

SWANBOURNE HOUSE



7 SAFEGUARDING POLICY

Applicable to the Early Years Foundation Stage

Review of Safeguarding Arrangements:

January 2015 – S. Vale, Independent Child Protection Consultant

November 2015 – S Cole, ISI Consultancy

Date	September 2020
Review Date	September 2021
Custodian	Director of Pastoral Care

To be read in conjunction with:

- Safer Recruitment (B12)
- Employee Handbook (B4)
- Keeping Children Safe in Education (September 2020)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892394/Keeping_children_safe_in_education_2020.pdf

Amendments

Amendment	Date	Description
1	Apr 2014	Bringing together of a number of previously disparate policies; updating in line with KCSiE and latest ISI guidance
2	Aug 2014	Tidying up and formatting of the policy; addition of Staff Code of Conduct – Interaction with Pupils at Appendix 3
3	Dec 2014	Mobile phone update & Safeguarding statement
4	Jan 2015	CPO to DSL Anstee to Stanton-Tonner Appendix 4 – Mobile devices
5	Apr 2015	WB updates following review by S Vale
6	May 2015	WB updates following scrutiny by SHS Ed Committee
7	Aug 2015	Annual review & updates – WB, SH
8	Sep 2015	Update following latest ISI guidance
9	Nov 2015	Update following ISI Consultancy report
10	Jan 2016	Amendment Appendix 2, mobile phone use
11	Apr 2016	A Owens added as Deputy Designated Safeguarding Lead
12	Apr 2016	ISI recommendations
13	Aug 2016	Update in line with new KCSiE guidance
14	Feb 2017	LADO telephone number changed
15	Oct 2017	Review and update – new safeguarding mobile number included
16	Apr 2019	Reviewed & updated – new DSL and DDSL information added
17	Sep 2019	Reviewed and updated to adhere to new ISI guidance and KCSiE 2019
18	Feb 2020	Review & updated – new DSL information added
19	Sep 2020	Reviewed & updated to adhere to new ISI guidance and KCSiE 2020. New DSL information added

Mission and Vision

To unlock and develop the confidence and individual talents of each child.

1. To nurture every pupil, enabling them to be resilient and build self-worth, through the widest variety of opportunities.
2. To provide our pupils with an engaging, collaborative and progressive teaching and learning community based on mutual respect, an understanding of individual needs and the willingness to rise to challenge.
3. To ensure both day and boarding pupils are well prepared within the context of a character and values education for their next school and adult lives in a fast-moving and challenging globalised world.

Safeguarding Statement

Swanbourne House maintains the highest standards of safeguarding to ensure all children develop in a secure environment, with a robust support network and sympathetic culture, where they are listened to and encouraged to talk.

1. Aims

The policy ensures that the school recognises and implements:

- The school's commitment to acting in the best interests of the child;
- The maintenance of a safe environment in which children can learn, develop, are listened to and encouraged to talk;
- A support network, so that children are confident there are adults to whom they can talk to if feeling worried;
- Raising awareness of Child Protection (CP) issues and equipping children with the skills needed to keep them safe;
- Guidance for staff on the support of children who have been abused;
- Safe recruitment procedures in compliance with regulations;
- Development, monitoring and review of procedures for identifying and reporting cases, or suspected cases of abuse;
- Any deficiency in CP policy or procedure is recognised and remedied.

2. Definitions

Safeguarding:

- Preventing the impairment of children's health and development by ensuring they grow up in circumstances consistent with the provision of safe and effective care.

Child Protection:

- Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Child:

- All children on the roll at Swanbourne House, including EYFS.

Staff:

- All staff at Swanbourne House including full-time, part-time, temporary, volunteers, junior staff and Governors.

