

SAFEGUARDING POLICY

*Revised July 2015, August 2015, January 2016, August 2016, June 2017, December 2017, May 2018, September 2018.
Further amendments may be necessary as new guidance is published– the latest version will be on Firefly and the website.*

Introduction for Parents

The law and KCSIE defines someone as a child until they are eighteen years old.

Schools and their staff form part of the wider safeguarding system for children, to protect 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. Risks of harm include e.g. drugs, alcohol, gangs, neglect, abuse, sexual exploitation, sexting, female genital mutilation, risk of radicalisation), whether these come from within their family or are the product of outside influences. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centered. This means that they should consider, at all times, what is in the **best interests** of the child. Everyone has the right to protection from abuse regardless of gender, race, disability, sexual orientation, religion/ beliefs, pregnancy/ maternity and gender reassignment.

Children from all types of background may be abused physically, emotionally, sexually or through neglect. It is not always easy to recognise or accept that abuse is happening. If you have concerns about a child you should contact Social Services, the Police or the NSPCC.

Sometimes parents or pupils tell us that they believe a child is being abused; a pupil might tell us themselves or their behaviour changes in a way that means they could be being abused. If this happens we have a legal duty to tell Social Services of any concerns we have of possible child abuse. In some cases we can talk to the family but you may first hear from Social Services. We understand that this would be upsetting, but in certain circumstances we are required to contact Social Services not the family.

The Pastoral Deputy Head is responsible for dealing with concerns about child welfare. Our policy is on the school's website and is based on *Working Together to Safeguard Children* (July 2018) (WTSC) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf, What to do if you are worried a child is being abused – Advice for Practitioners and *Keeping Children Safe in Education* (KCSIE) (September 2018) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/737289/Keeping_Children_Safe_in_Education_Sept_2018.pdf, section 26 of the Counter-Terrorism and Security Act 2015 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417943/Prevent_Duty_Guidance_England_Wales.pdf and https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/512906/Multi_Agency_Statutory_Guidance_on_FGM_-_FINAL.pdf

Policy for Staff

Introduction

Staff should at all times maintain a professional relationship with our pupils. The school enjoys a reputation for close and happy relationships between staff and pupils; but common sense, as well as legal and procedural guidance requires staff to maintain a proper professional detachment from all pupils including those who are over the age of 18. Staff need to be aware of the national increase in the number of reported allegations by pupils of abuse or professional misconduct by teachers.

The policy has been developed in accordance with *Working Together to Safeguard Children* (July 2018) (WTSC), *Keeping Children Safe in Education* (September 2018) (KCSIE), *Boarding Schools' National Minimum Standards* (2015), and *Kent and Medway Safeguarding Children Handbook* (KSCB and Medway Safeguarding Children Board,), *Prevent Duty Guidance* (March 2015) and *FGM Guidelines*.

The Children Act (1989) defines 'children in need' as those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired without the provision of services of the Act. This includes those who are suffering or likely to suffer significant harm. A person, usually known to the young person (parent, carer or person in institutions or community settings or another child) may abuse or neglect a child by inflicting harm or failing

to act to prevent harm. Children with SEN or disabilities may be particularly vulnerable. This policy gives the procedure to be followed:

- (a) for the management of safeguarding.
- (b) if a staff member suspects a child is being neglected/abused or at risk of being drawn into extremism, or a pupil makes a disclosure
- (c) to assist staff to protect themselves from criticism or accusations of malpractice which could potentially damage their careers.
- (d) if allegations are made of misconduct by staff or volunteer.
- (e) for appointing new staff or volunteers, and arranging for visits by non-staff.

It should be read in conjunction with the Anti-Bullying Policy, Behaviour Policy, Missing Pupil Policy, Staff Code of Conduct, Physical Restraint Policy, Whistle Blowing Policy, Intruder Policy, NMS and PSHE policy.

Types of abuse and neglect (from KCSIE)

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.

- **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 another child or children.
- **Physical Abuse**
A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to the 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 or 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 to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill-treatment 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 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.
- **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, shelter and clothing (including exclusion from home or abandonment), failing to protect a child from physical or emotional harm or danger, failing to ensure adequate supervision (including the use of inadequate care-givers) or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

□ **Child sexual exploitation (CSE)**

Involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

A child may suffer, or be at risk of suffering, from one or more types of abuse and abuse may take place on a single occasion or may occur repeatedly over time. In all cases the Child in Need/Child Protection Procedure should be followed, or that of the authority in which the child is normally resident.

A summary copy of Kent's procedure is kept by the Pastoral Deputy; the full document is available on-line: www.kscb.org.uk Information can also be found on the Kent Trust Children's Safeguards Service website: http://www.kenttrustweb.org.uk/Children/safeguards_home.cfm

Signs of abuse and neglect (NSPCC)

PHYSICAL ABUSE

Determining whether an injury is accidental or non-accidental is a skilled job. It requires a full assessment of the injury, explanation, history and circumstances. This is not the role of a teacher.

There are, however, a number of injuries which should be regarded with concern and may indicate a non-accidental cause. Some may need medical assessment and treatment, occasionally urgently. Injuries need to be accounted for.

Inadequate, inconsistent, or excessively plausible explanations, or a delay in seeking treatment for the child, should signal concern.

