

- This Policy is a whole-school policy and applies wherever staff, Governors and volunteers are working with pupils even where this is away from the School, for example an educational visit
- This Policy is published on the School website and is available in hard copy on request. It can be made available in large print or other accessible format if required.

- **Related policies**

- The following policies, procedures and resource materials are also relevant to the School's safeguarding practices:
 - School Staff Handbook and Code of Conduct
 - Whistleblowing Policy
 - Recruitment and Selection Policy
 - Recruitment of Proprietors, Governors and Trustees
 - e-Safety Policy
 - Acceptable Use of Network Agreements
 - Anti-bullying Policy
 - Behaviour Policy
 - Security and Access Policy
 - Risk Assessment Policy
 - Missing Pupil Policy
 - Special Educational Needs and Learning Disabilities Policy
 - First Aid Policy (incorporating the administration of medicines and supporting pupils with medical conditions)
 - Terms of reference for the Safeguarding Governor
 - Control and Restraint of Pupils Policy
 - Visiting Speakers Policy

➤ Visitors to Staff Accommodation Policy.

- These policies, procedures and resource materials are available to staff on the Google Team Drive and hard copies are available on request.

4. Designated Safeguarding Lead

- The School's Governing Body has appointed a Designated Safeguarding Lead (DSL). The DSL is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility for safeguarding and child protection.
- The DSL shall be given the time, funding, training, resources and support to enable him/her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.
- The name and contact details of the DSL are set out in the School contacts list at the front of this Policy. The main responsibilities of the DSL are set out in Appendix 1.
- If the DSL is unavailable the activities of the DSL will be carried out by one of the Deputy DSLs. The Deputy DSLs' details are also set out in the School contacts list at the front of this Policy. In this Policy, reference to the DSL includes the Deputy DSL where the DSL is unavailable.
- The DSL and Deputy DSLs may be contacted on their mobile telephones in relation to any safeguarding concerns out of School hours.
- Since May 2017, the School records all safeguarding and pastoral concerns on CPOMS. Elevated access users are able to control the security of all files. These users are the DSL, the Deputy DSLs and the Head.
- The Safeguarding Team are the main point of contact with LSPs and related agencies and are responsible for providing sufficient information to the staff.

5. Duty of staff, Governors and volunteers

- All staff, Governors and volunteers of the School are under a general legal duty:
 - To protect children from abuse
 - To be aware of the terms and procedures in this Policy and to follow them
 - To know how to access and implement the procedures in this Policy, independently if necessary
 - To keep a sufficient record of any concerns, discussions and decisions in accordance with this Policy
 - To report any matters of concern in accordance with this Policy
 - To work with and support social workers following a referral of a pupil to children's social care.

- The Governing body ensures that:
 - There are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children’s welfare
 - The School’s safeguarding arrangements take into account the procedures and practice of the OSCB, including understanding and reflecting local protocols for assessment and the referral threshold document. In particular the School follows the procedures set out in the OSCB Interagency Procedures manual
 - The School contributes to interagency working, including providing a co-ordinated offer of early help when additional needs of children are identified and support to children subject to child protection plans
 - The School is prepared to supply information as requested by the LSPs
 - The School will be fully engaged, involved and included when working with LSPs and understand that they have a statutory duty to co-operate with published arrangements when named as a relevant agency.

- The Head will ensure that the policies and procedures adopted by the Governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.

- The Governing Body is responsible for proper oversight of the School’s safeguarding arrangements and has nominated one of its members to take leadership responsibility in this role. The Nominated Safeguarding Governor is Ruth Reavley whose contact details are set out in the School contacts list at the front of this Policy.

- The Governing Body will ensure that information sharing processes and principles are in place in School and also with LSPs and other organisations, agencies and practitioners, which proactively identify, assess and respond to any risks about the safety and welfare of the pupils. Relevant staff also have due regard to data protection principles and are confident of processing conditions under GDPR. They are also aware that the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information.

- The Governing Body will ensure that staff induction and training is in line with advice from LSPs (as laid out below).

6. Training

- All training will be carried out in accordance with OSCB procedures.