3. Policy Guidance

This policy has regard to:

- Staff and Employee Handbooks
- *Keeping Children Safe in Education* (September 2020) (KCSIE)
- KCSIE incorporates the additional statutory guidance, *Disqualification under the Childcare Act 2006* (September 2018)

- KCSIE also refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015)
- *Working Together to Safeguard Children* (September 2018 – updated in 2019 but without changing the date on the published version) (WT)
- WT refers to the non-statutory but important advice: *Information sharing* (2018)
- *Prevent Duty Guidance: for England and Wales* (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
- *The Prevent duty: Departmental advice for schools and childminders* (June 2015)
- *The use of social media for on-line radicalisation* (July 2015)

4. Policy and Procedure Review

Policy and procedures are adjusted on an ongoing basis by the DSL on receipt of guidance from DfE, ISI, IAPS and local children's social care authorities and are in accordance with locally agreed interagency procedure. In addition, the policy is reviewed twice termly by the Swanbourne House Safeguarding Committee (Head, DSL, DDSLs, and DCP Governor) and annually, by the Board of Governors. If there were to be a substantiated allegation against a member of staff, the school would work with the Local Authority Designated Officer to determine whether any improvements to the school's procedures or practice need to be made.

5. Policy Availability

Swanbourne House Safeguarding Policy is available:

- On the Swanbourne House website
- School Office
- DSL's office
- DDSLs' office (Deputy Head's Office)

6. Designated Persons

Safeguarding matters should be referred immediately to:

Designated Safeguarding Leads (DSL)

Mrs R Nicoll – *Director of Pastoral Care [SLT]*

rnicol@swanbourne.org – 07732 600379. In the absence of a DSL, child protection matters are referred to:

Deputy Designated Safeguarding Lead (DDSL)

Mrs Jane Thorpe – *Head [SLT]*

head@swanbourne.org – 01296 720264

or

Deputy Designated Safeguarding Lead (DDSL)

Mr Matthew Phillips – *Assistant Head – Director of Music [SLT]*

mphillips@swanbourne.org - 01296 720360

or

Deputy Designated Safeguarding Lead (DDSL)

Mrs Justine Mitchener – *SEND Co*

jmitchener@swanbourne.org - 01296 720264

or

Deputy Designated Safeguarding Lead (DDSL)

Miss Sarah North – *Head of EYFS*

snorth@swanbourne.org – 01296 720 835

or

Deputy Designated Safeguarding Lead (DDSL)

Mrs Simone Mitchell – *Deputy Head – Director of Teaching and Learning [SLT]*

smitchell@swanbourne.org – 01296 720264

or

Deputy Designated Safeguarding Lead (DDSL)

Miss Helen Grace – *School Nurse*

hgrace@swanbourne.org – 01296 720264

or

Deputy Designated Safeguarding Lead (DDSL)

Mr Edward Selby-Lowndes – *Resident Boarding Tutor*

eselby-lowndes@swanbourne.org – 01296 720264

The Governing Board has designated a Governor to lead on Safeguarding issues - this is currently Mrs Sue Tyler.

The main responsibilities of the Designated Safeguarding Lead are outlined in Appendix 6. Members of this team meet fortnightly to discuss any safeguarding matters arising.

7. Local Children Safeguarding Board Referral Contacts

Bucks Safeguarding in Education:

Educational Safeguard Advisory Service (ESAS) 01296 382912

Buckinghamshire Family Information Service (Levels 1&2) 01296 383065

First Response (office hours) (Levels 3&4) 0845 4600001

First Response (emergency hours) 0800 9997677

Safeguarding Officer - LADO 01296 382070

secure-LADO@buckscc.gcsx.gov.uk

Milton Keynes LADO 01908 253169/253170

Central Beds LADO 0300 300 4833

Northampton MASH 0300 126 1000

Oxfordshire Schools LADO 01865 815956

Other useful contacts include:

Non-emergency police number 101

DfE telephone helpline (for non-emergency advice) 020 7340 7264

DfE mailbox (for non-emergency advice) counter-extremism@education.gsi.gov.uk

8. Training

- The DSLs and DDSLs are trained every two years in child protection and inter-agency working. Training is provided by the local social services department and approved external welfare agencies. This includes training on the part of the DSL in regard to the school's Prevent duty with reference to pupil radicalisation. DSL attends termly Independent Schools Safeguarding Forums (ISSF) at which there are always cross-agency presentations, training and updates.
- All staff who work with children are trained in child protection at least every three years with regular updates (at least annual) in regard to new legislation. KCSiE Part One is taken as the starting point for all staff; all staff are required to read KCSiE Part One and further briefings are designed to support staff understanding of safeguarding issues. School leaders and staff who work directly with children have also read Annex A of KCSiE 2020. Updates are usually provided at start of term staff days in briefings led by DSL or DDSLs. More detailed training will be delivered by an outside agency or the DSL and DDSLs. The content of this training is discussed with the three Safeguarding Partners (the local authority (LA), a clinical commissioning group (CCG) in the area and a chief of police for a local force) and will cover types of abuse and neglect, children missing from education, child sexual exploitation, female genital mutilation, prevent radicalisation and the specific procedures of Swanbourne House school.