Physical indicators

- Unexplained injuries or burns, particularly if they are recurrent
- Untreated injuries or lingering injuries not attended to
- Bruises and abrasions around the face, particularly if they are recurring
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft areas of the face, e.g. cheeks
- Bite marks
- Burns or scalds (note the pattern and spread of the injury, e.g. cigarette burns)
- Wheals suggesting beatings

Behavioural indicators

- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Shrinks from physical contact
- Refusal/avoiding getting undressed for gym – keeps arms and legs covered in hot weather
- Fears medical help
- Self-harming behaviours

- Aggression towards others
- Over compliant behaviour or a 'watchful' attitude
- Deterioration in school work
- Unexplained pattern of absences which may serve to hide bruises or other physical injuries
- Fears or is reluctant to return home or to have parents contacted

EMOTIONAL ABUSE

Emotional abuse is often the most difficult to detect.

A child might be clean and physically cared for but be emotionally neglected.

The parents' or carer's attitude to the child might be characterised by coldness, hostility, disinterest. They may resort to scape-goating or humiliating the child and the giving of age inappropriate responsibilities. They may give the impression that the child can never please, or may have expectations which are inappropriate, excessive or unrealistic.

Physical indicators

- Delays in physical development, e.g. milestones delayed for underweight, lethargic (there may be medical reasons for this, medical advice is essential)
- Self-mutilation

Behavioural indicators

- Delays in intellectual development
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Social isolation – does not join in and has few friends
- Extremes of compliance, passivity and/or aggression/provocativeness
- Compulsive stealing, e.g. other children's packed lunches
- Rocking, thumb sucking, hair twisting, etc.
- Drug, alcohol, solvent abuse
- Fear of parents being contacted

NEGLECT

Severe neglect is often characterised by the child being underweight, small in stature and with a poor physique. The care of neglected children is often poor and they present as unwashed, unkempt and inadequately fed and clothed (e.g. thin cotton dresses and plastic sandals in snow).

However, poverty, deprivation and neglect are not the same thing. Children may live in poverty but only a small number of these will be neglected. Assessment over time and with the help of other agencies is vital.

Physical indicators

Signs which may indicate neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Untreated medical problems

Behavioural indicators

- Social isolation – does not join in and has few friends
- Low self-esteem
- Frequent lateness or non-attendance at school
- Destructive tendencies
- Poor relationships with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking

SEXUAL ABUSE

Sexual abuse affects a child or young person emotionally and physically. It is difficult to detect as the physical indicators are not directly visible. Often the indicators that a child is being sexually abused are exhibited through behaviour. Sexual abuse occurs in every class, cultural and occupational group. Sexually abused children may take refuge in an appearance of normality, e.g. some children immerse themselves in schoolwork as a way of 'blinking out' the abuse.

Emotional and behavioural difficulties may result for example from abuse and neglect, physical or mental illness, sensory or physical impairment, or psychological trauma. In some cases emotional and behavioural difficulties may arise from or be exacerbated by circumstances within the school environment, for example, a change in teacher or routine.

(The Education of Children with Emotional and Behavioural Difficulties, Circular no. 9/94 DFEE 1994.)

Physical indicators

- 'Love bites'
- Other bite marks
- Self-harming behaviours (e.g. deep scratches/cuts on arms)
- Tiredness, lethargy
- Pregnancy or Sexually Transmitted Infections (STIs)

Behavioural indicators

- Sudden changes in behaviour and school performance
- Sexual awareness inappropriate to the child's age – shown for example in drawings, vocabulary, games, etc.
- Provocative sexual behaviour
- Frequent public masturbation
- Fear of undressing for gym
- Tendency to cry easily
- Regression to younger behaviour, e.g. thumb sucking, playing with discarded toys, acting like a baby
- Depression and withdrawal

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour. Young people who are being sexually exploited may:

- be involved in abusive relationships
- intimidated and fearful of certain people or situations
- hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- associate with other young people involved in sexual exploitation
- get involved in gangs, gang fights, gang membership
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- not know where they are, because they have been moved around the country
- go missing from home, care or education

They may also show signs of sexual abuse or grooming.

Other signs

Patterns of absence and prolonged absence may be indicators of safeguarding issues including sexual abuse and exploitation.

Safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm), sexual violence and sexual harassment, gender based violence, initiation/hazing type violence and rituals

Signs of radicalisation

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. 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.

Signs of Female Genital Mutilation

This is most likely to be identified through disclosures, but other indicators can be found here:

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

Management of Safeguarding

The Governors must read and comply with KCSIE, and ensure all staff read at least Part 1. They should ensure that mechanisms are in place to assist all staff to understand and discharge their role and responsibilities as set out in Part one of this guidance. Governors must ensure that the Safeguarding Policy is effective, in accordance with government guidance and LCSB interagency procedures, procedures are in place for appropriate responses to children who go missing from education particularly on repeated occasions and that the Staff Code of Conduct covers, amongst other things, acceptable use of technologies, staff/pupil relationships and communications including the use of social media. Governors must ensure that the ICT filters are appropriate and that pupils are taught about safeguarding through the curriculum. The Education Committee reviews internet safety, and the Pastoral Deputy Head reports at least annually to Governors on Safeguarding. The policy is reviewed at least annually and when there is any change in guidance such as KCSIE or following any safeguarding issue, and is approved and endorsed by the Governors each year. The Governor who takes a lead on safeguarding is Mrs Eliza Ecclestone.

