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## Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

## Abbreviations

Organisations, publications and papers with multiple references throughout this document will appear as follows:

-	Keeping Children Safe in Education	KCSiE
-	Working Together to Safeguard Children	WTTSC
-	UK Council for Child Internet Safety	UKCCIS
-	Local Authority Designated Officer	LADO
-	Suffolk Safeguarding Partnership	SSP (Formerly SSCB)
-	Multi-Agency Safeguarding Hub	MASH

## Annexes to this policy:

- Annex 1 Types of abuse and neglect (as identified in KCSiE)
- Annex 2 Further information on Female Genital Mutilation (FGM)
- Annex 3 Further Information on Preventing Radicalisation – 'Prevent'
- Annex 4 E-Safety
- Annex 5 Staff Code of Conduct
- Annex 6 Role of Designated Safeguarding Leads
- Annex 7 Whistleblowing Policy

## Introduction

The proprietor recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance, Keeping Children Safe in Education (2021) (KCSiE), Working Together to Safeguard Children 2018 (WTTSC) and locally agreed inter-agency procedures put in place by the Local Safeguarding Partnership

This policy will be reviewed annually, as a minimum, and will be made available publicly via the school website or on request.

Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

This policy is for all staff, parents, governors, volunteers and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with the school's Code of Conduct/Staff Behaviour Policy (including Acceptable Use of ICT), Safer Recruitment Policy, E-Safety Policy and Anti-Bullying Policy.

The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of children and young people and ensure that they understand and meet their statutory responsibilities;
- Ensure consistent good practice across the school.

The proprietor expects that all staff will know and understand this child protection and safeguarding policy and their responsibility to implement it. Staff must, as a minimum, have read and understand Part One of KCSiE and Appendix A.

The proprietor will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated.

Compliance with the policy will be monitored by the Principal, Designated Safeguarding Lead (DSL) and the named safeguarding proprietor.

## Statement of Intent

Brookes UK wants to safeguard and promote the welfare of children who are pupils at the school, including boarders, Boarding Schools National Minimum Standards 2015 and EYFS which complies with the Department for Education (DfE) KCSiE – statutory guidance for schools and colleges – and has regard to WTTSC.

Safeguarding Children is the action we take to promote the welfare of children and protect them from harm.

Children includes everyone under the age of 18

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes

This policy includes guidance on procedures when a member of staff, volunteer, Senior Designated Safeguarding Lead for safeguarding and child protection (DSL) or Principal faces allegations of abuse.

This policy covers both our Early Years provision and the whole School, including boarding.

Parents and Carers can access this policy on the [school's website](#) and reference is made to safeguarding duties in the Parent Handbook and in the Statement on Child Protection displayed in the foyer and other key locations.

The school recognises that effective child protection work requires sound procedures, good inter-agency co-operation (Section 10 of the Children's Act) and a workforce that is competent and confident in responding to child protection situations.

The welfare of pupils at Brookes UK is safeguarded and promoted by the drawing up and effective implementation of our written risk assessment policy at whole school, site, section and department level, and with appropriate action taken to reduce risks that are identified.

## Children who may be particularly vulnerable

We recognise specifically that children living away from home in a boarding setting can face additional safeguarding challenges. We also recognise the particular vulnerabilities of children with special educational needs and disabilities (SEND) to abuse. Children with SEND can face additional safeguarding challenges and we recognise that additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

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

### Contact Information

#### To report a concern of a child at risk of harm, abuse or neglect phone:

Customer First free phone Number: 0808 800 4005

Lines are open 8.00 am to 6.45 pm Monday to Friday

Outside these hours your call will be diverted to the Emergency Duty Service

Suffolk Police: Main switchboard Number: 01473 613500 or 999

The NSPCC child protection helpline on 0808 800 5000

**For allegations against all staff and volunteers Safeguarding Managers can be contacted via email on [LADOCentral@suffolk.gcsx.gov.uk](mailto:LADOCentral@suffolk.gcsx.gov.uk) or using the LADO central telephone number 0300 123 2044**

We advise use of the 101 (non-emergency police number), not just for cases of serious harm but where there are concerns about extremism, for example. The DfE dedicated helpline and mailbox for non-emergency advice for staff and proprietors: 020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk).

## Roles and Responsibilities

**Safeguarding and promoting the welfare of children is everyone's responsibility.**

### Proprietor

The proprietor has a legal responsibility to make sure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children and young people's welfare, and to monitor that the school complies with them. The proprietor should also ensure that the policy is made available to parents and carers by publishing this on the school website or in writing if requested.

The proprietor will ensure that the school contributes to multi-agency working in line with statutory guidance WTTSC and that the school's safeguarding arrangements take into account the procedures and practice of the local authority.

### Designated Safeguarding Lead (DSL)

The DSL should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role-holder's job description. (The broad areas of responsibility and activities related to the role of the DSL are set out in Annex B of KCSiE and Annex 6 (Role of Designated Safeguarding Leads) of this policy.

The DSL will have the appropriate status and authority to carry out the duties of the post.

The DSL and any alternate DSLs should liaise with the local authority and work with other agencies in line with WTTSC.

During term time, the DSL and/or an alternate should always be available during school hours for staff to discuss any safeguarding concerns. The DSL will make arrangements for adequate and appropriate cover arrangements for any out of hours/out of term time activities.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role. This training will be updated every two years.

The DSL is safeguarding lead for EYFS.

### Principal

The Principal will ensure that the policies and procedures adopted by the Board are fully implemented and that sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.

### All staff

- All staff have a responsibility to provide a safe environment in which children can learn.
- All staff must read and ensure they understand Part One of KCSiE and all other statutory safeguarding documentation as outlined in staff training sessions. A record of this as well as attendance at training is kept.
- All staff must ensure they are familiar with the systems within school which support safeguarding, including the safeguarding and child protection policy, the code of conduct/staff behaviour policy, the safeguarding response to children who go missing from education, and the role of the DSL (including the identity of the DSL and any deputies).
- All staff should be aware of the types of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.
- All staff should know what to do if a child tells them he/she is being abused or neglected.
- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, especially section 17 (children

in need) and section 47 (a child suffering, or likely to suffer, significant harm) along with the role they might be expected to play in such assessments.

- All staff should be aware of the early help process and understand their role within it. This includes providing support as soon as a problem emerges, liaising with the DSL, and sharing information with other professionals in order to support early identification and assessment, focussing on providing interventions to avoid escalation of worries and needs. In some cases, staff may be asked to act as the lead professional in undertaking an early help assessment.

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

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child

Knowing what to look out for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the DSL (or deputy). If in exceptional circumstances the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

### **Abuse of position of trust**

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence. **See Annex 5 - Staff Code of Conduct**

## **Training**

The proprietor will ensure that all staff receive appropriate safeguarding and child protection training which is regularly updated and in line with [advice from SSP](#). In addition, all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This will include Prevent, online safety and informal updates.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, the code of conduct/staff behaviour policy, whistleblowing procedures/policy and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSiE and Appendix A will be provided to new staff at induction.

NB If there are circumstances which meant that a copy of KCSiE could not be read (for example by way of language or lack of literacy) we would ensure that they would understand the key information.

The Principal will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

## Recognising concerns - signs and indicators of abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Abuse can take place wholly online or technology may be used to facilitate offline abuse.

KCSiE refers to four categories of abuse. These are set out in Appendix One along with indicators of abuse.

If staff have significant concerns about any child they should make them known to the school's Senior Designated Safeguarding Lead (DSL), **Mrs Natalie Taylor, Principal** or **Mr Frederick Walton** (Deputy DSL) **Mrs Susanne Walton** (Deputy DSL) and **Jenny Donlon, (Early Years SENDCo)** (Deputy DSL)

By phone: (via the main school switchboard)

01284 760531

By email:

[Natalie Taylor \(Lead DSL\)](#)  
[Freddie Walton \(Deputy DSL\)](#)  
[Susie Walton \(Deputy DSL\)](#)  
[Jennie Donlon \(Deputy DSL\)](#)

By letter to:

Brookes UK, Flempton Road, Risby, Bury St Edmunds IP28 6QJ

**Mr David Rose** (Proprietor) is responsible for the employment of staff.

The Proprietor will have an oversight of this policy and will be kept informed of any concerns or changes to staff and procedures.