- Prior to formal training with the DSLs, all new staff, temporary staff and volunteers who work with children are issued with written Child Protection guidelines, a copy of this policy, the staff code of conduct, the identity of the Senior and Deputy Designated Safeguarding Lead and a copy of Part 1 of Keeping Children Safe in Education.
- Temporary and voluntary staff are made aware of the school's procedures.
- Pupils - all top year pupils receive basic CP awareness training from the DSLs; all pupils are made aware of safeguarding issues through Tutorial sessions and through PSHE and online safety education.

9. Safer Recruitment Procedure

Swanbourne House School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and the ISI guidance in Part 4 of the regulations concerning the suitability of staff, supply staff and proprietors. All members of the teaching and support staff at the school, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are checked with the Disclosure and Barring Service before employment. In addition those Governors, Volunteer Helpers and adult members of the families of members of staff who live on site and have contact with children are also checked with the DBS.

This policy works in conjunction with the Swanbourne House Safer Recruitment Policy B12.

The recruitment administrator obtains assurance that appropriate child protection checks and procedures including training apply to all staff employed by outside organisations using school facilities e.g. Sports camps, and any supply staff used by the school.

Standard application forms are required of all applicants for positions in the school and CVs are not accepted. References are taken up using a standard reference form prior to interview whenever possible and job descriptions and person specifications are provided to referees. Identity checks, qualifications, right to work in the UK and the completion of a medical questionnaire are carried out at the time of the interview where possible. Safeguarding questions are included at every interview and the school aims to ensure at least one person on every interview panel has been trained in safer recruitment. As of September 2020, those staff trained are Hollie Licqurish, Justine Michener, Matt Phillips and Karen Hart. References and career history are scrutinised as part of the recruitment process for potential staff.

When responding to a request by potential employers for current or past staff who may be/have been under suspicion of being unsuitable to work with children, they are advised to contact the Disclosure and Barring Service (DBS) and NCTL. The School fulfils its legal duty to respond to requests from the DBS for any information it has on record for new referrals after 20th Jan 2009 or existing referrals at 20th Jan 2009 where barring was not automatic.

Disqualification and disqualification by association:

This is addressed in the Swanbourne House Safer Recruitment Policy B12.

10. Types of abuse and neglect

All staff are made aware that abuse, neglect and safeguarding issues are rarely standalone events than can be covered by one definition or label. In most cases multiple issues will overlap with one another. We recognise that abuse can take place wholly online and that technology may be used to facilitate offline abuse.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

11. Concerns About a Child

All pupils at Swanbourne House School are made aware of the opportunities they have to express their concerns through speaking to members of staff, contacting the School Counsellor, Independent Listener or Independent Helplines. Telephones around the school list the Childline contact number. Any member of staff may become aware of a child in distress or suspicious that a child may have been maltreated. The abuse or suspected abuse may have taken place at home, school or elsewhere. It may involve parents, relations, staff, other adults or pupils. The welfare of the child at risk is the first priority.

If any member of staff is approached by a child who wishes to tell them a worry of this kind, they should:

- Take the concerns seriously and listen sympathetically;
- Do not offer confidentiality and explain that you may have to inform someone else;
- Do not ask leading questions;
- Do not make promises
- Write the report of the meeting, adding signature and the date;
- Immediately report to DSL or in her absence one of the DDSs.

Early help is recognised as essential in any situation where there are concerns about a child. This will mean that the school will seek to provide support as soon as a problem emerges at any point in a child's life. In the first instance staff should discuss the need for early help with the DSL. Early help may involve support from the class

teacher or personal tutor or from another member of the staff who is able to offer suitable pastoral counselling; judgment as to the member of staff with whom a particular child is likely to be most open will be exercised. It may be necessary to involve external counselling support for a child – this may be the School Listener or a representative of an external agency. The engagement of parents at this stage will also be considered.