The Designated Child Protection Co-Coordinator (DSL, formerly DCPC) is the Pastoral Deputy Head, Miss Helen Tebay. In her absence the Senior Deputy Head, Miss Theresa Homewood, and the Head of Sixth Form (Dr Matt Edwards), the Head of Middle School (Miss Rachel McQuillin) and a Middle School Divisional Head (Mr Alex Smith) are also DSLs. The DSL is the most likely person to have a complete safeguarding picture and to be the most appropriate person to advise on the response to safeguarding concerns. It is very unlikely that the DSL and all the deputy DSLs would be away, but if so a Deputy Head or the Head of Boarding should be consulted and/or take advice from local childrens' social care and inform the DSL as soon as possible.

The DSL is responsible for:

Managing referrals of pupils who have suffered or likely to suffer significant harm, and liaising with relevant agencies for pupils who need support through the Common Assessment Framework (CAF) and Team Around the Child (TAC) or the Channel guidance.

Refer all cases of suspected abuse to the local authority children's social care and:

- The Local Authority Designated Officer (formerly LADO now Designated Officer) for child protection concerns (all cases which concern a staff member).
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child).
- Police (cases where a crime may have been committed).
- Liaise with the Head to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Training

The DSL will obtain access to resources and attend any relevant or refresher training courses. The DSL should receive formal appropriate training carried out every two years, but in addition their knowledge and skills should be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role in order to:

- 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, and maintaining appropriate records.
- 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.
- Maintain up to date awareness of issues about safeguarding including FGM and risk of radicalisation. (DSL have also undergone on-line training)
- Ensure each member of staff has access to and understands the safeguarding policy and procedures, especially new and part time staff. All staff should know what to do if a child tells them they are being abused or neglected **All** staff members and volunteers will receive appropriate safeguarding and child protection training which is regularly updated. In addition all staff members will 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 and to be able to keep detailed, accurate, secure written records of concerns and referrals. All staff should be aware of the local early help processes and the process for making referrals to childrens' social care and understand their roles in these.
- All new staff and volunteers are given an induction on Safeguarding including the identity of the DSL(s), the school's policy and procedure for missing pupils and pupils missing education, that peer on peer abuse may occur including sexual violence and sexual harassment, that they have a responsibility to speak up about safeguarding and welfare matters within the school (and to external agencies where necessary), and provided with the staff code of conduct and whistle-blowing policies and a copy of KCSIE Part 1 and Annexe A. Through discussion in training and occasional questions we ensure that staff and volunteers know and understand KCSIE Part 1 and Annexe A.
- Those already in post in April 2014 and Governors were given a copy of KCSIE 2014 to read. KCSIE March 2015, July 2015 and September 2016 have also been issued via Firefly or as hard copy.
- All teaching staff in boarding, matrons and Divisional Heads have undertaken on-line Prevent training, and those in Houses with girls have had FGM training, and all teaching staff were given a briefing at the start of 2015-6.

Raising Awareness and Sharing Concerns

The DSL will 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. To remind staff of the need to maintain an attitude of **'it could happen here'** where safeguarding is concerned, and that when concerned about the welfare of a child, staff members should always act in the **best interests** of the child. All staff and volunteers have a responsibility to be alert to the behaviour of other adults working with children and must share any concern about the behaviour of another adult towards or around a pupil (including all staff members and volunteers) with the Designated Safeguarding Lead (see Code of Conduct). They must also share any concern about peer on peer abuse with the DSL.

The DSL should ensure the school's policies are known and used appropriately:

- Ensure the school's safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where children leave the school ensure their child protection file is copied for any new school as soon as possible but transferred separately and securely from the main pupil file and confirmation of receipt obtained. In addition to the child protection file, consider whether other information could help support the child in the new school in advance of the child protection file.
- To support previously looked after children

Procedures

General strategies:

The school is committed through the curriculum, co-curriculum and hidden curriculum to foster self-awareness, self-esteem, assertiveness and decision making of pupils to enable them to ensure their own well-being and that of others. Through open discussion, they are encouraged to voice concerns about themselves or others. In assemblies, talks, the core curriculum and PSHE pupils are given opportunities to learn about and consider challenging issues such as personal safety, on-line safety, grooming and extremism. All pupils in Y9 look at challenges to religion and misconceptions about Islam. Extremism and radicalisation are covered explicitly in Critical Perspectives (Y10), and are also covered in multiculturalism in 10 ideas (Y11). All Sixth Formers follow a Theory of Knowledge course (TOK); in cultural paradigms different perspectives, and in ethics the ability of reason to argue against extreme ethical premises are considered.

The School ensures that students have a range of appropriate adults who they feel confident to approach if they are in difficulty.

If a member of staff has any concerns about a child's welfare they should act on them and immediately see the DSL. The context within which incidents and/or behavior occur is important and should be considered and included in any referral. Options include using the school's pastoral support, early help assessment or a referral. The DSL will generally lead on liaising with other agencies for early help.

Early help

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has SEND
- is a young carer
- is showing signs of being drawn into anti-social or criminal behavior including gang involvement and association with organized 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
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalized or exploited
- is a privately fostered child

If a member of staff suspects any safeguarding issue or has concerns that a pupil is at risk of being drawn into extremism:

Inform the DSL who will consult with the Head and decide on the course of action. Confidentiality is of the utmost importance and must be maintained on a need to know basis.