Contact email:

[David Rose \(Proprietor\)](#)

Contact Telephone:

07943 256605

### Taking Action

Consider what you know, what you have seen and things about the child which cause concern.

#### If a child chooses to disclose, you **SHOULD**:

- be accessible and receptive;
- listen carefully and uncritically at the child's pace;
- take what is said seriously;
- reassure the child that they are right to tell;
- tell the child that you must pass this information on;
- make a careful record of what was said.
- Discuss your concerns urgently with the DSL or Deputy DSL.
- Complete the Pupil Record of Concern Form. We have a unique form for Safeguarding concerns which is kept in the staff room on the Safeguarding Board and in the duty boarding office. Attach any written notes or records of discussions to the form. If no form is available staff should write down as much as they can as soon as possible after the concern has surfaced – this can be transferred to the



appropriate form once available. The Safeguarding Concern form is signed and dated and kept in a separate confidential file under the direction of the Principal.

- Staff are advised not to use email to write down or report abuse or concerns. If for any reason an email is considered appropriate to communicate to another party, the child's full name or other features that would identify him/her should not be included.
- The Principal reviews the forms regularly, takes action as appropriate and all records are kept confidential, and reviewed regularly so that concerning patterns of behaviour can be spotted.
- **It is essential that all concerns, discussions and decisions and the reason for those decisions are recorded in writing.**

#### **You should NEVER:**

- take photographs or examine an injury;
- investigate or probe aiming to prove or disprove possible abuse – never ask leading questions;
- make promises to children about confidentiality or keeping 'secrets';
- assume that someone else will take the necessary action;
- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or child) allegedly involved;
- offer opinions about what is being said or about the persons allegedly involved;
- forget to record what you have been told;
- fail to pass the information onto the correct person;
- ask a child to sign a written copy of the disclosure.
- For children with communication difficulties or who use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

#### **Taking concerns forward**

When a record of a safeguarding concern is passed to the DSL, they will record the time and date the record of concern was received. The DSL will assess the concern and taking into account any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached. If the DSL is unsure whether the threshold has been met they will contact the MASH Professional Consultation Line for advice (0345 606 1499). Where appropriate, the DSL will complete and submit a [Multi Agency Referral Form \(MARF\)](#).

Where the DSL believes that a child or young person may be at imminent and significant harm or risk of harm they should call Customer First (0808 800 4005) immediately and then complete the SSCB MARF within 24 hours to confirm the referral. In these circumstances, it is important that any consultation should not delay a referral to Customer First.

Where a safeguarding concern does not meet the threshold for completion of a MARF, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help.

School staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conference in advance of the meeting in accordance with SSCB procedures and timescales.

Where reasonably possible, the school is committed to obtaining more than one emergency contact number for each pupil.

School staff must ensure that they are aware of the procedure to follow when a child goes missing from education.

## Children Missing in Education

All new arrivals to the school, of compulsory school age, must be recorded on the required Suffolk County Council form and e-mailed to the Suffolk Children Missing In Education (CME) team. Where reasonably possible the school should hold more than one emergency contact number for each pupil/student. This form must be completed **within 5 days** of the pupil/s arriving at the school, (not new intakes such as Reception or Y7)

- The parent of any pupil who leaves the school must be asked for the name and address of the school they are moving to. Parents must also provide a forwarding home address and telephone number. This information must be sent to Suffolk CME team **within 5 days** of the child leaving the school.

If a child does not return to school after a break, and you have not been given a reason for this, you must inform Suffolk County Council. You are required to make investigations on behalf of the CME team to find out any information from friends of the family. E.g. ask basic questions of parents you know were friends with the family of the missing child. A friend might be able to say, for example, they've moved to Spain, but don't know the address. This information would mean the CME officer would be able to make contact with contacts in Spain to see if they can find any indication if the child has appeared in the education system there.

### Informing Parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and well being of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

### Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, Principal or proprietor. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

KCSiE emphasises that any member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with our Retention and Destruction Policy.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Record of Concern forms will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL.

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The school's Confidentiality and Information-Sharing Policy is available to parents and pupils on request.

## **Boarding School and children staying with host families**

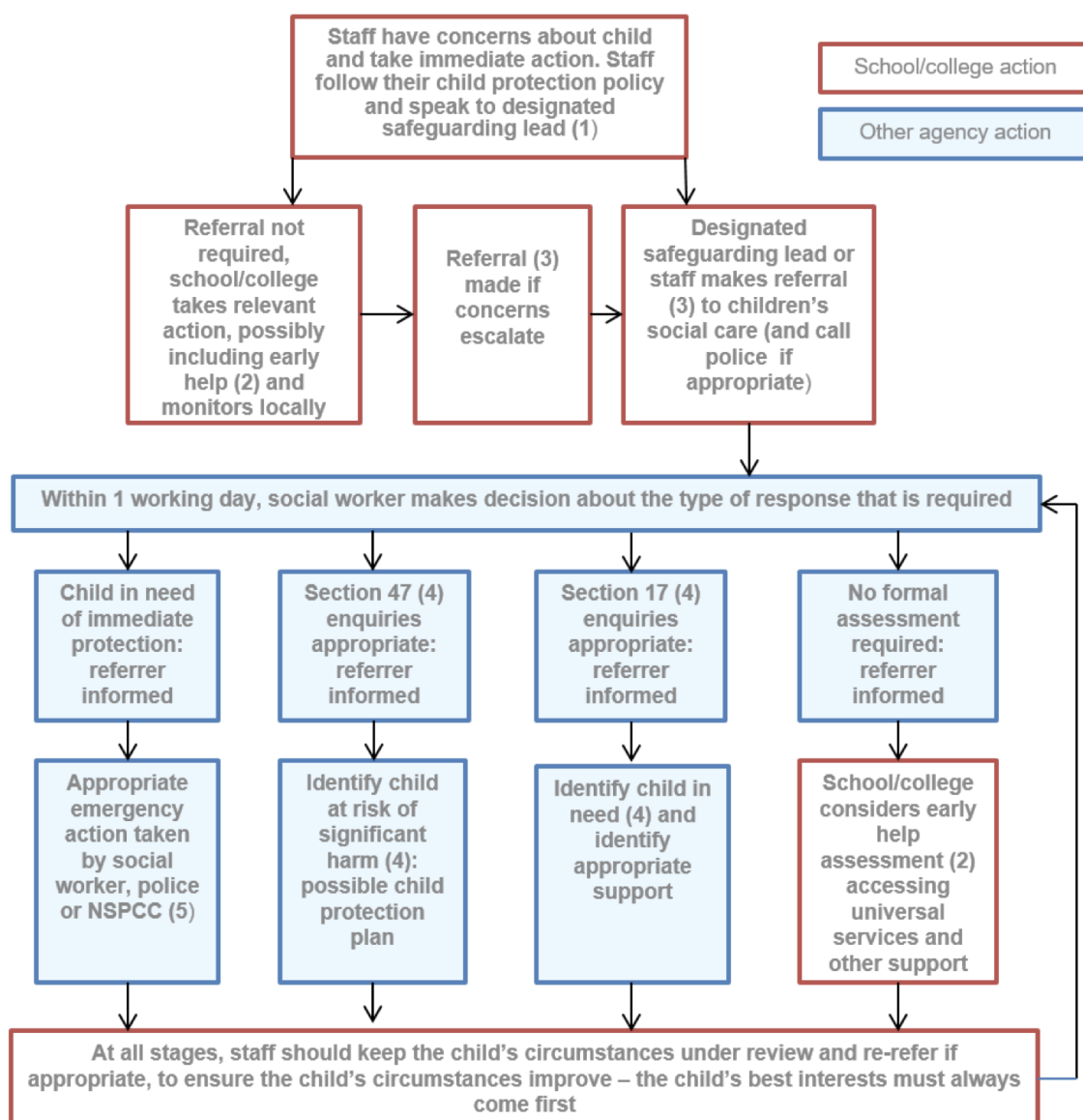
Research has shown that children can be particularly vulnerable in residential settings. Our boarding accommodation in Gryphon House complies with the National Minimum Standards and is appropriately inspected.