- **Induction**
 - All staff, including temporary staff and volunteers, will be provided with induction training that includes:

➤ This Policy

- The School Staff Handbook containing the Code of Conduct, the Whistleblowing Policy, the Behaviour Policy, e-Safety Policy and IT Acceptable Use Policy (Staff)
- The role of the DSL, his identity and contact details together with that of his Deputies
- Child protection training in accordance with OSCB procedures, including Prevent Training and guidance on managing a report of peer-on-peer harmful sexual behaviour
- The safeguarding response to children who go missing from education
- Online safety training; reporting on CPOMS (video)
- A copy of Part 1 and, where appropriate, Annex A of KCSIE.

- **Child protection training**

- All staff including the Head will receive a copy of this Policy and Part 1 and where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these
- The Head and all staff members will undertake appropriate child protection training which will be updated every three years and following consultation with the Oxfordshire Safeguarding Children Board.
In addition, all staff members will receive safeguarding and child protection updates via email, e-bulletins and staff meetings on a regular basis and at least annually, in line with the School Safeguarding Training Schedule
- Staff development training will also include training on online safety and Prevent training assessed as appropriate for them by the School.
Members of staff should have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups to encourage and legitimise terrorist activity. Staff should have sufficient training to be able to recognise this vulnerability, to understand that it could happen here and to be aware of what action to take in response. This will include how to make a referral, using CPOMS (Safeguarding & Child Protection Software for Schools) or directly to the DSL, and where to get additional advice and support
- Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe
- All Governors receive safeguarding training on induction. The Nominated Safeguarding Governor and the Chairman of Governors will receive appropriate training to enable them to fulfil their safeguarding responsibilities
- The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant skills and knowledge to safeguard children effectively, including online training, inset and bespoke training. This includes information on how staff can report concerns occurring out of hours/out of term time and should where appropriate refer to the School's risk assessment for out of hours/out of term safeguarding arrangements.

- **Designated Safeguarding Lead**

- The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role which includes inter agency working in line with the OSCB and regular updates. This training also includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Appendix 1
- Prevent duty training will be consistent with Home Office Workshop to Raise Awareness of Prevent (WRAP).

- **Teaching pupils about safeguarding**

- The School teaches pupils about safeguarding through the curriculum and Personal, Social, Health and Economic Education (PSHE), themed Chapels, including guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help
- Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through PSHE education appropriate to their age and stage of development
- Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes for reporting a concern about a friend or peer, and how any report will be handled. The School's concerns and complaints procedure for pupils sets out in writing what pupils should do if they have a worry or complaint
- The safe use of technology is a focus in all areas of the curriculum and key Information and Communication Technology (ICT) safety messages are reinforced as part of assemblies and tutorial/pastoral activities. The School has appropriate filters and monitoring systems in place (see the School's e-Safety Policy) and is mindful that this should not lead to unnecessary restrictions on learning.

7. Risk assessment

- Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

- The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.
- Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

8. Procedures

- The child protection training provided to staff considers the types and signs of abuse and neglect staff must be aware of. The types of abuse and neglect and examples of specific safeguarding issues are set out in Appendix 2.
- Staff should refer to the guidance in Appendix 3 in the event of receiving a disclosure from a child and for guidance about recording concerns.
- Staff members working with children should 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.
- Staff should also be aware of the risks of peer-on-peer abuse and refer to the Government guidance ‘Sexual violence and sexual harassment between children in schools and colleges’ which can be found at the following link:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf.
- **If staff are ever unsure, they must always speak to the DSL.**
- **Early help**
 - The School understands that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years to the teenage years
 - Children who are in need of early help can be drawn into anti-social or criminal behaviour; frequently missing school or from home, at risk of modern slavery, trafficking or exploitation, show early signs of abuse, at risk of radicalisation or are privately fostered
 - The School’s safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:
 - Is disabled and has specific additional needs