Although the school has responsibilities under the Children Act to ensure the welfare of students in its care, the decision to take action to protect a young person is the responsibility of the "authorised agencies", i.e. the Social Services Department or Police.

The Area Safeguarding Adviser and Social Services Department are available for consultation to help clarify if there is any need for concern without having to identify the child. If the consultation process concludes a child has suffered, or is likely to suffer, significant harm, the Social Services Department will then probably request details of the child in order to make further enquiries to assess if any formal action should be taken.

If there are concerns that a child is at risk of being drawn into terrorism the Channel Guidance should also be consulted <https://www.gov.uk/government/publications/channel-guidance>

Other welfare issues such as bullying, pregnancy, substance misuse and inappropriate sexual behaviour may be associated with child protection matters. If in doubt staff should refer their concerns to the School

Counsellor or to the DSL who will initiate further consultation as appropriate. It is the duty of all staff to assist a child in need including making a referral to social services if needs be.

Any incident or behavioural change that gives cause for concern should be recorded and passed to the DSL so that an assessment can be made as to whether to access early help.

Children who go missing from education.

All absences are followed up by the tutor. Unexplained absences may be a safeguarding issue and must be reported to the DSL. The school usually holds home, mobile and work phone numbers of both parents. The school notifies the local authority when pupils leave the school before the age of 18 if the school does not know which school they are joining.

FGM

All staff must speak to the DSL about any concerns, but if a teacher discovers an act of FGM appears to have been carried out on a girl under the age of 18 the teacher **must** report this to the police.

If a pupil makes a direct allegation or disclosure:

- Reassure the pupil that they have been heard. The young person needs to know what will happen next (as far as the school is concerned) and should not be given any false reassurance that the matter can necessarily be kept confidential between the young person and staff member.
- Allow the child or young person to make the disclosure at their own pace and in their own way.
- Avoid interrupting except to clarify what the child is saying.
- Do not ask leading questions or probe for information that they do not volunteer.
- Use TED Tell (me...), Explain (what...), Describe (what...)
- Inform the DSL.

Kent Designated Officer advice:

The school is not an investigative agency and young people should not be physically examined or made to repeat their allegation to too many different people. This is the task of the Social Services Department and, if necessary, the Police.

A bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Abuse by one or more pupils against another where the pupil is suffering or likely to suffer significant harm will be referred to local agencies and it will be assumed that all the pupils involved are at risk

Record keeping and preparing evidence

Records should include: child's name, date of birth, the child's normal context e.g. behaviour and attitude, the incident(s) which give rise for concern with date(s) and time(s) and a verbatim record of what the child said. A form is available from the DSL and should be submitted a.s.a.p. and certainly within 24 hours. If recording bruising/injuries, the position, colour, size, and shape should be indicated on a body map. If evidence takes the form of inappropriate images these must never be printed off or forwarded (as that would constitute distribution).

The record should be dated and signed and forwarded to the DSL, who will retain it in a confidential file stored separately from the pupil's main school file. Good record keeping is essential in ensuring children's ongoing welfare and safety are promoted and monitored. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. The DSL will maintain a file of concerns and child protection records as recommended by Area Children's Officer (Child Protection). It is particularly important in the event of any subsequent prosecution or formal enquiry since in exceptional situations a staff member can be called as a witness and records used as evidence in a court case. All evidence, e.g. mobile phones containing text messages, laptops, and clothing must be presented.

Referrals

Staff must report to the DSL any concern or allegation about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. Although responsibility for appropriate action (liaison with LSCB, consultation with Social Services or formal referral as a matter of child protection concern) rests with the Head and the DSL, staff must contact social services or ISI (for boarders) directly, e.g. if

they felt it was urgent or they felt that a child protection concern already reported by them to the DSL was not being addressed, according to the normal school whistle blowing policy. Referrals must be made within 24 hours, but 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. The DSL must follow up any referrals, escalating if the response seems inadequate: If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

Allegations of Misconduct by Pupil, Staff, or Volunteers

All allegations must be reported straight away to the DSL. If an allegation is against a pupil, member of staff or volunteer there should be immediate consideration by the Head with the DSL as to how to proceed, taking advice from Local Area Designated Officer immediately. A referral must be made within twenty four hours. Where the allegation is against the DSL the Head would take over. Where the allegation is against the Head, the designated governor, Mrs Eliza Ecclestone or Chair of Governors, Mr Nicholas Gould, would take over. In the absence of the Head, the Senior Deputy Head would take over, and inform the Chair of Governors. Discussions should be recorded in writing, communications with the pupil(s) and parents, agreed and a decision taken as to whether suspension is appropriate. Every attempt must be made to maintain confidentiality and guard against unwanted publicity.

The school would follow the latest statutory guidance in KCSIE September 2018 Part Four including: Suspension pending investigation would not be automatic; a decision would be made in each individual case. If a member of boarding staff were suspended alternative arrangements for their accommodation would be made. Allegations found to be malicious would be removed from personnel records. Disciplinary action against pupil(s) making malicious allegations would be considered. Records of all other allegations would be kept but any that are not substantiated, are unfounded or malicious should not be referred to in employer references.