These are some of the signs and behaviours which may indicate that a child is being abused (neglect, physical, sexual, emotional or a combination thereof):

- repeated minor injuries;
- children who are dirty, smelly, poorly clothed or who appear underfed;
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums;
- an air of 'detachment' or 'don't care' attitude;
- overly compliant behaviour;
- a 'watchful attitude';
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play;
- a child who is reluctant to go home, or is kept away from school for no apparent reason;
- does not trust adults, particularly those who are close;
- 'tummy pains' with no medical reason;
- eating problems, including over-eating, loss of appetite;
- disturbed sleep, nightmares, bed wetting;
- running away from home, suicide attempts;
- self-inflicted wounds;
- reverting to younger behaviour;
- depression, withdrawal;
- relationships between child and adults which are secretive and exclude others;
- a change in behavioural pattern;
- pregnancy.

These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

Staff should be aware of the issues in regard to mental health which may show themselves in anxiety, eating disorders, concerns over body image and self-harm which may be particularly prevalent amongst full and weekly boarders.

Staff should be particularly alert to pupils' relationships with each other and the potential for peer abuse within the Boarding House as well as across the rest of the school. Staff should also note that children with SEN and disabilities are more likely to be abused or neglected and should be especially alert to the well-being of pupils on the SEND list and ensure that there is early intervention to give support if there are any concerns.

Staff are to report any Safeguarding concerns about a child to the DSL or DDSL immediately, and before the end of the working day. The DSL will be in a position to make a judgement on whether the matter needs to be referred to external agencies, and indeed whether the child is safe to go home.

Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator

always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Children Missing from Education

A child going missing from education is a potential indicator of abuse or neglect. The school has a duty to inform the local authority of any pupils who:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

Looked After Children

The school ensures that in the case of any "looked after" children being educated by the school there are sufficient measures in place. There will be a designated member of staff who has the training, skills, knowledge and understanding necessary to support and keep LAC children safe. This designated member of staff has responsibility for their welfare and progress and has up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents and delegated authority to carers. The designated member of staff attends regular review meetings with the local authority and designated person from the Virtual School. In the academic year 2020-2021 the school has no "looked after children".

Female Genital Mutilation (FGM)

Staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Signs and behaviours which may indicate that a child is at risk or has undergone FGM:

- A girl may talk about pain or discomfort between her legs
- Be particularly reluctant to undergo normal medication examinations.
- Prolonged absence from school with noticeable behaviour changes
- Frequent urinary or stomach problems
- A girl confiding that she is attending a special occasion

If any member of staff is approached by a child who wishes to tell them about abuse or a worry of this kind, they should:

- Take the concerns seriously and listen sympathetically;
- Do not offer confidentiality and explain that you may have to inform someone else;
- Do not ask leading questions;
- Do not make promises
- Write the report of the meeting, adding signature and the date;
- Immediately report to DSL or in her absence DDSs.

If a member of staff discovers that an act of FGM appears to have been carried out, they should report the matter to the police. Unless there is good reason not to, the member of staff should in these circumstances continue to follow the school's normal safeguarding procedures.

Preventing Radicalisation

The school recognises its duty under the Counter-Terrorism and Security Act to have due regard to the need to prevent people from being drawn into terrorism and forms of extremism. The school builds pupils' resilience to radicalisation (the process by which people come to support terrorism and the forms of extremism leading to terrorism) by promoting fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs, and enabling them to challenge extremist views. This is done in an age appropriate way and takes place in Chapel, Assemblies, through discussions in tutor groups and through open debate and learning about British values in the classroom.

The school's Senior Leadership Team has conducted a risk assessment regarding radicalisation, and the school maintains awareness of the importance of promoting British values through the curriculum and other elements of school life, has built awareness of radicalisation into IT policies, and has sought appropriate training for the DSL and works in partnership with the Safeguarding Partners to maintain awareness in this area. All staff receive a briefing on Prevent at Inset and are directed to KCSIE September 2020 for further guidance.

Staff should be aware of the following issues which may be signs of radicalisation:

- expression of views by a child or the child's family members which suggest that a child may be susceptible or exposed to a terrorist ideology
- changes in children's behaviour which could indicate that they may be in need of help or protection
- seeking to hide their views
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views

If staff have concerns about children's vulnerability to radicalisation they should report this to the DSL as with other safeguarding concerns.