- Has special educational needs (whether or not they have a statutory education, health and care plan)
 - Is a young carer
 - Is showing signs of being drawn in to anti-social or criminal behaviour including gang involvement and association with organised crime groups
 - Is frequently missing/goes missing from care or from home
 - Is misusing drugs or alcohol themselves
 - Is at risk of modern slavery, trafficking or exploitation
 - Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
 - Is looked after or has returned home to their family from care
 - Is showing early signs of abuse and/or neglect
 - Is at risk of being radicalised or exploited
 - Is a privately fostered child.
- A member of staff or volunteer who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the OSCB referral threshold document and will support staff in liaising with other agencies and setting up an interagency assessment as appropriate
 - If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

- **Concerns about a pupil's welfare**

- KCSIE (2018) identify four types of abuse which include physical abuse, emotional abuse, sexual abuse and neglect. Further information on this can be found via the DSL or the OSCB website <http://www.oscb.org.uk/themes-tools/>.
- Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. If a member of staff is concerned about a pupil's welfare, the matter should be reported to the DSL as soon as possible. See paragraph **Dealing with allegations against teachers, the Head, Governors, volunteers and other staff** on Page 15 and Appendix 4 for the procedures for dealing with allegations against staff and volunteers. Under the Children Act 1989, a 'child in Need' is defined as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services, or a child who is disabled. (Section 17) Local authorities are required to provide support and services to all children in such circumstances.
- On being notified of a concern the DSL will consider the appropriate course of action in accordance with the OSCB referral threshold document. If any emerging concerns do not require an immediate safeguarding response, the DSL will make contact with LCSS (Locality & Community Support Service) for advice. If it is decided that a referral is not required, the DSL will keep the matter under review and consideration given to a referral to children's services if the pupil's situation does not appear to be improving

- Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism
 - In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral to children's services. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible
 - Staff should be aware that the General Data Protection Regulation (GDPR) is not a barrier to justified information sharing in relation to safeguarding concerns and must not stand in the way of the need to promote the welfare or safety of our pupils. Staff should refer to the seven golden rules for sharing information contained in 'Information Sharing' (July 2018) which can be found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf.
- **If a child is in immediate danger or at risk of harm**
 - If a pupil is suffering or likely to suffer significant harm (Section 47), local authorities are required to make enquiries in order to decide whether any action is required to safeguard the pupil. If a pupil is in **immediate** danger or is at risk of harm, a referral should be made to MASH and/or the police immediately
 - Anybody can make a referral in these circumstances. See paragraph **Making a referral** on Page 15 for making a referral
 - If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible. If the DSL is not available, then the member of staff should notify any of the Deputy DSLs with their concerns. If no member of the safeguarding team is available, the member of staff should notify the Head.
- **Female Genital Mutilation (FGM)**
 - Teachers must report to the police known cases of FGM in under 18s. Although all members of staff should speak to the DSL about concerns regarding FGM, there is a special legal duty on teachers to report concerns about any acts of FGM on a girl under the age of 18 to the police. See Appendix 2 for further information about FGM and this reporting duty.
- **Making a referral**
 - Staff required to make a direct referral may find helpful the flowchart set out on Page 13 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decision required
 - Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

- Personal details of the child including the child’s developmental needs
 - Detailed information about the concern
 - Information about the child’s family and siblings including the capacity of the child’s parents or carers to meet the child’s developmental needs and any external factors that may be undermining their capacity to parent.
- The relevant contact information is set out at the front of this Policy. If the referral is made by telephone, this should be followed up in writing
 - Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children’s social care again. For further information on the referral process, see Page 13 of KCSIE (2018)
 - If after a referral the pupil’s situation does not appear to be improving, the DSL (or the person that made the referral) should follow the local escalation procedures to ensure their concerns are addressed and that the pupil’s situation improves. Additional details regarding OSCB protocols and procedures can be found at <http://www.oscb.org.uk/wp-content/uploads/OSCB-Local-Assessment-Protocol1.pdf>.
 - Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.
- **Dealing with allegations against teachers, the Head, Governors, volunteers and other staff**
 - If a member of staff has a safeguarding concern, or an allegation is made about a member of staff (including volunteers) posing a risk of harm to children, then this should be referred immediately to the Head. In the event that there are concerns about the Head, then the matter should be referred to the Chairman of Governors
 - The School has procedures that 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, which are set out in Appendix 4.
 - The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s)). The Designated Officer(s) will be informed immediately and in any event within one working day of all such allegations that come to the School’s attention and appear to meet the criteria set out in paragraph 1 of Appendix 4
 - Detailed guidance is given to staff, Governors 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.