The school has a legal duty to refer to the DBS, PO Box 181, Darlington DL1 9FA: 01325 953 795 anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Compromise agreements cannot apply in this connection.. Referrals should be made as soon as possible after the resignation or removal of the individual. After such a referral has been made to the DBS regarding any professional misconduct, consideration must also be given to a Teaching Regulation Agency (TRA) referral. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral. <https://www.gov.uk/teacher-misconduct-regulating-the-teaching-profession>

Contact details

- DSLs: Pastoral Deputy Head Helen Tebay (HPT), Senior Deputy Head Theresa Homewood (TMH), Head of Sixth Form Matt Edwards (MTE), Head of Middle School Rachel McQuillin (RLM) and Middle School Divisional Head Alex Smith (ACS)
- Governor with responsibility for Child Protection, Mrs Eliza Ecclestone, and the Chairman of Governors, Mr Nicholas Gould, can be contacted via the Clerk to the Governors, Mrs Gail Jones, at Sevenoaks School.
- Central Duty: 03000 411111
For urgent child protection issues outside of office hours, please call the Central Duty Team out of hours number: 03000 419191
Early Help and Preventative Services: 03000 419222
LADO Team: 03000 410888
earlyhelp@kent.gov.uk
- Area Safeguarding Advisor for North Kent:
Robin Brivio
Worrall House, 30 Kings Hill Avenue, West Malling ME19 4AE
Office: 03000 412445
Mobile: 07740 183798

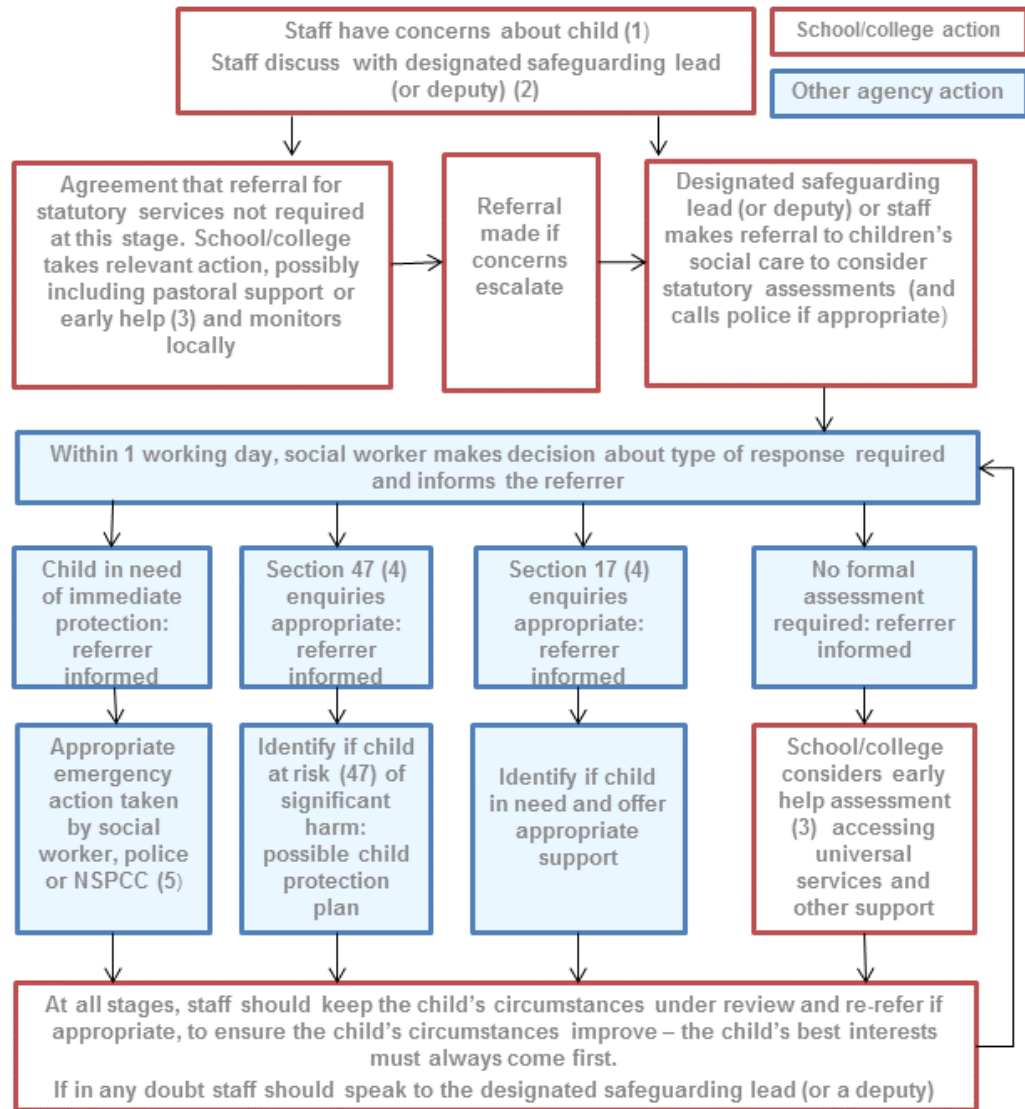
robin.brivio@theeducationpeople.org

PA, Rachel Unsworth:

Rachel.unsworth@theeducationpeople.org

- Central Referral Unit:
Kroner House, Ashford
Tel: 0300 3335647
- Social Services:
The Willows, Hilda May Avenue, Swanley BR8 7BY
Tel: 01322 6110000
- Social Services 24/7:
Tel: 0300 333 5433
- www.kcpc.org.uk (Kent Child Protection Committee)
- Independent Schools Inspectorate:
CAP House, 9-12 Long Lane, London, EC1A 9HA
- DfE contacts re extremism:
Tel: 020 7340 7264
counter.extremism@education.gsi.gov.uk.
- Kent Police:
Tel: 01622 690690 or 101
- 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 or email: help@nspcc.org.uk.