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some boarding pupils may reside with host families during school terms.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad we will agree with our sister schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The school follows the guidance in Annex E of KCSiE (KCSiE 2021) to ensure that hosting arrangements are as safe as possible.

## Actions where there are concerns about a child



- (1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.
- (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged. Chapter one of WTTSC provides detailed guidance on the early help process.
- (3) Referrals should follow the local authority's referral process. Chapter one of WTTSC
- (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter one of WTTSC
- (5) This could include applying for an Emergency Protection Order (EPO).

## Peer on peer abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, all staff recognise that children are capable of abusing their peers and should be clear about the school's policy and procedures regarding peer on peer abuse. All peer on peer abuse is unacceptable and will be taken seriously.

Peer on peer abuse can take many forms, including:

- **physical abuse** such as biting, hitting, kicking or hair pulling
- **sexually harmful behaviour/sexual abuse** such as inappropriate sexual language, touching, sexual assault
- **sexting**, including pressuring another person to send a sexual imagery or video content
- **teenage relationship abuse** - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.
- **Upskirting** - typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with peer on peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

At Brookes UK we take the following steps to minimise or prevent the risk of peer on peer abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- RE and PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school.
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.

All allegations of peer on peer abuse should be passed to the DSL immediately. They will then be investigated and dealt with as follows.

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police.

- **Inform parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Where allegations of sexual violence or sexual harassment are made, the school will act in accordance with the guidance set out in Part 5 of KCSiE.

### **Supporting those involved**

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil who harmed. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

## **Online safety**

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to pupils, who can contact our pupils and the personal conduct of our pupils online.

### **Sexting**

There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The [UKCCIS](#) refers to this as 'youth produced sexual imagery'.

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a child has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate. This may include seizure of devices and interviews with the young people involved

We include in our safeguarding concerns children who run away or go missing, Female Genital Mutilation, Child Sexual Exploitation, Radicalisation, Peer on Peer abuse and sexual violence and sexual harassment between children. Whilst, because of our locality and setting, some of these may be rare occurrences, we recognise their importance and presence, especially since we have now become a boarding school and have students from different cultures.

## Honour-Based Violence

FGM is a form of honour-based violence and is illegal in the UK. In addition to reporting cases of FGM to the police, teachers should also discuss the case with the DSL and should involve children's social care as appropriate. **See Annex 2.**

## Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact 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).

The definition of child sexual exploitation is as follows:

*Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.*

**Any practitioner working with a child who they think may be at risk of child sexual exploitation should follow the guidance set out in WTTSC and share this information with local authority children's social care. You should refer any concerns about a child's welfare to local authority children's social care. If you believe a child is in immediate risk of harm, you should contact the police.** (Child Sexual Exploitation DfE February 2017)

## Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity where drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#). The National crime agency information on human-trafficking should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## Preventing Radicalisation - Prevent

Protecting children from the risk of radicalisation is similar in nature to protecting children from other forms of harm and abuse. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the

Channel programme. All staff have Prevent training through Educare so they are aware of potential risks. **See Annex 3 - Further Information on Preventing Radicalisation – ‘Prevent’.**

## **Safer recruitment**

Our school complies with the requirements of KCSiE and the LSCB by carrying out the required checks and verifying the applicant’s identity, qualifications and work history. This is detailed in the school’s Safer Recruitment policy.

At least one member of each recruitment panel will have attended safer recruitment training.

All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare legislation and their obligations to disclose relevant information to the school.

The school obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the school have been appropriately checked.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

The school maintains a single central record of recruitment checks undertaken.

### **Volunteers**

Volunteers, including governors will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

### **Contractors**

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

### **Site security**

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school’s safeguarding and health and safety regulations. The Principal will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

### **Extended school and off-site arrangements**

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.



## Training of staff in safeguarding matters and KCSiE

- The training of all the DSL's is conducted by Educare and/or Suffolk County Council and includes child protection, higher-level safeguarding and inter-agency working, and is updated at least once every two years.
- New staff, volunteers and other workers (such as self-employed, visiting instructors) who join the School are required to participate in induction training appropriate to their role. This will include as a minimum:
  - Identification of the School's Lead DSLs
  - The school's safeguarding policy
  - The code of conduct for staff
  - Whistleblowing procedures/policy
  - Specific reference to online safety and training
  - A copy of Part 1 of KCSiE and Appendix A

Such induction training will usually take place in the first few weeks of employment.

- All existing staff, volunteers, residents and other workers (such as self-employed, visiting instructors) who work with children receive updated training at regular intervals with the content being in accordance with the LSCB. We aim to ensure this happens at least once every three years with training being delivered by an external consultant.
- Those staff, volunteers and other workers (such as contractors) who do not work directly with children receive training as deemed appropriate to their role by the SDP. Such workers are always advised not to have contact with children and not to encourage inappropriate friendships. This training and supporting guidance will also be updated at regular intervals. We aim to ensure this happens at least once every three years and is usually delivered by the SDP.
- All staff, volunteers or other workers who have contact with children are required to have read Part 1 of KCSiE and Appendix A.

*NB If there are circumstances which meant that a copy of KCSiE could not be read (for example by way of language or lack of literacy) we would ensure that they would understand the key information.*

- A record of training in safeguarding/child protection is kept on a central record by the Office Manager.

## Staff Obligations

- All staff in our school are required to notify the Principal immediately if there are any reasons why they should not be working with children.
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) replaces version of Disqualification under the Childcare Act 2006, which was last issued by the Department for Education in June 2016 and applies to those providing early years childcare or later years childcare including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.
- The school takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the Principal immediately.
- The lead member of staff for ICT liaises frequently and meets at least once a term with the DSL to review actions with regards to technology and online safety, and recommendations from such meetings notified to staff.
- Staff who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or

involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Principal for more details.

### Staff, volunteers or workers leaving

- The school will promptly report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met; that is, they have caused harm or posed a risk of harm to a child.
- In addition, consideration will also be given to making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed for misconduct (or would have been dismissed had s/he not resigned) and a prohibition order may be appropriate. The reasons for such an order include “unacceptable professional conduct”, “conduct that might bring the profession into disrepute, or a “conviction”, at any time, for a relevant offence.

### Allegations of abuse against members of staff, volunteers or the Principal

By this we mean allegations of serious harm or abuse by any person living, working or looking after children in our school (whether that allegation relates to harm or abuse committed on our premises or elsewhere) or of any other abuse which is alleged to have taken place on the premises or elsewhere. Allegations must be reported immediately.

Whom should allegations be reported to?	
Allegations against Staff, volunteer or the Lead DSL (if not Head) should be reported to:	Allegations against the Principal should be reported to:  (Principal should not be informed if allegation is against them)
<b>Natalie Taylor, Principal</b>  01284 760531  <a href="mailto:ntaylor@uk.brookes.org">ntaylor@uk.brookes.org</a>	<b>David Rose, Proprietor</b>  07943 256605  <a href="mailto:drose@brookes.org">drose@brookes.org</a>

The school will adhere to the statutory guidance on dealing with allegations of abuse in force at the time, with any further action – including investigation – taken only with the agreement of the LADO or Duty Social Worker. The following key principles apply:

- We will consider and thoroughly investigate any allegation expeditiously, fairly and consistently, avoiding all necessary delays. The aim will always be to ensure a quick resolution to the benefit of all concerned; the nature, seriousness and complexity of the allegation will have a bearing on timescales.
- In the first instance, and always prior to any internal investigation taking place, the school will contact the [LADO at Suffolk County Council](#) on the central telephone number **0300 123 2044** for further professional advice and discussion with one working day. We will discuss with the LADO the content and context of the allegation and will agree a course of action including any involvement with the Police. Discussions will be recorded in writing and communication with both the individual and parents of the child/children agreed. For the avoidance of doubt, the school does not require parental consent before reporting allegations to the LADO.
- In the case of serious harm, the Police will be informed from the outset.