The guidance is contained in the School Staff Handbook which is available on the Google Team Drive or from the Bursar or HR Manager, and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils

- Staff and volunteers should also feel able to follow the School's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly safeguard the welfare of pupils, and that such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details)
- The School will preserve records which contain information of allegations of sexual abuse for IICSA for the term of any inquiry. All other records about allegations against staff will be retained until the accused has reached pensionable age, or a period of 10 years from the date of the allegation if that is longer.

- **Allegations against pupils – peer on peer abuse**

- The conduct of pupils towards each other will, in most instances, be covered by the School's behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised. Examples of behaviour by a pupil which may raise safeguarding concerns may include:
 - Violence, including gender based violence
 - Physical abuse such as hitting kicking, shaking, biting, hair pulling or otherwise causing physical harm
 - Threatening or intimidating behaviour
 - Blackmail
 - Sexual violence and sexual harassment
 - Sexting (see the School's Behaviour Policy for the School's approach to sexting)
 - Any form of inappropriate behaviour by an older pupil towards a younger or more vulnerable pupil, particularly when the older pupil has reached the age of 18.
 - Bullying, including cyberbullying, initiation/hazing type violence and rituals.
- The School takes steps to minimise the risk of peer on peer abuse. The School has robust anti-bullying procedures in place (see the School's Anti-bullying Policy) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and appropriate action taken to protect pupils identified as being at risk including risks arising from behaviour in boarding houses (see the School's Risk Assessment Policy and Guidance and Boarding Handbook)
- Abusive behaviour by pupils must be taken seriously.

Behaviour should not be dismissed as being normal between young people, as “banter” or simply “part of growing up”. Behaviour such as initiation violence or any form of sexual harassment is not acceptable

- If a crime has been committed against a pupil by another pupil (which can include sexting), if criminal activity against another pupil has been alleged or if there is a reasonable cause to suspect that a pupil is suffering or in immediate danger of significant harm, then the school will follow safeguarding procedures including referrals to the Police, MASH or the Designated Officers (see also ‘Anti-bullying Policy’, Early help, Concerns about a pupil’s welfare, and if a child is in immediate danger or at risk of harm). Both the perpetrator and the victim are treated as ‘at risk’ in sexting cases
- A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School’s policy on behaviour, discipline and sanctions will apply. The School will take advice from children’s services 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
- 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 children’s social carer, the pupil’s parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. 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
- Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

- **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 Head, the Designated Officer(s), MASH and/or the police before discussing details with parents. In all cases, the DSL will be guided by the OSCB referral threshold document
- In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared.
Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public
- When there is a safeguarding concern, the School will ensure that the child’s wishes and feelings are taken into account as to what actions are taken, what services are provided and with whom information is shared. Ultimately, the process will operate in the best interests of the child

- See also section 3 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Head of the School.

- **Contextual Safeguarding**

- Safeguarding incidents are often related to external factors and can occur between children outside of the School. All staff (especially the Safeguarding team) need to consider all external factors when incidents take place. Thus, assessments can be made as to whether there are wider environmental factors present in a child's life which are a threat to their safety or welfare.

9. Additional Reporting

- In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation including but not limited to:
 - **Health and Safety Executive.** The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy
 - **Charity Commission.** The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance How to report a serious incident in your charity (Charity Commission September 2017)
 - Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils. This is likely to involve the following:
 - Pupils have been, or are alleged to have been, abused or mistreated while under the care of the School or by someone connected with the School, for example a Governor, staff member or volunteer
 - There has been an incident involving the abuse or mistreatment (alleged or actual) of someone and this is connected with the activities of the School
 - There has been a breach of the School's procedures or policies which has put pupils at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children.
 - The School will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy
 - **Insurers.** The School consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies
 - Care should be taken to ensure this is done before to ensure that the School complies with its duties under the Insurance Act 2015.

