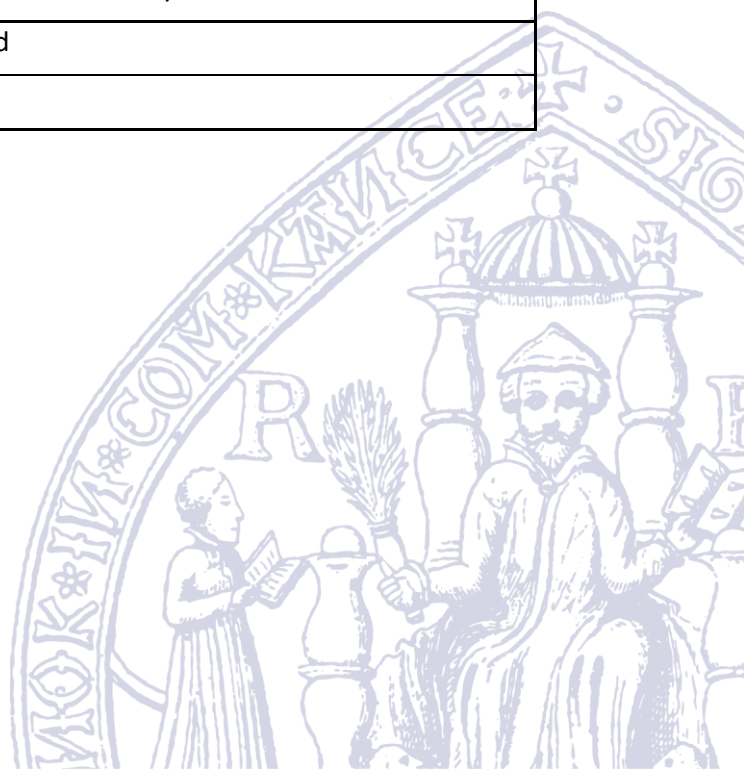


SEVENOAKS SCHOOL

Policy reference	AS1
Policy Category	A. Student and parent-facing policies
Name of policy	Safeguarding Policy
Purpose of policy	<p>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. This Policy includes the procedure to be followed:</p> <ul style="list-style-type: none"> • for the management of safeguarding • if a staff member suspects a child is being neglected/abused or at risk of being drawn into extremism, or a student makes a disclosure • to assist staff to protect themselves from criticism or accusations of malpractice which could potentially damage their careers. • if allegations are made of misconduct by staff or volunteer. • for appointing new staff or volunteers, and arranging for visits by non-staff.
Regulatory or legal requirement addressed by policy	<p>Education Regulations 2014 (Independent School Standards)</p> <p>Working Together to Safeguard Children (July 2018) (WTSC),</p> <p>Keeping Children Safe in Education (September 2023) (KCSIE),</p> <p>Boarding Schools' National Minimum Standards (2022),</p> <p>Prevent Duty Guidance (April 2021)</p> <p>FGM Guidelines</p>
Other policies referred to	<p>Anti-bullying Policy, Behaviour Policy, Staff Code of Conduct, IT Terms of Use, Student Mental Health and Wellbeing Policy, Online Safety and Anti-cyberbullying Policy, Physical Restraint Policy, Whistleblowing Policy, Intruder Policy, NMS and PSHE Policy</p>
Policy owned by	Designated Safeguarding Lead
Published on website	Yes



SAFEGUARDING POLICY

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, consensual or non-consensual sharing of nudes and semi-nude images or videos (formerly 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-centred. 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 sex, race and ethnicity, disability, sexual orientation, religion/beliefs, marriage/civil partnerships, 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 students tell us that they believe a child is being abused; a student 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 Designated Safeguarding Lead (DSL) is responsible for dealing with concerns about child welfare. Our policy is on the school's website, and has regard to:

- [Keeping Children Safe in Education \(KCSIE\) 2023](#)
- [Working together to safeguard Children \(WTSC\) updated July 2022](#)
- [What to do if you are Worried a Child is Being Abused - Advice for Practitioners](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(2019, updated September 2021\)](#)
- [Behaviour in Schools](#)
- [Children Missing Education \(September 2016\)](#)
- [Equality Act 2010](#)
- [Meeting digital and technology standards in schools and colleges \(2022, updated March 2023\)](#)