- Where appropriate, the person who is subject of an allegation will be notified as soon as is practicable and will be provided with as much information as possible at that time (NB in some instances the school may not be permitted to disclose full details).
- Suspension will never be a default option; the school will always consider whether the circumstances warrant suspension and/or reasonable alternative arrangements (such as redeployment or working under supervision) are appropriate before a final decision is given in this regard. The LADO's views will always be taken into consideration. However, as DSL, the Principal will always have the final decision on suspension. The individual will be notified of the reasons and justification for suspension and provided with a named contact within one working day.
- Allegations that are found to have been malicious will be removed from personnel records. We will not refer to any unsubstantiated, unfounded or malicious allegations in employer references. (Pupils making malicious allegations will be dealt with under the school's behaviour policy).
- Whilst care will be taken to ensure the effective protection of the child making the allegation, we will always provide appropriate support to the person who is the subject of the allegation.
- There are restrictions on the reporting or publishing of allegations against staff and the school will take all reasonable steps to ensure that confidentiality is maintained and guard against unwanted publicity while an allegation is being investigated. These restrictions apply up to the point where the accused is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case.
- If the subject of an allegation chooses to resign their employ, the school will continue with its investigation and will make every effort to reach a conclusion regardless of whether the individual chooses to assist the investigation.

## Protecting yourself against allegations of abuse

You should seek to keep your personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children especially in a boarding setting:

- work in a room where there is a glass panel in the door or leave the door open
- make sure that other adults visit the room occasionally
- avoid working in isolation with children unless thought has been given to safeguards
- must not give out personal mobile phone numbers, other than boarding staff in connection with trips and visits or private email addresses
- must not give pupils lifts home in your cars
- must not arrange to meet them outside of school/boarding hours
- must not chat to pupils on social networking websites
- must not have pupils as friends on any social networking site

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

Any use of physical force or restraint against pupils will be carried out and documented in accordance with the Safe Restraint Policy. If it is necessary to use physical action to prevent a child from injury to themselves or others parents will be informed.

Children will not be punished by any form of hitting, slapping, shaking or other degrading treatment.

## Whistleblowing

The school aims to create and maintain an environment where staff feel supported in their safeguarding role and able to raise concerns, including about poor or unsafe practice and potential failures in the school's safeguarding regime.

The school has a separate Whistleblowing Policy (**Annex 7 - Whistleblowing Policy**) which is contained within the staff handbook; a copy may also be requested in confidence. All staff are required to report to the Principal, or proprietor in the Head's absence, any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk or abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

## Curriculum

The proprietor will ensure that children and young people are taught about safeguarding, including online safety, through teaching and learning opportunities as part of a broad and balanced curriculum. This is in order to help children stay safe, recognise when they do not feel safe and identify who they might or can talk to.

This may include covering relevant issues through Relationships Education and Relationships and Sex Education (also known as Sex and Relationship Education) and through Personal, Social, Health and Economic education (PSHE).

The proprietor will also ensure there is a comprehensive curriculum response to e-safety issues, enabling children and young people and their parents to learn about the risks of new technologies, communication and social media and how to use these responsibly.

The school will ensure that there are appropriate filters and monitoring systems in place to safeguard children and young people from potentially harmful and inappropriate online material.

## Touching

For the purpose of this section touching is used to mean every day acts of communication by physical means to indicate approval, affection or sympathy. There can be no doubt that a pat on the shoulder, a held hand or even an arm around the shoulder can be a powerful and appropriate action. Touching can be a positive reinforcement to relationships and a comfort in times of stress. It is acknowledged that close contact between a child and an adult is more part of normal practice in Early Years settings. Staff will be sensitive to aspects of culture, religion, gender and age that can impact on sensitivity towards touching.

Staff will themselves identify many class-based activities in which it is helpful or even essential to touch pupils. They will include:

- Modelling pencil grips/scissor grips
- Ensuring technology tools are held correctly
- Supporting in PE / swimming
- Holding a partner in gymnastics
- Developing the kinaesthetic required to work in clay
- Taking a pulse in science
- PSHE work on trust
- Working with communication disordered pupils

All such activities are legitimate and staff will be supported in their proper use.

Younger and more immature children (particularly those with disturbed, chaotic or inconsistent behaviour) will, from time to time, need physical direction. They may, for instance, be led to a room where they do not wish to be. They may need to be diverted from disruptive or destructive behaviour by being led away by the hand, arm or by means of an arm around the shoulder. Any holding of the arm should be done on a long bone and any pressure on the delicate wrist bones should be avoided. Aggressions, pain or painful 'locks' against joints must not be used to gain compliance.

Please refer to the **Brookes UK Safe Restraint Policy** for further guidance.

## Intimate Care

When working with young children and babies in Early Years, or from time to time with older children, such as in a boarding environment, it is necessary to help those who have wet themselves, soiled themselves, or need underwear changing because they have a period. Staff should take the following precautions because the child may require you to be in a discreet space with them. No person should undertake intimate care without a DBS. No volunteer should undertake this work.

- Always ask a child if they would like help and who from?
- Be sensitive to the embarrassment of a child and try to be matter of fact and calm. The dignity and privacy of the child are of paramount consideration at all times, including with other children.
- Remember that from Early Years we promote independence at every age group and this is a fundamental Montessori principle.
- Always tell a colleague if you need to escort a child to a toilet to assist them.
- If entering any kind of toilet area (including the door to a toilet room) staff should knock and announce their name and that they are coming in.
- Plan and get what they need before you go to help them sort it out (spare underclothes are kept in the classrooms and in the Medical Centre)
- Always assume that a child can take their own pants off and clean themselves.
- Encourage a child to do everything for themselves and provide the equipment and clothes they may need
- Always report back to that staff member when you have finished.
- Always let a parent know of the incident and record in the child's incident log
- Unless it is absolutely necessary do not get into a toilet cubicle with a child
- There is no issue of gender of staff in assisting children but their opinion on whether they want your help or help from someone else should be sought. In the boarding house and in games lessons, wherever possible we would aim to have same sex adults supervising changing and ablutions.
- If a toilet cubicle is being used by a child, the child should be allowed to continue using it undisturbed.
- If a child has soiled themselves (faeces) this is a potential sign of abuse or psychological distress and it must be reported as a potential Child protection issue to the DSL.
- If a child lacks the independence to deal with his/her toileting needs this would need an EHC or PSP (personal support plan) and must therefore be referred to SENCO
- If staff are actually cleaning up a child because this is what is needed and the child cannot do it, the staff must wear gloves.
- Bodily waste must be disposed of down the toilet or nappies put in the yellow sacks and put in the yellow bin.

## Use of Mobile Phones and Cameras

We take steps to ensure that there are effective procedures in place to protect children, young people and vulnerable adults from the unacceptable use of mobile phones and cameras in the setting. Please refer to **Acceptable Use of ICT and Mobile Devices and Social Networking by Staff** and the **Boarding Handbook**.

### Personal mobile phones

- Personal mobile phones belonging to members of staff are not to be used in classrooms during working hours. All phones must be switched to silent during teaching time. Early Years staff put their phones in their cloakroom area during their time in the classroom. Use of mobile phones is only allowed in staff rooms, offices or where there are no children present
- A school phone will be supplied for outings, for use in the case of an emergency, it must not be used to make or receive personal calls as this will distract them
- Members of staff will not use their personal mobile phones for taking photographs of children.
- Parents and visitors are requested not to use their mobile phones whilst on the premises. There is an exception if a visitor's company or organisation operates a lone working policy that requires contact

with their office periodically throughout the day. Visitors will be advised of a quiet space where they can use a mobile phone, where they can get a signal, and where there are no children present.

- Workmen will be accompanied whilst they are using their phones.
- Any person using a phone onsite must be challenged.