If the School is in any doubt with regard to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought

- **Boarding Schools Association (BSA).** The School will report to the BSA all safeguarding cases which have resulted in a referral to an external body and which involve allegations against staff or peer on peer abuse.

10. Use of mobile phones and cameras

- The School's policy on the use of mobile phones and cameras in the School, is as follows:
 - The School's e-Safety Policy sets out the expectations on pupils in conjunction with the IT Acceptable Use Policy (Pupils, Parents and Visitors)
 - Staff and volunteers should use mobile phones and cameras in accordance with the guidance set out in the e-Safety Policy, School Staff Handbook and Capture and Use of Photographic and Video Images of Pupils Policy
 - Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

11. Record keeping, confidentiality and information sharing

- All concerns, discussions and decisions made and the reasons for those decisions should be recorded on CPOMS.
- Staff must record all concerns about a child on CPOMS. Guidance on record keeping is set out in Appendix 3.
- The DSL will open a child protection file following a report to him/her of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.
- The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children.
- The School will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989.
- Where allegations have been made against staff, the School will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

12. Monitoring and review

- The DSL will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.
- Any child protection incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Governing Body. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.
- The full Governing Body will undertake an annual review of this Policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of interagency working. The DSL will work with the Nominated Safeguarding Governor, preparing a written report commissioned by the full Governing Body. The written report should address how the School ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.
- The full Governing Body should also consider independent corroboration, such as inspection of records or feedback from external agencies including the Designated Officer(s). The full Governing Body will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval. Detailed minutes recording the review by the Governing Body will be made.

Appendix 1 Designated Safeguarding Lead (DSL)

1. The DSL for the School site is, Rob Jones, Second Deputy, who may be contacted on 01608 658999 and 01608 698964.
2. The Deputy DSLs are Jill Gordon and Dan Chambers who may be contacted on 01608 658999. Catriona Thompson, Deputy DSL can also be contacted on 01608 658999 and 07340-789258 (out of term time).
3. In accordance with Annex B of KCSIE, the main responsibilities of the DSL are:

- **Managing referrals**

- The DSL is expected to:
 - Refer cases of suspected abuse to LADO, MASH or LCSS as required
 - Support staff who make referrals to LADO, MASH or LCSS as required
 - Refer cases to the Channel programme where there is a radicalisation concern as required
 - Refer any child who is missing education to the Oxfordshire Pupil Tracking Officer in line with statutory guidance
 - Support staff who make referrals to the Channel programme
 - Refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required
 - Refer cases where crime may have been committed to the Police as required.
 - Organise the transfer of safeguarding files
 - Be the Designated Teacher in the case of 'Looked after Children' and 'previously Looked after Children' and thus be responsible for promoting the educational achievement of these children.

- **Work with others**

- Liaising with the Head to inform him/her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the Case Manager (see Appendix 4 of this policy) and the Designated Officer(s) at the local authority for child protection concerns (all cases which concern a staff member)
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs/named person with oversight of SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

- **Raise awareness**

- The DSL should ensure this Policy is known, understood and used appropriately
- Ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this
- Ensure this Policy is available publicly
- Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the School's role in this
- Maintain links with the OSCB to ensure staff are aware of training opportunities and the local policies on safeguarding.

- **Child protection file**

- Where children leave the School the DSL shall ensure their child protection file is copied for any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained
- In addition, the DSL will consider if it is appropriate to share any information with the new school or college in advance of a child leaving
- On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCO/named person with oversight for SEN.

- **Prevent**

- In accordance with the *Prevent duty Guidance for England and Wales and Channel duty guidance: protecting vulnerable people from being drawn into terrorism* (2015) the DSL has, in addition, the following responsibilities:
 - Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty
 - Co-ordinating Prevent duty procedures in the School
 - Liaising with local prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated
 - Undergoing WRAP or other appropriate training
 - Maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training
 - Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

4. The Deputy DSL will carry out this role where the DSL is unavailable.

5. The DSL and the Deputy DSL have undertaken training to provide them with the knowledge and skills required to carry out the role which includes inter agency working in line with the OSCB and regular updates.