Actions where there are concerns about a child



Code of Conduct

It is the contractual duty of every member of staff and expectation of every volunteer (including governors) to observe the following rules and to behave at all times in a reasonable and respectful way towards staff, governors, contractors, visitors, volunteers, pupils and their parents or guardians. A breach of contract of these rules by staff will be treated as misconduct and will be liable to disciplinary action, up to and including dismissal. If a volunteer (including a governor) is in breach of them then they not be allowed to continue to volunteer at the School.

All staff and volunteers will work within the law.

Child Protection

The protection of children at the School is of paramount importance and all staff and volunteers are expected to behave in an appropriate manner towards pupils and other young adults on site, which will safeguard them against harm, including those over 18. It is an offence to have a sexual relationship with a pupil under 18, even if the pupil is over 16 and consents. Any sexual relationship with any current student would lead to dismissal/termination of the volunteer's role at the school. Any concerns, including about the behaviour of a member of staff or volunteer, must be reported to the Designated Safeguarding Lead. (Please also see the Child Protection, Social Media and Whistle Blowing Policies in the Staff Handbook).

The full Code of Conduct is accessible in the staff handbook – the key child protection sections are set out below.

Professional Boundaries

It is important that pupils can talk to staff in confidence, but staff should be alert to potential risks in situations where they are in consultation with individuals (e.g. private tuition, music lessons, career consultations, monitoring of progress, counselling etc).

The following should enable children to be safe from harm and adults protected from false allegations or misunderstandings:

- Treat pupils with respect and dignity.
- Do not touch children in an inappropriate or intrusive manner. If a child is distressed a hug might be appropriate, but only in a public place or with other people present. If demonstrating, e.g. in Music, PE or Drama, always ask a pupil's permission if it would be helpful to touch them.
- One-to-one meetings should, whenever possible, take place in public or semi-public places, e.g. tutor rooms, classrooms with windows on the ground floor or offices, BHM or ABHM studies. Avoid meeting in otherwise empty buildings, especially in the evenings or at weekends. If in doubt, leave the door open or let a colleague know that you are there.
- Do not invite pupils to your own home unless your child is a pupil and other pupils attend your home as their friends.
- Do not allow abusive peer activities, e.g. bullying or initiation ceremonies.
- Do not use physical punishment to control or discipline children.
- Try to avoid giving lifts in a car to an individual; if unavoidable tell a colleague.
- Use e-mail contact with pupils for professional purposes only; only use school e-mail. Do not allow pupils to join your Facebook pages.
- Do not take a pupil alone to a pub, restaurant, theatre or other meeting place outside school. In circumstances where such a meeting is appropriate or essential, let a colleague know what you are doing. Thus, for instance, a coffee in town during a free period with a sixth former to discuss an exchange is a very different proposition from taking the same sixth former out to dinner in the evening.

In Boarding / Residential situations:

- If visiting pupils in their rooms for any length of time doors should be propped open.
- Respect privacy in showers, toilets and changing rooms.
- Avoid being alone with an individual pupil
- Pupils must not enter any part of staff accommodation without the express permission of a member of staff, and, with the exception of babysitting, the pupil must not enter unless the member of boarding staff is there. Even with permission, care must be taken as to what is appropriate. For example, welcoming groups of boarders into a sitting room can help create a homely atmosphere, while individual meetings should normally take place in the BHM or matron's study. Entering the bedroom of a member of staff is never appropriate, and venturing beyond a kitchen, dining or sitting room would only be acceptable in the case of babysitting. Pupils must always use bathrooms in the boarding house, not in staff accommodation.
- Pupils babysitting may need to enter a child's bedroom, but only when the child is there. A pupil must not enter a staff member's bedroom.

If a child makes inappropriate verbal or physical approaches to you:

- Tell the child it is inappropriate.
- Tell the DSL, however embarrassing.
- Record the incident.

Sharing Concerns

If a staff or volunteer has a concern about the behavior of another staff member or volunteer towards or around children, including that they are not following the above rules of behavior, s/he should share this concern with the Designated Safeguarding Lead.

RECRUITMENT, SELECTION AND DISCLOSURES POLICY:

Sevenoaks School ("the School") is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority. The School aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

Appointment of New Staff/Governors/Volunteers

Part 3 of KCSIE 2018 and Part 4 of the ISI Integrated Handbook Regulatory Requirements should be consulted. The Single Central Record includes dates the following checks were made: identity; barred list; enhanced DBS; prohibition from teaching; further checks if living/working outside UK; professional qualifications; right to work in the UK and covers Staff, Governors and Volunteers who are unsupervised or regular and supervised. To comply with DfE letter 11.8.15: Checks for teacher prohibition orders issued by the TRA are made for all teaching post appointments since 1 April 2012. Checks for barring from management of an independent school by the Secretary of State under s.128 of the Education and Skills Act 2008 through DBS (regulated activity) or TRA (any) will be made for appointments from 11 August 2015 for Governors, the Head, any teachers on the senior leadership team or department heads, non-teaching staff if their post is part of the senior leadership team. It is not necessary for schools to check existing staff or members of proprietor bodies for the existence of an s.128 direction, even if they are in future promoted internally to a post for which a check is needed.