### **Cameras and videos**

- Members of staff must not bring their own cameras or video recorders into the school, unless they have prior permission from the Principal.
- Photographs and recordings of children are only taken for valid reasons, i.e. to record development, for displays within the setting or for publicity purposes.
- Photographs or recordings of children are only taken on equipment belonging to the school
- Where parents request permission to photograph or record their own children at school, permission will first be gained from all parents for their children to be included. This permission is sought annually through the data collection forms procedure.
- Photographs and recordings of children are only taken of children if there is written permission

## **Related Policies and Documents**

### **Related Documents**

Staff Code of Conduct  
Complaints Policy  
Whistleblowing Policy  
Special Educational Needs Policy  
Missing Children Policy  
Safer Recruitment Policy  
Behaviour Policy  
Safe Physical Restraint Policy  
Preventing and Tackling Bullying Policy  
First Aid Policy  
PSHE Curriculum  
E Safety Policy  
Missing Child Policy  
Confidentiality and Information Sharing  
Retention and Destruction Policy

### **Related Documents**

ICT Code of Practice Agreement  
Acceptable Use of ICT and Mobile Devices and Social Networking by Staff  
Acceptable Use of ICT and Mobile Devices and Social Networking by Students x2  
Multi-Agency Practice Guidelines: Female Genital Mutilation  
Child Sexual Exploitation DfE February 2017  
Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges September 2018  
Children Missing in Education Guidance September 2016  
Boarding Schools – National Minimum Standards 2015  
Boarders Handbook

## Expert and Professional Organisations

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on its own website [www.nspcc.org.uk](http://www.nspcc.org.uk). Schools and colleges can also access guidance on the issues listed below via the GOV.UK website. <https://www.gov.uk>

The [BSA](#) offer guidance and advice on boarding matters.

### Additional Advice and Support

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

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	<a href="#">Trafficking: safeguarding children</a>	DfE and HO guidance
Drugs	<a href="#">Drugs: advice for schools</a>	DfE and ACPO advice
	<a href="#">Drugs strategy 2017</a>	Home Office strategy
	<a href="#">Information and advice on drugs</a>	Talk to Frank website
	<a href="#">ADEPIS platform sharing information and resources for schools: covering drug (&amp; alcohol) prevention</a>	Website developed by Mentor UK
“Honour Based Violence”  (so called)	<a href="#">Female genital mutilation: information and resources</a>	Home Office
	<a href="#">Female genital mutilation: multi agency statutory guidance</a>	DfE, DH, and HO statutory guidance
	<a href="#">Forced marriage: information and practice guidelines</a>	Foreign Commonwealth Office and Home Office
Health and Wellbeing	<a href="#">Fabricated or induced illness: safeguarding children</a>	DfE, Department for Health and Home Office
	<a href="#">Rise Above: Free PSHE resources on health, wellbeing and resilience</a>	Public Health England resources
	<a href="#">Medical conditions: supporting pupils at school</a>	DfE statutory guidance
	<a href="#">Mental health and behaviour</a>	DfE advice
Homelessness	<a href="#">Homelessness: How local authorities should exercise their functions</a>	HCLG
Online	<a href="#">Sexting: responding to incidents and safeguarding children</a>	UK Council for Child Internet Safety
Private fostering	<a href="#">Private fostering: local authorities</a>	DfE – statutory guidance
Radicalisation	<a href="#">Prevent duty guidance</a>	Home Office guidance
	<a href="#">Prevent duty advice for schools</a>	DfE advice



	<a href="#">Educate Against Hate Website</a>	DfE and Home Office
Violence	<a href="#">Gangs and youth violence: for schools and colleges</a>	Home Office advice
	<a href="#">Ending violence against women and girls 2016-2020 strategy</a>	Home Office strategy
	<a href="#">Violence against women and girls: national statement of expectations for victims</a>	Home Office guidance
	<a href="#">Sexual violence and sexual harassment between children in schools and colleges</a>	DfE advice
	<a href="#">Serious violence strategy</a>	Home Office Strategy

# Annex 1

## TYPES OF ABUSE AND NEGLECT (AS IDENTIFIED IN KCSiE)

### Abuse

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

#### Physical Abuse

This can involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

#### Emotional Abuse

This is 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 children 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 the child's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child from participating in normal social interactions. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Evidence of abuse could be:

- Excessively clingy or attention seeking
- Very low self-esteem or excessive self-criticism
- Withdrawn behaviour or fearfulness
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders or self-harm

### Neglect

This is the persistent failure to meet a child's basic physical and/or psychological needs likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### Sexual Abuse

This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging

children to behave in sexually inappropriate ways, 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.

## **INDICATORS OF ABUSE**

### **Physical Indicators of Neglect**

(Many indicators listed in the physical abuse section can also indicate neglect.)

- abandonment
- lack of shelter
- unattended medical and dental needs
- consistent lack of supervision
- ingestion of cleaning fluids, medicines, etc.
- consistent hunger
- nutritional deficiencies
- inappropriate dress for weather conditions
- poor hygiene
- persistent (untreated) conditions (e.g. scabies, head lice, diaper rash, or other skin disorders)
- developmental delays (e.g. language, weight)
- irregular or non-attendance at school or child care
- not registered in school
- not attending school
- underweight and is very small for their age
- if they are regularly left alone, or in charge of younger brothers or sisters

### **Behavioural Indicators of Neglect**

- depression
- poor impulse control
- demands constant attention and affection
- lack of parental participation and interest
- delinquency
- misuse of alcohol/drugs
- regularly displays fatigue or listlessness, falls asleep in class
- overeats when food is available
- steals food, or begs for food from classmate(s)
- reports that no carer or parent is at home
- frequently absent or late
- self-destructive
- drops out of school (adolescent)
- takes over adult caring role (of parent)
- lacks trust in others, unpredictable
- plans only for the moment

### **Indicators of Physical Abuse**

Bruises, black eyes and broken bones are obvious signs of physical abuse. Other signs might include:

- Injuries that the child cannot explain or explains unconvincingly
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen, face
- Bruising which looks like hand or finger marks or have the shape of an object
- Cigarette burns, human bites
- Scalds and burns.

- presence of several injuries (3+) that are in various stages of healing
- repeated injuries / accidents over a period of time
- injuries not consistent with the child's age and development
- bald patches on child's head where hair may have been torn out
- injuries where the child and parents' account of their happening differ

### **Behavioural indicators of Physical Abuse**

- Child is sad, withdrawn or depressed
- Has trouble sleeping
- Behaves aggressively or is disruptive
- Shows fear of certain adults
- Has a lack of confidence and low self-esteem
- Uses drugs or alcohol
- Attempts to run away and fear of going home
- Stilted conversation, vacant stares or frozen watchfulness, no attempt to seek comfort when hurt
- Describes self as bad and deserving to be punished
- Lack of confidence and low self esteem
- Cannot recall how injuries occurred, or offers an inconsistent explanation
- Wary of adults or reluctant to go home
- Often absent from school/child care
- May flinch if touched unexpectedly
- Extremely aggressive or withdrawn
- Displays indiscriminate affection-seeking behaviour
- Abusive behaviour and language in play
- Overly compliant and/or eager to please
- Poor sleeping patterns, fear of the dark, frequent nightmares
- Cries frequently
- Drug/alcohol misuse
- Poor memory and concentration
- Depression
- Suicide attempts

### **Indicators of Sexual Abuse**

#### **Physical**

- pain, itching, bruising or bleeding in the mouth or genital or anal areas
- genital discharge or urinary tract infections
- stomach pains or discomfort walking or sitting
- sexually transmitted infections
- fatigue due to sleep disturbances
- sudden weight change
- cuts or sores made by the child on the arm (self-mutilation)
- recurring physical ailments
- difficulty in walking or sitting
- torn, stained or bloody underwear
- pregnancy

#### **Behavioural**

*In a younger child:*

- sad, cries often, unduly anxious
- poor concentration
- inserts objects into the vagina or rectum

- change or loss of appetite
- sleep disturbances, nightmares
- excessively dependent
- fear of home or a specific place, excessive fear of men or women, lacks trust in others
- age-inappropriate sexual play with toys, self, others (e.g. replication of explicit sexual acts)
- age-inappropriate sexual language
- age-inappropriate, sexually explicit drawings and/or descriptions
- bizarre, sophisticated or unusual sexual knowledge
- reverts to bed wetting/soiling
- dramatic behavioural changes, sudden non-participation in activities
- poor peer relationships, self-image
- overall poor self-care
- absence from school
- child talks of receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person