This training also includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, 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 concern and referrals.
- Understand and support the School with regard 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.
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- 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 may put in place to protect them.

Appendix 2 Types and signs of abuse and specific safeguarding issues

1. Types of abuse

- Abuse is 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 another child or children.
- Part 1 of KCSIE defines the following types of abuse, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.
- **Physical abuse.** 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.
- **Emotional abuse.** 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.
- **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, Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

- **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. 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.

2. Signs of abuse

- Possible signs of abuse include, but are not limited to:
 - The pupil says he/she has been abused or asks a question or makes a comment which gives rise to that inference
 - There is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries
 - The pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour
 - The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
 - The pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing
 - The pupil appears neglected, eg dirty, hungry, inadequately clothed
 - The pupil is reluctant to go home, or has been openly rejected by his/her parents or carers
 - Inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- The OSCB can provide advice on the signs of abuse and the DfE advice **What to do if you're worried a child is being abused** (2015) provides advice in the identifying child abuse. The **NSPCC website** is also a good source of information and advice.

3. Specific safeguarding issues

- Statutory guidance acknowledges the following as specific safeguarding issues:
 - Children and the court system
 - Children missing education (See paragraph **Children missing education** on Page 26)
 - Children with family members in prison
 - Child sexual exploitation (See paragraph **Child sexual exploitation** on Page 26)
 - Child criminal exploitation: county lines

- Domestic violence
 - Homelessness
 - So called “honour-based violence”
 - Preventing radicalisation (See paragraph **Radicalisation and the Prevent duty** on Page 28)
 - Peer on peer abuse
 - Sexual violence and sexual harassment between children in schools and colleges.
- **Children missing education**
 - Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about his/her welfare
 - Where reasonably possible the School will hold more than one emergency contact for each pupil
 - The School shall inform the local authority of any pupil who is going to be added to or deleted from the School’s admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended)
 - This will assist the local authority to:
 - Fulfil its duty to identify children of compulsory school age who are missing from education
 - Follow up any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.
 - The School shall inform the Oxfordshire County Pupil Tracking Officer of any pupil who:
 - Fails to attend School regularly, or
 - Has been absent without the School’s permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).
 - School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this Policy if any absence of a pupil from the School gives rise to a concern about his/her welfare.
- **Child sexual exploitation (CSE)**
 - Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- In exchange for something the victim needs or wants
 - 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 and can also occur through the use of technology. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.
- **Honour-based violence**
 - All forms of so called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving “honour” often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts
 - If appropriate the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children’s services.
 - **Female genital mutilation (FGM)**
 - FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences
 - There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 **Multi-agency statutory guidance on FGM** (pages 59-61 focus on the role of schools)
 - All staff must be aware of the requirement for teachers 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. The report should be made orally by calling 101, the single non-emergency number. 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s social care as appropriate
 - If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance **Mandatory reporting of female genital mutilation – procedural information** for further details about the duty

- Guidance published by the **Department of Health** also provides useful information and support for health professionals which will be taken into account by the School's medical staff.
- **Forced marriage**
 - Forcing a person into 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
 - Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the **Multi-agency guidelines: handling case of forced marriage**
 - Staff should speak to the DSL if they have any concerns. Pages 33-36 of the **Multi-agency guidelines: handling case of forced marriage** focus on the role of schools in detecting and reporting forced marriage and the forced marriage unit can be contacted on 020 7008 0151 or fmufco.gov.uk for advice and information.
- **Radicalisation and the Prevent duty**
 - The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism
 - The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments
 - The School has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism. "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"

Radicalisation. "The process by which a person comes to support terrorism, and forms of extremism leading to terrorism"

- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet)
- It is possible to prevent vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. 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. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel
- **Channel duty guidance: protecting vulnerable people from being drawn into terrorism** (2015) notes the following:

"36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances

51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to accord with the group
- Day-to-day behaviour increasingly centred around an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (eg the swastika for far right groups)
- Attempts to recruit others to the group/cause/ideology
- Communications with others that suggest identification with a group/cause/ideology.