Other references:

- *Revised Prevent Duty Guidance: for England and Wales* (April 2021) (*Prevent*). *Prevent* is supplemented by non-statutory advice and a briefing note: *The Prevent duty: Departmental advice for schools and childminders* (June 2015)
- *The use of social media for on-line radicalisation* (July 2015)
- [UKCIS \(I+UK Council for Internet Safety\)](#)
- [Mental Health and Wellbeing Support in Schools and Colleges](#)

Introduction for Staff

Staff should at all times maintain a professional relationship with our students. The school enjoys a reputation for close and happy relationships between staff and students; but common sense, as well as legal and procedural guidance requires staff to maintain a proper professional detachment from all students 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 students of abuse or professional misconduct by teachers.

This policy gives the procedure to be followed:

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

It must be read in conjunction with the Anti-bullying Policy, Behaviour Policy, Staff Code of Conduct, IT Terms of Use, Student Mental Health and Wellbeing Policy, Online Safety and Anti-cyberbullying Policy, Physical Restraint Policy, Whistleblowing Policy, Intruder Policy, NMS, PSHE Policy and RSE Policy.

Vulnerable students

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.

Particular vigilance will be exercised in respect of any 'children with a social worker' (CWSW); that is, any who have been assessed as needing or previously needing a social worker within the past 6 years due to safeguarding and/or welfare reasons. Those students with specific mental or physical health needs which require greater support will also be closely monitored by the safeguarding team.

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We acknowledge that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

The school also recognises the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation, as well as the fact that children with SEND are potentially more at risk of suffering cases of sexual violence and sexual harassment. The school will therefore ensure that extra pastoral support and attention for these children, along with ensuring any appropriate support for communication, is put in place where necessary.

Equality Act 2010

The school will carefully consider how to support students with regard to particular protected characteristics – including disability, sex, sexual orientation, gender reassignment and race – and will take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students with a particular protected characteristic in order to meet their specific need. Some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. The school will remain vigilant as to these disproportionate vulnerabilities and provide safeguards and support accordingly.

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. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

□ **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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by 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. 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, 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 caregivers) 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.

□ **Serious violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as having been frequently absent, or permanently excluded from school, having experienced child maltreatment and having involved in offending, such as theft. Staff should also be aware that male students are statistically most likely to be at risk in this area, but that trans and non-binary students are also at risk. Indeed staff should not assume that girls are not at risk in this area and are encouraged to see behaviour as the primary indicator of risk.

□ **Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)**

These are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CSE is a form of sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

□ **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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.

Signs of abuse and neglect (NSPCC)

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

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. Our medical team are available (in the first instance) should a teacher need to refer/discuss a child who they deem to have one or more of the physical/behavioural indicators listed below.

There are 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 schoolwork
- 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 scapegoating 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 'blanking 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.

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>

Children who are absent from education and children missing education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The school's response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

The school has procedures in place to identify and respond to students who go missing, particularly on repeat occasions. A record is held by admin of student attendance and all absences are followed up by the Tutor. Unauthorised absences may be a safeguarding issue and, where not resolved via routine investigation by the school, must be reported to the DSL. The school usually holds home, mobile and work phone numbers of both parents and will always endeavour to keep at least two emergency numbers for each student on roll.

The school notifies the local authority:

- if any student fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 days or more.
- of all students who join or leave the school at non-standard transition times and when students leave the school before the age of 18 if the school does not know which school they are joining.

Early help

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.

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 Special Educational Needs
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour 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

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 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 necessary. Confidentiality is of the utmost importance and must be maintained on a need-to-know basis. 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>

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.

Child-on-child abuse

All staff should recognise that children are capable of abusing their peers (including online) and that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

Child-on-child abuse includes, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery).
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Whilst it is statistically more likely that girls will be victims and boys perpetrators, all child-on-child abuse is unacceptable and will be taken seriously. The school has a zero-tolerance approach to child-on-child abuse.