Application Form

The School will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms although they may be submitted as extra information. The School will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. It is therefore important that applicants provide the School with legally accurate answers.

Please see below for details on declaring any unspent convictions, cautions, reprimands or warnings as the successful applicant will be required to complete an Enhanced Disclosure from the Disclosure and Barring Service ("DBS") for the position. If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. If the candidate is not currently working with children but has done so in the past, the School will ask the relevant previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

Invitation to Interview

The School will short list applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. Short-listed applicants will then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail. The school reserves the right to research candidates' on-line presence before and after shortlisting and to use this information in making decisions around inviting to interview and/or making a job offer.

The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Head or Director of Personnel as to whether or not an interviewer should withdraw from the panel. The interview will be conducted in person and the areas which it will explore will include suitability to work with children.

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

The School requires that all candidates invited to interview bring with them originals (not photocopies) of the following documents:

- full birth certificate
- passport
- examination certificates and diplomas
- current driving licence (old style or counterpart driving licence if new credit card style licence)
- change of name documentation, if applicable
- details of any addresses other than the current, lived in within the last five years
- current (within 3 months) financial statement or utilities bill to confirm applicant's address
- Where appropriate any documentation evidencing a change of name;
- Where the candidate is not a citizen of a country within the European Economic Area or Switzerland, proof of entitlement to work and reside in the UK.

Candidates with a disability who are invited to interview should inform the School of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

It must never be assumed that information provided by candidates is correct. The checks noted in this policy are the minimum level of checks that should be carried out. Where any doubt or suspicion is held, exhaustive checks should be undertaken until the interviewer is entirely happy that all details have been verified as accurate.

The applicant must be told that the position for which they are applying is exempt from the provisions of the Rehabilitation of Offenders Act 1974 and that a disclosure at the enhanced level from the Disclosure and Barring Service will be applied for and that checks with the Protection of Vulnerable Children List will be carried out.

A member of the interview panel, normally the Senior Deputy for teaching staff, the Director of Personnel for support staff or the Sennocke Centre Manager for Sennocke Centre employees and coaches, must establish that the details on the application form and C.V. are correct. All have undergone safer recruitment training within the last five years.

If the awarding body for certificates or diplomas is unknown to the interviewer or if the interviewer has any doubts, adequate checks should be made to ensure the veracity of such documents. The interviewer will note any motoring offences listed on the driving licence and take photocopies of all documents, which they will sign and date, before returning the originals to the applicant.

Any gaps in the C.V. must be thoroughly investigated. The applicant must be able to give satisfactory explanations. Exact dates should be established. It must not be assumed that an employment said to have ended in, say, 1980 and a new employment said to have started in the same year were coincidental. Reasons for leaving previous posts should also be explained and given satisfactory explanations.

Conditional Offer of Appointment: Pre-Appointment Checks

Any offer to a successful candidate will be conditional upon:

- Receipt of at least two satisfactory references (if these have not already been received);
- Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK;
- A satisfactory enhanced DBS check and a check of the Barred List maintained by the DBS;

- For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State;
- Verification of professional qualifications, where appropriate;
- Verification of successful completion of statutory induction period (for teaching posts - applies to those who obtained QTS after 7 May 1999);
- Where the successful candidate has worked or been resident overseas such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered; and
- Satisfactory medical fitness.

It is the School's practice that a successful candidate must complete a pre-employment health declaration and for most roles, they will also be required to undergo a medical with their GP. The information from their GP will be reviewed against the Job Description and risk assessment for the role detailing any physical or mental requirements of the role i.e. proposed workload, extra-curricular activities etc. The School is aware of its duties under the Equality Act 2010 and if an individual did not pass their medical, no job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

Note: - The school will normally make the DBS checks no more than three working months before the start date. If the disclosure is delayed, the member of staff can begin work subject to the latest ISI Regulatory Guidance.

All staff are issued with access control ID cards which they should carry with them in order to gain access to school buildings. These are only issued once the DBS is complete and the original has been seen by the personnel team.

References

Written references must be obtained from the candidate's previous employer(s) or college and from at least one personal referee. The current or most recent employer(s) must be asked to provide dates of employment which should be checked against the information provided by the candidate. Referees are required to state whether applicants are suitable to work with children.

The previous employer should be contacted by telephone to establish if there is anything they may wish to say about the candidate that they would prefer not to put in writing. This is the minimum requirement. Additional telephone calls to other referees/previous employers should be made where any doubt exists.

The School will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate either at, or after the interview, depending upon the time in which the conflicting information is received.

Policy on the Recruitment of Ex-Offenders

The School will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed, as it makes its appointment decisions on the basis of merit and ability. As a result, if an individual has a criminal record this will not automatically bar him/her from employment within the School, but each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or the DBS.

Under the relevant legislation, it is unlawful for the School to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the School to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence.

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. The School will report the matter to the Police and/or the DBS if:

- the School receives an application from a disqualified person;

- is provided with false information in, or in support of an applicant's application; or
- the School has serious concerns about an applicant's suitability to work with children.