*In an older child:*

- sudden lack of interest in friends or activities
- fearful or startled response to touching
- overwhelming interest in sexual activities
- hostility toward authority figures
- fire setting
- need for constant companionship
- regressive communication patterns (e.g. speaking childishly)
- academic difficulties or performance suddenly deteriorates
- truancy and/or running away from home
- wears provocative clothing or wears layers of clothing to hide bruises (e.g. keeps jacket on in class)
- recurrent physical complaints that are without physiological basis (e.g. abdominal pains, headache, nausea)
- lacks trust in others
- unable to "have fun" with others
- suicide attempts
- drug/alcohol misuse
- poor personal hygiene
- promiscuity
- sexual acting out in a variety of ways

## **Indicators of Emotional Abuse**

*Physical*

- bedwetting and/or diarrhoea
- frequent psychosomatic complaints, headaches, nausea, abdominal pains

*Behavioural*

- mental or emotional development lags
- behaviours inappropriate for age
- fear of failure, overly high standards, reluctance to play
- fears consequences of actions, often leading to lying
- extreme withdrawal or aggressiveness, mood swings
- overly compliant, too well-mannered
- excessive neatness and cleanliness
- extreme attention-seeking behaviours

- poor peer relationships
- severe depression, may be suicidal
- runaway attempts
- violence is a subject for art or writing
- complains of being left out
- contact is forbidden with other children
- low self esteem

## Annex 2

### Further information on Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

**Indicators:** there is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44) focuses on the roles of schools and colleges.

Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.

**Actions:** If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. When mandatory reporting commences in October 2015 these procedures will remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

Mandatory Reporting Duty Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. The mandatory reporting duty will commence in October 2015. Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's DSL and involve Children's Social Care as appropriate.

## Annex 3

### Further Information on Preventing Radicalisation – ‘Prevent’

Protecting children from the risk of radicalisation should be seen as part of schools’ wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel Programme. (Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation).

#### Prevent

From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (“the CTSA1 2015”), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 (“the Prevent guidance”). Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools (but also cover childcare). It is anticipated that the duty will come into force for Sixth Form Colleges and FE colleges early in the autumn. The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation.

These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.

The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of LSCBs. The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism.

As a minimum, however, schools should ensure that the DSL undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally. The Department for Education has also published advice for schools on the Prevent duty.



The advice is intended to complement the Prevent guidance and signposts other sources of advice and support. Channel School staff should understand when it is appropriate to make a referral to the Channel programme. (Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.)

An individual's engagement with the programme is entirely voluntary at all stages. Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to cooperate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

## Annex 4

### E-Safety

The growth of different electronic media in everyday life and an ever developing variety of devices including PC's, laptops, mobile phones, webcams etc. place an additional risk on our children.

Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and young people with a view to grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.

Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children, most recently via 'sexting' and should be a concern to all those working with pupils at this school.

Pupils can engage in or be a target of bullying using a range of methods including text and instant messaging to reach their target. Mobile phones are also used to capture violent assaults on other children for circulation (happy slapping).

### Protection is Prevention

- Software is in place to minimise access and to highlight any person accessing inappropriate sites or information.
- Pupils will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns the schools designated child protection teacher should be informed immediately)
- Pupils should not give out their personal details, phone numbers, schools, home address, computer passwords etc.
- Pupils should adhere to the school policy on mobile phones.

The police will be involved if there is any criminal element to misuse of the internet, phones or any other form of electronic media.

We actively manage our hardware, software and connectivity as follows:

### Roles

The Principal and IT Manager have defined roles and responsibilities for online safety.

### Guidance

Guidance on the use of technology in the classroom (Desktop Computers and iPads, interactive whiteboards etc.) is provided to teaching and support staff and in turn to students.

### Infrastructure

The school uses leading edge internet and network security systems. The structured network, wireless provision (staff, student and guest networks) are controlled using these systems.

Areas of control:

- Web filtering;
- Antivirus and Malware protection;
- Internet search security with full logging and reporting using government keyword database query for Prevent, e-safety and disclosure;
- BYOD management;

- Mobile Phone management (staff and student);
- Building control and security;
- Data protection including GDPR
- Network penetration (external);

## **Software**

Industry standard specialist educational softwares are provided for staff and students across all areas of the school including:

- Curriculum delivery;
- Internet Browsers;
- Peer to peer file sharing (internal);
- School MIS/CRM

Please refer to the IT Systems Management Audit for further information.

## Annex 5 - Part 1

### Staff Code of Conduct

#### INTRODUCTION

This Code of Conduct is intended as a guide and a help to all school staff. It sets out standards of conduct which staff are expected to follow when within, or representing the School. This code is not exhaustive but is written to assist staff and it is important that staff should take advice and guidance if necessary. If in doubt, ask.

The underlying purpose is to ensure that the School provides a high quality service to its pupils, students and families in accordance with the Vision, Values and Mission Statement and to promote confidence in the integrity of the School.

- It takes in the requirements of the law and attempts to define the required levels of professionalism to ensure the wellbeing of the School, its staff and families.
- It has been drafted to comply with School Policies and Procedures.
- Staff are requested to read this Code carefully and consider the issues which it raises.
- The Principal will also ensure that all staff are aware of the Code's contents and are fully briefed on its implications.
- Reference to this Code will be made in all contracts of employment, and copies will be given to all staff. In addition, the induction programme for all new staff will reinforce the principles of this Code.
- Investigations of alleged breaches of this Code will be covered under the School's Disciplinary procedures and related codes of practice.

#### CODE OF CONDUCT

- Staff's off-duty hours are their personal concern, even if living on the school site, but they should avoid a position where duty and private interests conflict. This includes:
  - Staff members making online associations/friendships with current pupils via social networking sites such as Facebook, Bebo and MySpace is not permitted.
  - Staff members using texting/email facilities on either their mobile phone or PC/Mac to communicate with current pupils or past pupils is not permitted.
- The above have been included to safeguard the safety of pupils and the safety and professional integrity of school staff.
- The School does not seek to preclude staff unreasonably from undertaking additional employment but you are required to devote your full time, attention and abilities to your duties during your working hours and to act in the best interests of the School at all times. Accordingly, you must not, without the written consent of the Principal, undertake any employment or engagement which might interfere with the performance of your duties or conflict with the interests of the School.
- It follows that, regardless of whether you are employed on a full-time or part-time contract, you are required to notify the Principal of any employment or engagement which you intend to undertake whilst in the employment of the School. (including any such employment or engagement which commenced before your employment began with the School).

#### SPECIFIC ASPECTS

**Discrimination:** Staff must at all times observe the School's Equal Opportunities Policies for staff and pupils and treat pupils, parents and other stakeholders in accordance with those policies.

**Health and Safety:** Staff must take care of their personal hygiene, safety and welfare, and that of other persons who may be affected by their acts or omissions. All staff must comply with the requirements of the School Health and Safety policy and relevant legislation and regulations, and also ensure that pupils do likewise.

**Fire:** Staff must familiarise themselves with the fire precautions, procedures and drill routines. They must regard practice fire drills or building evacuations in a positive manner, and ensure they are perceived by pupils as an essential precaution to prevent risk of injury or fatality.

**Business Practice:** Staff must maintain an impeccable standard of integrity in all their professional relationships.

**Media:** Other than on matters of publicity, only the Principal is authorised to speak or send any communication on behalf of the School to members of the press or broadcast media. This decision is to avoid any embarrassment or unfair pressure on staff. This authorisation may be extended by the Principal to other staff members.

**Copyright:** Staff shall observe copyright laws on computer software, audio-visual and printed material.

**Data Protection Act:** It is the responsibility of all employees to ensure the School's compliance with the Data Protection Act. Personal data must only be used to assist you to carry out your work; it must not be given to people who have no right to see it. All staff should maintain the security of all computerised databases of information on individuals, whether they are staff, pupils or members of the general public. Staff should refer any queries to the Principal.