Students are informed of the range of avenues to reporting abuse but are encouraged in the first instance and where appropriate to report any concerns they have for themselves or others to their tutor. They are also made aware that they can report abuse to any member of staff in the knowledge that their concerns will be taken seriously. It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Measures to minimise risk

In addition to measures set out in the Anti-Bullying policy to promote a kind, considerate and tolerant environment for students, the school seeks to minimise the risk of child-on-child abuse through:

- education via assemblies and the PSHE programme
- appropriate supervision of students
- clear signposting to students at the start of the year and at regular intervals of the school's policy on sexual relationships between children
- due consideration of the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation, including the fact that boarders who are being bullied (offline) cannot escape their bullies for long periods of time as they are not going home as often
- providing a range of avenues for student voice and different ways for students to report concerns, including anonymously
- taking a proactive and visible approach to dealing with microaggressions and other 'low level' forms of abuse
- reminding staff of the need to be vigilant and report any concerns to the DSL

Response to allegations

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The School's response to incidents of child-on-child abuse will in the first instance be guided by its Anti-Bullying and Behaviour Policies and may, where appropriate, also involve a referral to other agencies such as the police or Social Services. 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'. In such cases, it will be assumed that all the students involved are at risk. Cases of sexual violence and sexual harassment will be dealt with according to the relevant guidance in KCSIE. Response to online safety concerns will be guided by advice from KSCMP via the Education People, as well as the relevant sections of KCSIE and, where appropriate, UKCIS guidance on 'Sharing nudes and semi-nudes'.

All concerns are recorded on CPOMS and the DSL leads the response, involving other pastoral staff where appropriate. The DSL maintains a record of cases of child-on-child abuse and reviews these on a regular basis with the DDSL team to consider lessons learnt.

If a student makes a direct allegation or disclosure:

- ☐ Reassure the student 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.

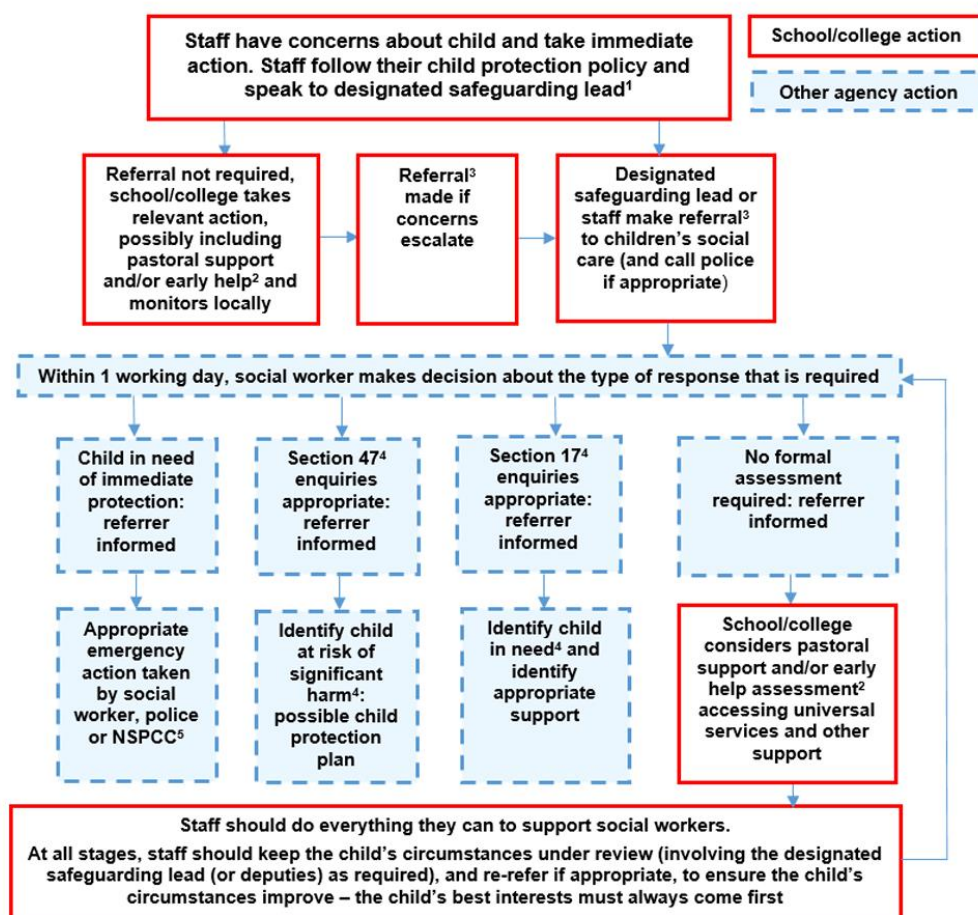
FGM

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.