52. Example indicators that an individual has an intention to cause harm, use of violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- Using insulting or derogatory names or labels for another group
- Speaking about the imminence of harm from the other group and the importance of action now

- Expressing attitudes that justify offending on behalf of the group, cause or ideology
 - Condoning or supporting violence or harm towards others
 - Plotting or conspiring with others.”
- Protecting children from the risk of radicalisation is part of the School’s wider safeguarding duties, and is similar in nature to protecting children from other harms (eg drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences
 - The DfE’s briefing note **The use of social media for on-line radicalisation** (2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

4. Peer on peer abuse

- The conduct of pupils towards each other will, in most instances, be covered by the School’s behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised.
- Safeguarding issues can manifest themselves via peer on peer abuse. This includes but is not limited to:
 - Bullying (including cyber-bullying)
 - Physical abuse such as hitting, kicking, shaking biting, hair pulling, or otherwise causing physical harm
 - Harmful sexual behaviour
 - Sexting (also known as youth produced sexual imagery)
 - Initiation/hazing type violence and rituals.
- Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the School recognises the gendered nature such behaviour can take. Harmful sexual behaviour, like all peer on peer abuse, is never acceptable and will be taken seriously.
- The School takes steps to minimise the risk of all types of peer on peer abuse. The School has robust anti-bullying procedures in place (see the School’s Anti-bullying Policy) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including [risks arising from behaviour in boarding houses and the particular vulnerabilities of those with a special educational need or disability (see the School’s Risk Assessment Policy and Guidance for pupil welfare)].
- Abusive behaviour by pupils must be taken seriously.

- Behaviour should not be dismissed as being normal between young people, as “banter” or simply “part of growing up”. Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

5. Sexual violence and sexual harassment of children

- Sexual violence and sexual harassment can occur between two or more children of any age or sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The School will respond to allegations seriously and all victims will be offered appropriate support.
- The School is aware of the importance of:
 - Making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
 - Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
 - Challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.
- Reference to **sexual harassment** mean “unwanted conduct of a sexual nature” that can occur online and offline. In the context of child on child sexual harassment, it is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment.
- The DfE guidance Sexual violence and sexual harassment between children in schools and colleges provides further detailed advice.

6. Sexting

- “Sexting” means the taking and sending or posting of images or videos of a sexual or indecent nature, usually through mobile picture messages or webcams over the internet.
- The School treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.

- Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.
- The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:
 - It is the only way to make a decision whether to involve other agencies as there is insufficient information available as to its contents
 - It is necessary to report the image to a website or agency to have it taken down
 - A pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.
- Where viewing an image is unavoidable:
 - Viewing should take place on School premises wherever possible
 - The image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known)
 - A senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image
 - Full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it
 - Any member of staff who views an indecent image should be given appropriate support.
- If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.
- If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
- If images have been shared online and cannot now be deleted by the person who share them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the internet Watch Foundation or ChildLine (if the website does not provide this option).
- Where a pupil receives unwanted images, the School should advise the pupil and his/her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

- The UK Council for Child Internet Safety’s advice note Sexting in schools and colleges: responding to incidents and safeguarding young people (August 2016) contains details of support agencies and provides further information for schools on how to respond to incidents of sexting.
- The College of Policing has also produced a briefing note Police action in response to youth produced sexual imagery (“sexting”) (November 2016) which provides information on how police forces treat instances of sexting by young persons.