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence, serious class-A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink-driving.

Retention and Security of Records

The School will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

Volunteers

Any proposal to use adult unpaid volunteers needs to be referred to the Director of Personnel, who, with the Pastoral Deputy, will agree what level of checks are required.

Governors

Enhanced DBS, identity, overseas where appropriate and right to work in the UK checks are made. The Chair's enhanced DBS is countersigned by the Secretary of State.

Visitors to School

Normally visitors to school, including celebrities, would not have access to individual pupils and should be escorted by a member of staff at all times. Visiting examiners should have been checked elsewhere by exam-boards. Visitors to the school must be told in advance to report to Claridge House, where they will sign in and out. They will be issued with a temporary pass which they must wear, and car details recorded. They will be escorted by their host or a tour guide unless, for example, they are accompanying an exchange programme for a number of days. When the school is hosting events at the Performing Arts Centre, delegates will be asked to report direct there, where they will be issued with temporary IDs and car registration numbers recorded. Visiting speakers are either recommended or known to us, and follow normal procedures but in addition a member of staff would be in the room during the talk and stop the talk if it were to become inappropriate.

Contractors must be signed in and issued with contractor's ID cards via the Estates Department. Deliveries will report to CH, the catering department or Estates.

Pupils off-site

The school obtains assurance that appropriate children checks and procedures apply to any staff employed by another organization and working with the pupils on another site. Where this is impractical, e.g. on some trips abroad staff from other organizations do not have unsupervised access to pupils. The school works with partner

schools in exchanges to ensure that host families are appropriate. On study trips, language schools vet the host families.

ADULTS NOT EMPLOYED BY THE SCHOOL WHO ARE RESIDENT OR VISITING BOARDING ACCOMMODATION

Revised February/October 2013.

INTRODUCTION

This guidance note describes the school's expectations of the behaviour by all of the adult members of the families or households of members of the house staff who live in boarding accommodation. It is designed to comply with modern standards of child protection, and to make sure that everyone clearly understands what is expected of them. This policy also applies to the children of resident staff, if they are over 16.

BEFORE YOU MOVE IN

DBS Checks

Every adult member of a household occupying accommodation which is provided as part of an employee's conditions of employment is required to have a check with the Disclosure Barring Service. This clearance is required before the accommodation is occupied. The school will assist employees and their families in obtaining this clearance.

Occupancy Rights

The school does not bestow any rights of occupancy or tenure on the spouses/partners/adult children / other members of the households of its boarding house staff who have elected to move into the accommodation provided to a member of staff for the performance of his/her duties. The employee alone signs a licence to Occupy/Service Occupancy Agreement with the school before taking up residence, covering the conditions of occupancy in school property. One of those conditions is that all adult members of their household/family residing with them comply with this policy.

Induction in Child Protection

BHMs will arrange an induction session in child protection for any resident adults not employed by the school who are joining their house. The school keeps a record of everyone who has attended its induction sessions in child protection. For staff employed by the school, this is automatically recorded. For adults not employed by the school, a short form must be completed and returned to the Pastoral Deputy Head. (See the end of this policy).

Declaration

All adult members of boarding households must declare a written undertaking to comply fully with this policy which relates to the protection of pupils at the school. The school can insist that any individual who is not a member of staff removes him/herself from school accommodation where he or she has committed a breach of this policy which forms part of the school's child protection policy.

MOVEMENT BY MEMBERS OF THE HOUSEHOLDS OF HOUSE STAFF

Adult members of the households of house staff should be conscious of the fact that they are not school employees and that they have no status regarding the pupils for whom their spouse/partner/parent is responsible. Household members should not enter or attempt to use any of the areas that are designated for boarders, nor should they attempt to establish friendships with individual pupils. There are keypad locks to the boarding houses and CCTV monitors movement near the entrances and exits to the boarding houses. These barriers must be respected at all times. It is important that these guidelines are followed at all times by household members of boarding staff. Please remember that they are designed to protect the children who are the school's care. They are simple to follow and should quickly become a habit.

OCCASIONAL GUESTS AND REGULAR VISITORS

Boarding house staff and their families may entertain guests in their houses during term-time and invite guests to stay overnight; but it is important that their host ensures that they are aware of the fact that certain restrictions apply because they are visiting a school. Any visitors must not have substantial unsupervised access.

Guests should be advised that:

- They should not attempt to enter the areas that are designated for the boarders.
- They should be aware of their responsibilities when engaging pupils in conversation.
- They should go straight to their host's house on entering the campus and go straight to the campus exit on leaving.
- They should be escorted if they visit anywhere in the school apart from their host's accommodation.

SCHOOL HOLIDAYS

The restrictions on movement do not apply at times when the pupils are not on site.

CONCLUSION

The school goes to great trouble to ensure that it employs suitably qualified house staff. It invests considerable resources in their induction and training in child protection. It is also necessary to impose certain constraints on the families, households and private guests of our house staff- not because they are unwelcome. On the contrary, we understand and value the support which they provide to busy members of staff who work long hours.

Form to be completed by Resident Adults not employed by the school and returned to Pastoral Deputy Head:

NAME _____

ADDRESS _____

I have attended Child Protection training carried out by _____ on _____ (date)

Signed _____ Date _____