Referrals

Staff must report to the DSL any concern or allegation about school practices or the behaviour of colleagues which are likely to put students at risk of abuse or other serious harm. Although responsibility for appropriate action (liaison with KSCMP, consultation with Social Services or formal referral as a matter of child protection concern) rests with the Headmaster and the DSL, anyone can make a referral, if necessary. 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 whistleblowing 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.

Actions where there are concerns about a child



Record keeping and preparing evidence

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.

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. The report should be submitted to the DSL asap and certainly within 24 hours. If recording bruising/injuries (staff must not ask for any removal of clothing), 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).

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. The DSL stores child protection concerns and referrals separately for each child. These records are stored separately from the student's main school file. Records should include:

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

Management of Safeguarding

The Governing body should ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of processes and policy. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, the governing body and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Governors must read and comply with KCSIE and ensure all staff who work directly with children read at least Part 1 and Annex B and staff who do not work directly with children Part 1 or Annex A depending on their role. 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 1 of the guidance. Governors must ensure that the Safeguarding Policy is effective, in accordance with government guidance and local safeguarding partnership (Kent Safeguarding Children Multi Agency Partnership (KSCMP)) 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/student relationships and communications including the use of social media. The school, as a Charity, also has regard to Charity Commission guidance on charity and trustee duties to safeguard children.

All governors receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated and includes awareness of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Governors should ensure that children are taught about Safeguarding, including online safety. These issues are covered in PSHE lessons and assemblies and reinforced in the wider curriculum. The Head of PSHE uses <https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health> to review the curriculum and works closely with the DSL. Governors must ensure that the ICT filters are appropriate and monitoring systems are in place but should be careful that 'overblocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding. DfE guidance *Teaching Online Safety in School* gives further details. ICT policies cover the 4 Cs in KCSIE:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The Education Committee reviews online safety, and the DSL reports at least annually to the Board of 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 Eccelstone (and from December 2023, Ms Adele Eastman).

The Designated Safeguarding Lead (DSL) is the Deputy Head Pastoral, Mr Jon Lidiard. There are also a number of Deputy DSLs (DDSLs) trained to the same level as the DSL; these are listed on the Contacts page below. 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 the Senior Deputy Head or the Deputy Head Boarding should be consulted and/or advice taken from local children's social care, with the DSL being informed as soon as possible.

The DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). Additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children. Whilst the activities of the DSL can be delegated to appropriately trained Deputies, the ultimate lead responsibility for child protection remains with the DSL. The broad areas of responsibility of the DSL can be found in Appendix 1.

Training

All new staff are provided with induction training that includes reference to:

- the school's Safeguarding Policy and systems, including safeguarding response to children who go missing from education and the policy and procedures to deal with child-on-child abuse
- the school's Online Safety Policy, including an understanding of the expectations and applicable roles and responsibilities in relation to filtering and monitoring
- key personnel, including the identity of the DSL and DDSLs, and their roles
- key policies including Behaviour, Anti-bullying, Staff Code of Conduct, Whistleblowing and IT Terms of Use
- the location of policies and the relevant sections of KCSIE and the requirement to read these as appropriate

All staff receive safeguarding and child protection (including online safety) updates in person on an annual basis and full training every three years, alongside termly updates for student-facing staff. The DSL and Deputy DSLs attend Level 3 refresher training every two years as a minimum and all resident boarding staff and Divisional Heads undertake Prevent training. All staff are required to read and understand the relevant section(s) of KCSIE, following updates, on an annual basis.

Code of Conduct

Gives clear guidance for all staff and volunteers (including Governors) on how to maintain professional boundaries and must be read by all.