### General Points

- Staff should display the highest possible standards of professional behaviour that is required in an educational establishment (see also **Annex 5 - Part 2**).
- Staff should seek to co-operate with their colleagues, providing support, help and guidance as required by them and their line manager, and enable effective communication throughout the School.
- Staff must not use their position in the School for private advantage or gain.
- Staff must avoid words and deeds that might bring the School into disrepute or might undermine colleagues in the perception of others (staff/pupils/parents/community).
- Staff must retain professional independent objectivity and not promote dogma or political bias to others in their working activities.
- Staff must be aware of, and must follow School policies systems and procedures. They should normally communicate through the line management structure, and should ensure pupils do likewise.

Continuing professional development and support shall be provided by the School and, where appropriate and agreed, will be based on the objectives of the School Development Plan. Periodically, employees will be required to attend certain training activities.

Staff should attend their place of work punctually in accordance with their conditions of service and at the times agreed with their line manager. Those unable to avoid being late or absent should, whenever possible, give as much notice to the Principal so that alternative cover arrangements may be made.

### Administrative Duties

- Teaching staff shall maintain and properly complete a register for all classes. The attendance register must be completed using the electronic system at the start of the morning and afternoon sessions. If the system fails to open, a paper register must be completed and sent immediately to the administration office.
- In order to ensure safeguards both for staff and pupils, staff must obtain permission from the Principal:
  - before taking pupils off the School premises;
  - before arranging for any visiting speakers;
  - before incurring any expenditure on behalf of the School.

## **Confidentiality**

Staff shall maintain the appropriate levels of confidentiality with respect to student and staff records and other sensitive matters. They should take care not to discuss issues of particularly sensitive matters within the School community which could cause distress to School staff, pupils or parents.

## **When in doubt, ask!**

If any member of staff is in any doubt with regard to the guidelines of this Code, and how they apply in any particular situation, then please consult with the Principal. It is re-emphasised that this Code is intended to be a help and to enable fairness and equity between all staff.

## Annex 5 - Part 2

### PROFESSIONAL BEHAVIOUR

Professional behaviour is a generic term, but within this Code of Conduct includes such aspects as:

- acting in a fair, courteous and mature manner to pupils, colleagues and other stakeholders;
- co-operating and liaising with colleagues, as appropriate, to ensure pupils receive a coherent and comprehensive educational service;
- endeavouring to assist the School achieve its corporate and strategic objectives – in particular, by adopting a positive attitude to marketing and the achievement of quality and equality;
- respect for School property;
- maintaining the image of the School through standards of dress, general courtesy, correct use of School stationery, etc.;
- taking responsibility for the behaviour and conduct of pupils in the classroom and sharing such responsibility elsewhere on the premises;
- being fit for work;
- being familiar with job requirements (eg proper preparation, use of suitable methods/systems, maintenance of appropriate/required records, etc), including keeping up-to-date with developments relevant to the job.
- being familiar with communication channels and School procedures applicable to both pupils and staff;
- ensuring all assessments/exams/tests are conducted in a fair and proper (prescribed) manner, and that procedures are strictly followed with respect to confidentiality and security;
- respect for the rights and opinions of others.

This list is not exhaustive but the examples are given as a summary.

### DISCIPLINARY RULES

The following are examples of behaviour which the School finds unacceptable. The list is not exhaustive and it is acknowledged that it will be necessary to exercise judgement in all cases and to be fair and reasonable in all the circumstances:

- Any form of physical/verbal violence towards pupils.
- Physical violence, actual or threatened towards other staff or visitors to the School.
- Sexual offences, sexual insults or sexual discrimination against pupils, other staff or visitors to the School.
- Racial offences, racial insults or racial discrimination against pupils, other staff or visitors to the School.
- Theft of School monies or property and of monies or property of colleagues or visitors to the School. Removal from School premises of property which is not normally taken away without the express authority of the Principal or of the owner of the property may be regarded as gross misconduct.
- Deliberate falsification of documents such as time sheets, bonus sheets, subsistence and expense claims for the purpose of gain.
- Acceptance of bribes or other corrupt financial practices.
- Wilful damage of School property or of property belonging to other staff or visitors.
- Wilful disregard of safety rules or policies affecting the safety of pupils, other staff or visitors to the School.
- Any wilful act which could result in actionable negligence for compensation against the School.
- Refusal to comply with reasonable instructions given by staff with a supervisory responsibility.
- Gross neglect of duties and responsibilities.
- Unauthorised absence from work.
- Being untruthful and/or engaging in deception in matters of importance within the School community.

- Deliberate breaches of confidentiality particularly on sensitive matters.
- Being incapable by reason of alcohol or drugs (not prescribed for a health problem) from fulfilling duties and responsibilities of employment.
- Conduct which substantially brings the name of the School into disrepute or which seriously undermines confidence in the employee.

The following are examples of behaviour which could lead to formal disciplinary warnings:

- Unsatisfactory time keeping without permission.
- Neglect of safety rules and procedures. Some offences of wilful neglect may be regarded as gross misconduct.
- Breaches of confidentiality. Deliberate breaches on sensitive matters may be regarded as gross misconduct.
- Failure to comply with reasonable work related requirements or lack of care in fulfilling the duties of the post.
- Behaviour towards other employees, pupils, and visitors which gives justifiable offence. Certain behaviour giving rise to offence may be regarded as gross misconduct.
- Acting in a manner which could reasonably be regarded as rude, impolite, contemptuous or lacking appropriate professional demeanour. In certain circumstances such behaviour may be regarded as gross misconduct.
- Conduct which it is considered adversely affects either the reputation of the School or affects confidence in the employee. Certain conduct may be regarded as gross misconduct



## Annex 6

### Role of Designated Safeguarding Leads

The overarching 'Lead' Designated Safeguarding person (Lead DSL) is **Mrs Natalie Taylor**, Principal, Brookes UK. He is responsible for the implementation of this policy.

The Lead DSL has explicit responsibility for matters relating to safeguarding, and in his absence, Deputy DSLs are **Mr Frederick Walton** and **Mrs Susanne Walton** (Boarding Parents) **Mrs Jenny Donlon** (Cherry Trees).

The KCSI guidance Annex B sets out the broad areas of responsibility to which our DSLs are asked to comply with, having regard for our internal safeguarding policy and in liaison with the Lead DSL as appropriate:

Governing bodies, proprietors and management committees should appoint an appropriate senior member of staff, from the school or college leadership team, to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection. This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

### Deputy Designated Safeguarding Leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding lead(s). Any deputies should be trained to the same standard as the designated safeguarding lead.

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

### Manage referrals

The designated safeguarding lead is expected to:

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

### Work with others

The designated safeguarding lead is expected to:

- liaise with the Principal to inform him or her 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 designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

## Training

The designated safeguarding lead (and any 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 designated safeguarding lead should undertake Prevent awareness training.

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, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

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

## Raise Awareness

The designated safeguarding lead should:

- ensure the school or college's child protection policies are known, understood and used appropriately;
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection 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 or college in this;
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

## Child protection file

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

## Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

# Annex 7

## Whistleblowing Policy

### Introduction

Whistleblowing has been defined as:

*'The disclosure by an employee or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the workplace, be it of the employee or his/her fellow employees' (Public Concern at Work Guidelines 1997).*

Statutory protection for employees who whistleblow is provided by the Public Interest Disclosure Act 1998 ("PIDA"). The PIDA protects employees against victimisation if they make a protected disclosure within the meaning of the PIDA and speak out about concerns about conduct or practice within the school which is potentially illegal, corrupt, improper, unsafe or unethical or which amounts to malpractice.

This policy applies to all school staff including full and part time, casual, temporary or substitute staff and to individuals undertaking work experience in the school.

### Aims and Scope of Policy

Brookes UK is committed to high standards in all aspects of the school and will treat whistleblowing as a serious matter. In line with the school's commitment to openness, probity and accountability, members of staff are encouraged to report concerns which will be taken seriously, investigated and appropriate action taken in response.

### This policy aims to:

- Give confidence to members of staff about raising concerns about conduct or practice which is potentially illegal, corrupt, improper, unsafe or unethical or which amounts to malpractice or is inconsistent with school standards and policies so that they are encouraged to act on those concerns
- Provide members of staff with avenues to raise concerns
- Ensure that members of staff receive a response to the concerns they have raised and feedback on any action taken
- Offer assurance that members of staff are protected from reprisals or victimisation for whistleblowing action undertaken in good faith and within the meaning of the PIDA.