Online Safeguarding Risks

The school recognises that the use of technology has become a significant component of many safeguarding issues including child sexual exploitation, radicalisation and sexual predation. There are three broad areas of risk:

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

The school seeks to ensure that there are appropriate internet filters and monitoring of internet use in place. Similarly there is a clear policy on the use of mobile technology in school such that day pupils do not bring their own devices into school and boarders have restricted use at specified times.

The pupils are taught as part of the Computing and PSHE schemes of work about the risks of online technology and how to keep themselves safe online. In addition we have a programme of external speakers (from organisations such as Childnet) to come in to speak to the children. Staff are regularly briefed concerning online safety and issues to be aware of in regard to pupil behaviour online.

12. Allegations of Abuse by One or More Children Against Another Child / Peer on Peer Abuse

Bullying is unacceptable behaviour and staff are referred to the procedures in the Anti-Bullying Policy. Abuse is abuse and should not be tolerated or passed off as banter or merely part of growing up; equally the gendered nature of some peer on peer abuse is deemed unacceptable and will be taken seriously. Where there is reasonable cause to suspect that a child is suffering any form of abuse, or likely to suffer significant harm then staff follow the procedures laid out in this policy. Staff are also encouraged to keep in mind the potential for online abuse, sexting (including upskirting), sexual violence, sexual harassment, physical abuse, initiation / hazing type violence and rituals, or other forms of abuse made possible by social media. Victims and perpetrators will be supported by showing that staff take these matters extremely seriously and will always look to address and deal with instances of peer on peer abuse. All instances of bullying or physically aggressive behaviour will be logged by the DSL. All staff seek to educate the children to minimise the risk of peer on peer abuse, including through assemblies, our PSHE programme and Personal Tutor programme.

13. Reporting and Referral Arrangements

Safeguarding is everyone's responsibility. Once a concern has been raised by a member of staff concerning a child, it is the responsibility of the DSLs or DDSLs to make a decision about referring the matter to the Local Safeguarding Children Board. Any member of staff may make a direct referral to external agencies and the contact details of the LADO are therefore included in this policy; staff who make their own referral should inform DSL that they have done so. Parental consent is not required to make a referral to statutory agencies. If at any time there is a risk of immediate serious harm to a child a referral will be made to Children's Social Care immediately. If a crime may have been committed the matter will be reported to the Police.

Staff who are speaking to a child who has raised an issue of safeguarding concern about themselves or another pupil should never promise that they will not tell anyone about an allegation. It will not be appropriate to promise unconditional confidentiality as information will need to be shared with relevant staff in school and perhaps with children's social care.

Staff will report concerns to the DSL or to a DDSL. During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. In exceptional circumstances this discussion could be by phone or email, but face to face discussion is preferred. Contact details are made available to staff including the Safeguarding Mobile Phone Number: 07732 600379 In the DSL's absence from school the DDSLs should be aware and make themselves available for staff to raise any safeguarding concerns.

It may be that advice is sought from the Local Authority Designated Officer (LADO) concerning borderline cases. It will always be the case that the school will seek to ensure that children receive the right help at the right time, to address risks and prevent issues escalating, to act on early signs of abuse and neglect, to keep clear records, to listen to the views of the child, to reassess concerns when situations do not improve and to share information quickly.