Professional Boundaries

It is important that students 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 students 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 student's permission if it would be helpful to touch them.
- One-to-one meetings should, where possible, take place in public or semi-public places, e.g. tutor rooms, classrooms with windows on the ground floor or staff offices. Avoid meeting in otherwise empty buildings, especially in evenings or at weekends. If in doubt, leave the door open or let a colleague know you are there.
- Do not invite students to your own home unless your child is a student and other students 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 students for professional purposes only; only use school e-mail and do not request or share private contact details (including addresses and phone numbers). Do not follow or become a friend of students on social media, including after you or they have recently left the school unless with the express permission of the DSL.
- Do not take a student 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. Do not buy alcoholic drinks for students even if they are over 18 at school events (e.g. Leavers' Ball) or on trips.

Allegations made against/Concerns raised in relation to staff (including volunteers and contractors)

The school promotes an open and transparent culture in which all concerns about adults, including low level concerns, are shared responsibly and with the right person, recorded and dealt with appropriately. Allegations or concerns about a staff member (including the DSL) that may meet the harm threshold (see below) should be reported to the Headmaster (or to the Chair of Governors either in his absence or where there is a potential conflict of interest in reporting to the Headmaster). An allegation about the Headmaster should be directed to the Chair of Governors, Ms Alison Beckett, or the designated Safeguarding Governor, Mrs Eliza Ecclestone, without informing the Headmaster. In each of these scenarios, the recipient of the report becomes the 'case manager'. Low level concerns (concerns about a staff member that do not meet the harm threshold – see below) should be reported to the DSL, Deputy Head Staff or Headmaster.

Allegations that may meet the harm threshold

Allegations that may meet the harm threshold are those where it is alleged that a staff member has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In such cases the case manager will speak to the LADO, who provides advice and presides over any ensuing investigation, prior to investigating allegations. For supply staff, the agency must be kept fully informed and involved. A referral must be made within twenty-four hours. In cases of serious harm, the police should be informed from the outset. Discussions should be recorded in writing, communications with the student(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 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 HR records. Disciplinary action against student(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. If the school dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, the school must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). 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>

Low level concerns

Allegations or concerns that do not meet the harm threshold may be deemed low level concerns. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate contact outside of work, and
- does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO. (If on receipt of a low-level concern there is any doubt as to whether the information in fact meets the harm threshold, the LADO will be consulted.)

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone.
- engaging with children on a one-to-one basis in a secluded area or behind a closed door.
- using inappropriate sexualised, intimidating, or offensive language

As with all concerns, it is important that low level concerns are shared responsibly and with the right person, recorded and dealt with appropriately. Whilst the Headmaster will be the ultimate decision maker in respect of all low-level concerns about a member of staff, they can be reported confidentially to the DSL, Deputy Head Staff or Headmaster, who have shared oversight. Staff should feel confident to self-refer. Low-level concerns about someone employed by a supply agency or contractor should be shared in the same way. The concern will be recorded, and their employer notified so that potential patterns of inappropriate behaviour can be identified. Where a third party has raised the concern, as much evidence as possible will be collected by speaking:

- directly to the person who raised the concern (if known).
- to the individual involved and any witnesses.

All low-level concerns will be recorded in writing and will include:

- details of the concern.
- the context in which it arose.
- evidence collected by the DSL where the concern has been raised via a third party.
- the decision categorising the type of behaviour.
- action taken.
- the rationale for decisions and action taken.
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible).

The Headmaster, DSL and Deputy Head Staff review records so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies will be revised, or extra training delivered to minimise the risk of it happening again.