This policy covers whistleblowing relating to alleged:

- Unlawful conduct
- Miscarriages of justice in the conduct of statutory or other processes
- Failure to comply with a statutory or legal obligation
- Potential maladministration, misconduct or malpractice
- Health and safety issues including risks to the public as well as risks to pupils and members of staff
- Action that has caused or is likely to cause danger to the environment
- Abuse of authority
- Unauthorised use of public or other funds
- Fraud or corruption
- Breaches of financial regulations or policies
- Mistreatment of any person
- Action that has caused or is likely to cause physical danger to any person or risk serious damage to school property
- Sexual, physical or emotional abuse of members of staff or pupils
- Unfair discrimination or favouritism
- Racist incidents or acts, or racial harassment

- Any attempt to prevent disclosure of any of the issues listed.

The PIDA sets out the full statutory rights and obligations of members of staff wishing to whistleblow. Where members of staff are unclear about any of the PIDA requirements they should seek further advice. Public Concern at Work is an independent charity that provides free advice for persons who wish to express concerns about fraud or other serious malpractice (telephone 0207 404 6609 or [www.pcaw.co.uk](http://www.pcaw.co.uk)). Members of staff could also approach their trade union for further advice.

### **Safeguard Against Reprisal, Harassment and Victimisation**

The school will not tolerate harassment or victimisation of members of staff when matters are raised in accordance with the PIDA provisions. Any member of staff who victimises or harasses a member of staff as a result of their having raised a concern in accordance with the whistleblowing policy will be dealt with under the school's staff disciplinary procedures.

The PIDA provides protection to employees in circumstances where their disclosure can be classed as a protected disclosure. Under the PIDA it would be automatically unfair to dismiss or make any employee/member of staff redundant because they had made a protected disclosure; and that it would be unlawful to subject them to any other detriment, such as demotion or a fine. In the event of such action an Employment Tribunal has the power to order reinstatement, re-engagement or order the award of compensation to successful claimants.

### **Confidentiality**

The school recognises that members of staff may want to raise concerns in confidence and will do its utmost to protect the identity of members of staff who raise a concern and do not want their name disclosed. However, investigation into the concern could reveal the source of the information; and statements may be required from the member of staff as part of the evidence, which would be seen by all parties involved. If the investigation leads to prosecution and the whistleblower is likely to be called in to give evidence in court.

Brookes UK will not place members of staff under pressure to give their name and will give due consideration to proceeding with investigating the concern on the basis of an anonymous allegation

### **Anonymous Allegations**

Staff should put their name to allegations whenever possible as anonymous concerns are much less powerful. Nonetheless anonymous allegations will be considered under this whistleblowing procedure especially concerns raised relating to the welfare of children. In relation to determining whether an anonymous allegation will be taken forward Brookes UK will take the following factors into account:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources, and obtaining information provided.

### **Untrue and Malicious/Vexatious Allegations**

If a member of staff makes an allegation in good faith but it is not confirmed by further inquiry the matter will be closed and no further action taken. If, however, the inquiry shows that untrue allegations were malicious and/or vexatious or made for personal gain then Brookes UK will consider taking disciplinary action against the member of staff.

### **Allegations Concerning Child Protection Issues**

If a member of staff raises a concern related to a child protection/safeguarding issue, the Principal or Senior Designated Person for safeguarding should urgently consult the LA officer designated to lead on child protection (or if they are not available the designated manager for child protection in the authority's social services

department) so that the action for the handling of such allegations under the school's disciplinary procedure for staff and the child protection procedures established by the Local Safeguarding Children's Boards can be initiated.

However, in relation to child protection issues, it is open to the member of staff to make a direct referral to the social services designated manager either before raising their concern with the school or where the Principal fails to do so after raising their concern and the member of staff remains concerned about the situation.

### **Procedure for Making a Whistleblowing Allegation**

You should raise your concern with your line manager, the Principal or the SDP for safeguarding. The person to be approached depends to an extent on the seriousness and sensitivity of the issue and who is thought to be involved.

If you feel you cannot express your concerns within the school, it is open to you to raise your concern with someone outside the school setting from the list of organisations in the section of this policy 'Taking the Matter Further', with key organisations to contact suggested as the LEA, Public Concern at Work and the trade unions. However, where the concern relates to a child protection/safeguarding matter, if you do not want to raise this through the school, you must consult the LA officer designated to lead on child protection or if that person is not available, the local authority's designated social services manager for child protection. If the concern needs to have Police or other statutory authority involvement, the whistleblowing process will be halted until the statutory authorities have completed their investigations and confirmed that it is. If possible put your concern in writing for the avoidance of doubt. You should set out the background and history of the concern, giving names, dates and places where possible, and explaining the reason for your concerns. If you feel unable to put the matter in writing you can still raise your concern verbally and should telephone or arrange to meet the appropriate person. You can also ask your trade union or professional association to raise the matter on your behalf or to support you in raising the concern.

### **Response to Whistleblowing**

The matter raised may:

- Need inquiry internally in the school
- Need to be passed to the Police if it relates to alleged criminal activity
- Need to be passed to the person in the LA who deals with complaints about financial management or financial propriety in schools
- Need to be referred to the LA officer designated to lead on child protection/safeguarding if there is a concern relating to child protection, or if that person is not available the local authority's designated social services manager for child protection.

At this stage concerns/allegations are neither accepted nor rejected.

### **Timescale for Response**

The person appointed by the Principal to look into whistleblowing allegations will normally provide a written response to you within 5 working days (except in the case of anonymous allegations):

- Acknowledging that the concern has been received
- Indicating how it is proposed to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Advising whether any enquiries have been made
- Advising whether further enquiries will take place
- Informing you of support available whilst matters are looked into, and
- Maintaining confidentiality wherever possible, but also explaining that it may not be possible that you can remain anonymous.

## The Inquiry Process

- The appointed person, who may be an SLT or Board Member, will:
- Look into the allegation - seeking evidence and interviewing witnesses as necessary.
- Maintain confidentiality wherever possible but will be mindful that there is no guarantee that the whistleblower can remain anonymous.
- If appropriate, bring the matter to the attention of the LA appointed person dealing with complaints about financial management of schools.
- If appropriate, for concerns of criminal behaviour refer the matter to the Police.
- If appropriate, for concerns of child protection/safeguarding, refer the matter to the LA officer designated to lead on child protection/local authority social services designated manager for child protection. The whistleblowing process will be halted until the statutory authorities have completed their investigations and confirmed that it is appropriate to continue with the whistleblowing process.

If the person appointed needs to talk to you, you are permitted to be accompanied by a trade union or professional association representative or a fellow member of staff not involved in the area of work to which the concern relates.

The target is to complete the inquiry within 10-15 working days from the date of the initial written response. If the enquiry extends beyond the timescales outlined for specific reasons all individuals concerned will be notified of this in writing with an indication when the inquiry will be completed.

## The Inquiry Report

Following completion of the inquiry process the person appointed will make a written report and submit normally within 5 working days. The report will not contain the whistleblower's name unless you have expressly stated that you wish to be named.

Following receipt of the inquiry report, the Principal will convene a committee with at least one other SLT or Board Member and an independent person from outside the school to consider the inquiry report and decide on the action to be taken. This should normally take place within 5 - 10 working days following receipt of the inquiry report.

Following notification of the committee's decision, the Principal will notify you of the outcome normally within 5 working days (except in relation to anonymous allegations), setting out the action to be taken or that no further action is to be taken and the reasons why.

## Taking the Matter Further

If no action is to be taken and/or you are not satisfied with the way the matter has been dealt with, you can make a complaint under the school's complaints procedure or raise your concerns with other organisations as listed below:

- The local authority
- A relevant professional body or regulatory organisation such as the General Teaching Council
- The Children's Commissioner
- The Public Services Ombudsman
- The Police - for concerns of criminal behaviour
- A trade union or professional association
- Public Concern at Work (an independent charity that provides free advice for persons who wish to express concern about fraud and other serious malpractice. Telephone 0207 404 6609 or [www.pcaw.co.uk](http://www.pcaw.co.uk)).