7. Special educational needs and disabilities

- The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School’s curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School’s policy on Special Educational Needs and Disabilities (SEND) Policy.
- Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:
 - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil’s special educational need or disability without further exploitation
 - Being more prone to peer group isolation than other children
 - Pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs
 - There may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

8. Looked after children and previously looked after children

- The Governing Body ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child’s looked after legal status, for example:
 - Whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order
 - Contact arrangements with birth parents or those with parental responsibility
 - Information about a child’s care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.
- The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

Appendix 3 Guidance for staff and volunteers on suspecting or hearing a complaint of abuse or neglect

1. Receiving a disclosure

- A member of staff or volunteer suspecting or hearing a complaint of abuse or neglect:
 - Must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place
 - Must not ask leading questions, ie a question which suggests its own answer
 - Must reassure the child but not give a guarantee of absolute confidentiality The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken
 - Must keep a sufficient record of the conversation. The record should include:
 - The date and time
 - The place of the conversation
 - The essence of what was said and done by whom and in whose presence
 - And must be signed by the person making it, using names and not initials.
 - All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record (see below) and passed on when reporting the matter in accordance with this Policy.

2. Recording the concern

- Staff must record all concerns about a child on CPOMS and should include a description of the concern.
- This information will then be included in the child protection log which is managed and actioned by the DSL and Deputy DSL.

Appendix 4 Dealing with allegations against teachers, the Head, Governors, volunteers and other staff

1. The School's procedures

- The School's procedures for dealing with allegations made against staff will be used where the teacher, the Head, Governor, volunteer or other member of staff has:
 - Behaved in a way that has harmed a child, or may have harmed a child
 - Possibly committed a criminal offence against or related to a child
 - Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children.
- Any allegations not meeting this criteria will be dealt with in accordance with the OSCB procedures. Advice from the Designated Officer will be sought in borderline cases.
- All such allegations must be dealt with as a priority without delay. The Designated Officer (s) will be informed immediately and in any event within one working day of all allegations that come to the School's attention and appear to meet the criteria above (under first bullet point).
- Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

2. Reporting an allegation

- The reporting requirements for allegations against a teacher, the Head, Governor, volunteer or other member of staff are set out below. In all cases, the member of staff making the allegation may consider discussing his/her concerns with the DSL and making a referral via him/her. The only circumstances in which this would not be appropriate is if the allegations is against the DSL.
- Where an allegation or complaint is made against any member of staff (other than the Head), the DSL or a volunteer, the matter should be reported immediately to the Head. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Head will consult with the DSL.
- Where an allegation or complaint is made against the Head, the matter should be reported immediately to the Chairman of Governors or the Nominated Safeguarding Governor, without first notifying the Head. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. The Chairman of Governors will consult the Nominated Safeguarding Governor, and vice versa.
- Where an allegation is made against any Governor, the matter should be reported immediately to the Chairman of Governors or the Nominated Safeguarding Governor. If either the Chairman of Governors or the Nominated Safeguarding Governor are the subject of an allegation, the matters should be reported to the other.

The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Chairman of Governors will consult the Nominated Safeguarding Governor and vice versa.

- If it is not possible to report to the Head or Chairman of Governors or Nominated Safeguarding Governor in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chairman of Governors and the Nominated Safeguarding Governor.
- The person taking action in accordance with the procedures in this Appendix is known as the “Case Manager”.

3. Disclosure of information

- The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.
- The Parents or carers of the child/children involved will be informed of the allegations as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- Where the Designated Officer(s) advises that a strategy discussion is needed, or the police or children’s social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4. Further action to be taken by the School

- A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part 4 of KCSIE and the School’s employment procedures.
- Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

5. Ceasing to use staff

- If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service (DBS) will be made promptly if the criteria for a referral are met. 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.
- If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral to the Disclosure and Barring Service will be made promptly if the criteria for referral are met.
- Separate considerations will be given as to whether a referral to the National College for Teaching and Leadership should be made where a teacher has been dismissed, or would have been dismissed had he/she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

6. Malicious allegations

- Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.
- Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.
- Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

7. Record keeping

- Details of allegations found to be malicious will be removed from personnel records.
- For other allegations, full details will be recorded on the confidential personnel file of the person accused.
- An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all be found to be false, unsubstantiated or malicious will also not be included in any reference.

- The School will retain all safeguarding records and relevant personnel records for so long as reasonably required.

This policy was ratified on

and will be reviewed June 2019

Signed by the Chairman of Governors

Reviewed and updated by Rob Jones, Andrew Evans and Magnus Eyles (June, August and September 2018)