Contact details

- DSL: Deputy Head Pastoral, Jon Lidiard jd@sevenoaksschool.org
- Deputy DSLs:
 - ⊗ Deputy Head Staff, Helen Tebay hpt@sevenoaksschool.org
 - ⊗ Sixth Form Divisional Head, Vanessa FitzGerald vjf@sevenoaksschool.org
 - ⊗ Head of Middle School, Rachel McQuillin rlm@sevenoaksschool.org
 - ⊗ Middle School Divisional Head, Cameron Kiggell lck@sevenoaksschool.org
 - ⊗ Head of Lower School, Manuel Atkinson mca@sevenoaksschool.org
- Headmaster: Jesse Elzinga hm@sevenoaksschool.org
- Governor with responsibility for Child Protection
 - ⊗ Current: Mrs Eliza Ecclestone e.ecclestone@sevenoaksschool.org
 - ⊗ From December 2023: Ms Adele Eastman a.eastman@sevenoaksschool.org
- Chair of Governors, Ms Alison Beckett a.beckett@sevenoaksschool.org
- Local Safeguarding Children Board
For urgent child protection issues, please call the Integrated Front Door: 03000 411111 (out of hours number: 03000 419191)
For early help, see Early Help and Preventative Services:
<https://www.kent.gov.uk/education-and-children/early-help-support-for-families#tab-2>
- Central Referral Unit:
Kroner House, Ashford
Tel: 0300 3335647
- Area Safeguarding Advisor for North Kent:
Worrall House (Dartford, Gravesham, Sevenoaks)
30 Kings Hill Avenue, West Malling ME19 4AE
Office: 03000 412445
- LADO Team contact number: 03000 410888
- 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 *what you can do to report abuse* dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. 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.

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 2022 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; educational and professional qualifications; references, medical fitness, background history 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 Headmaster, any teachers on the senior leadership team or department heads, non-teaching staff if their post is part of the senior leadership team. The School will check existing staff or members of proprietor bodies for the existence of an s.128 direction, if they are promoted internally to a post for which a check is needed. From September 2022 an online search of publicly available information will be completed on shortlisted applicants and recorded on the SCR for the appointed person.

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 shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. Shortlisted 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' online presence before and after shortlisting and to use this information in making decisions around inviting to interview and/or making a job offer. The school will inform shortlisted candidates that online searches may be done as part of due diligence checks.

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 Headmaster or Head of HR 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 claimed by the applicant and that are taken into account in making the appointment (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
- ☐ 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 Deputy Head Staff for teaching staff, or a member of HR for support staff, 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.

A member of the HR team will request any names that the applicant uses or has used and will conduct an online search of publicly available information on the applicant. Any information found considered relevant to their suitability for working with children will be shared with the interview panel who may explore the information further with the applicant at interview.

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 the candidate is not subject to a prohibition order issued by the Secretary of State.
- ☐ For candidates employed to management positions, a check that the candidate is not subject to a section 128 direction prohibiting them from management.
- ☐ 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.

- Satisfactory medical fitness.

It is the School's practice that a successful candidate must complete a pre-employment health assessment or declaration. . 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 HR 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.
- 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 Head of HR, who, with the Deputy Head Pastoral, will agree what level of checks are required.

Governors

Enhanced DBS, identity, prohibition from management (section 128 check), 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 students 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 Manor 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 an internet search of the background and risk assessment would be undertaken to ensure they are suitable. Normal procedures are followed 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.

Students off-site

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

Introduction

This guidance describes the school's expectations of the behaviour by all adults who are not current students and who are accommodated on any part of the site in boarding house accommodation. It is designed to comply with modern standards of safeguarding, and to make sure that everyone clearly understands what is expected of them.

The restrictions on movements do not apply at times when the students are not on site. There may be some restrictions if the boarding house is let which will be conveyed to you at the time.

Declaration

All adult members of boarding households who are not current students at the school must declare a written undertaking to comply fully with this guidance, which relates to the safeguarding of pupils at the school. This guidance therefore forms part of the school safeguarding policy.

The school can insist that any individual who breaches this guidance and is not a member of staff removes themselves from school accommodation. There are additional procedures in place for individuals who are members of school staff.

Guidance for members of boarding staff

Students must not enter any part of staff accommodation without the express permission of a member of staff, and, with the exception of babysitting, the student 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 for babysitting, as detailed below. Students must always use bathrooms in the boarding house, not in staff accommodation.

Babysitting

Boarders may not enter staff accommodation (boarding staff accommodation, school accommodation or private homes); it follows that they cannot babysit for staff children. Day students may babysit, but only where parents are either colleagues or friends of the staff member, and when arrangements are made directly with the student's parents. Great care must be taken that safeguarding standards are maintained. Any day students babysitting may need to enter a child's bedroom, but only when the child is there. A student must never enter a staff member's bedroom. There is further guidance on this in the staff handbook.

Friends of household children

NMS 20.10 does not prevent boarders visiting their friends who live in staff residential accommodation. Day pupils or boarders from other houses who are good friends with a household child may enter a child's bedroom, but only when the child is there.

During term time boarders of the same boarding house should not venture beyond the kitchen, dining or sitting room of the boarding accommodation, and may only visit only when the child is there. Outside term time if a boarder from the same boarding house wishes to visit a household child, then boarding staff should give careful consideration as to whether this may cause a conflict of interest. In particular, care must be taken to avoid any possible allegations of favouritism or inappropriate relationships. Any overnight stays outside term by boarders from the same house should be declared to the Deputy Head Boarding.

Guidance for all members of the household

Definition of Household

This includes anyone who regularly stays for one night a week or more. It would include children who are away at university and return during the holidays, or grandparents involved in regular overnight childcare.

DBS Checks

Any member of the household who is over the age of 16 and is not a current student at the school is required to have a DBS Check. This 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 the staff of Sevenoaks School for the performance of their duties. The employee alone signs an 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 guidance.

Induction in Safeguarding

Members of school staff receive regular safeguarding training. Members of the household who are over 16 but not members of school staff, nor students on the school roll, should read this guidance and return the required form to say that they have understood.

Contact with school students by members of the household not employed by school
Adult members of the household who are not school employees must be conscious of the fact that they have no status regarding the students 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, except for public areas of the house when invited to specific events or to access their accommodation, nor should they attempt to establish friendships with individual students. Any security measures must be respected.

The school employs Marshals who are instructed to check movements and to challenge individuals who appear to be moving in restricted areas. Please do not take offence if you are challenged.

Occasional guests – accommodation adjacent to the boarding house

This section applies to adult visitors who are neither members of the household as defined above, nor students at the school. It is the responsibility of the host to ensure the guidance is adhered to.

During the day

The principle is that occasional guests and regular visitors must not have unsupervised access to students. In practice this means that they:

- must not attempt to enter the areas that are designated for the boarders except to attend specific events, or if necessary to access their host's accommodation.
- should avoid engaging students in conversation
- should go straight to their host's house on entering the school and go straight to the nearest school exit on leaving
- should be asked to wear a visitor's badge and be escorted if they visit anywhere in the school apart from their host's accommodation; and
- should not be left alone in their host's accommodation

Staying overnight

Boarding house staff and their families may entertain guests in their houses during term-time and invite guests to stay overnight; but the host must ensure they are aware that certain restrictions apply because they are visiting a school. Permission should be sought in advance from the BHM.

Conclusion

The requirement to prioritise safeguarding in every aspect of school life means that it is necessary to impose certain constraints on the families, households and private guests of our house staff. This is not because they are unwelcome: on the contrary, we understand and value the support they provide to busy members of staff who work long hours.

Appendix 1 – The role of the DSL (as outlined in Annex C of KCSIE)

The DSL is expected to refer cases (and support staff who make referrals):

- of suspected abuse and neglect to the local authority children's social care
- to the Channel programme where there is a radicalisation concern
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service
- where a crime may have been committed to the Police.

The DSL is expected to:

- act as a source of support, advice and expertise for all staff.
- act as a point of contact with the safeguarding partners.
- liaise with the Headmaster to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaise with the "case manager" (as per Part four) and the LADO for child protection concerns in cases which concern a staff member.
- liaise with staff as appropriate on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- oversee and liaise with those responsible for the school's mental health provision.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- work with the Headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.

The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. The DSL should ensure that information is shared only where appropriate, both within school and between schools where children leave the school or college (including in year transfers). The DSL should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college.

The DSL should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff.
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governors regarding this.
- ensure the child protection policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made, and the role of the school in this.
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

The DSL (and Deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL should undertake Prevent awareness training. Training should provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- 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.
- understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children.
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational

outcomes.

- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners.
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND 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.

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

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes.
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

It is important that children feel heard and understood. Therefore, DSLs should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them.
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

The DSL should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

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