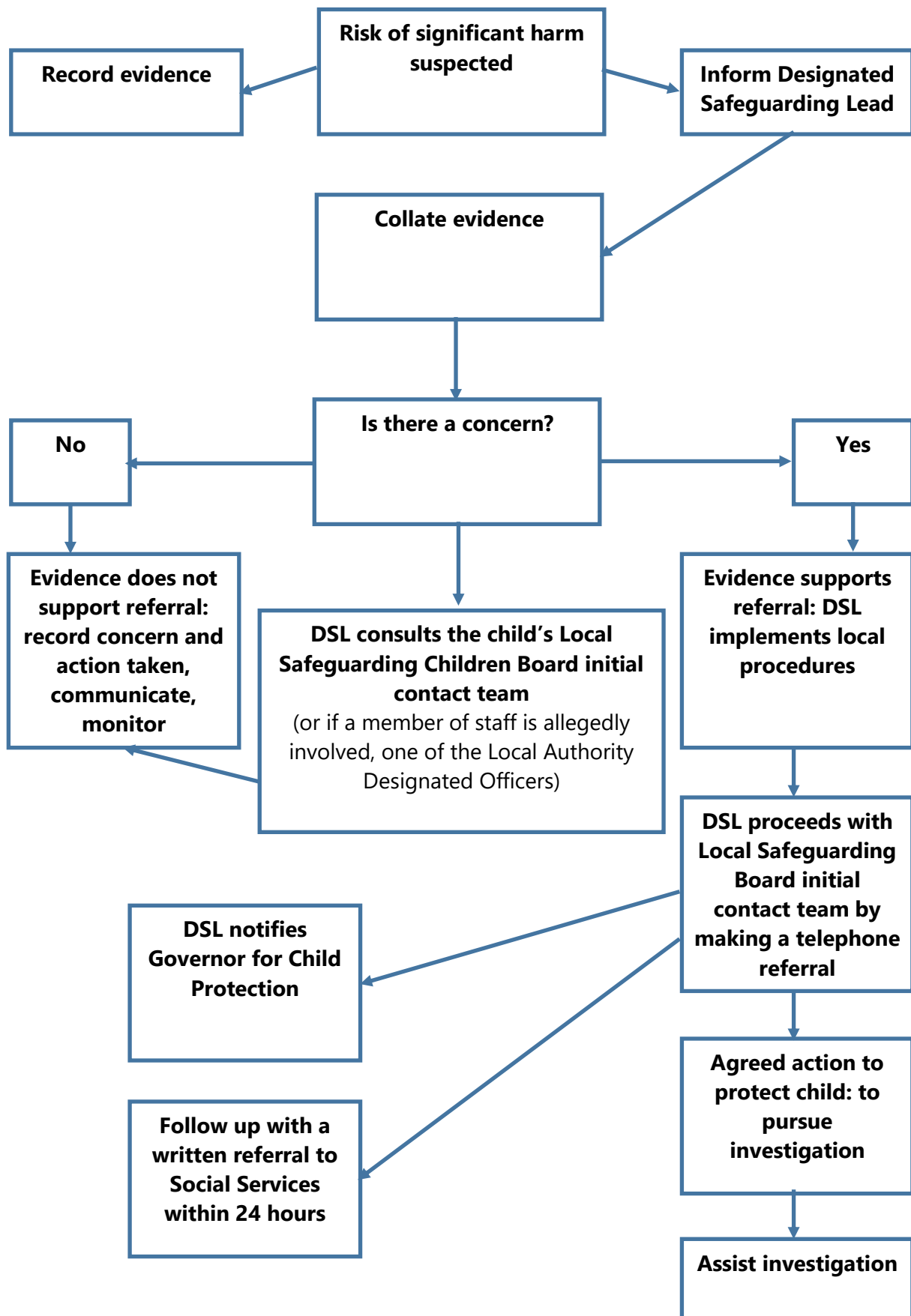
The school recognises that there is a difference between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. The former will be reported via the LADO to Children's Social Care agencies or the police immediately, whereas the latter will lead to inter-agency assessment such as the "Common Assessment Framework" and "Team around the Child" approaches.

With reference to the guidelines for dealing with allegations of abuse made against a person who works with children the DSL should report to the Local Authority Designated Officer (LADO) (p.2 – Local Safeguarding Board Referral Contacts) within 1 working day. Reporting criteria are met if any person who works with children, in connection with his/her employment or voluntary activity, has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

The LADO will advise the DSL when/if the parents or carers should be informed, and if the police are to be informed.

Diagrammatic Representation of the School's Internal Procedures



14. Allegations of Abuse Against a Member of Staff (see also Appendix 1)

If an allegation is made against a member of staff the quick resolution is a clear priority for the benefit of all concerned. Swanbourne House does not undertake their own investigations of allegations without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. All allegations are reported straight to the Head. The Chairman of Governors receives reports in the absence of the Head, or in cases where the Head is the subject of the allegation or concern. The Head will not be informed that he is the subject of the allegation or concern at this stage. Procedures include contact details for the LADO. If the allegation is against the DSL, DDSL or the Chairman of Governors then it is reported to the Head and LADO.

- Swanbourne House follows the Local Authority procedures for managing allegations against staff, copies of which are kept by the DSL and DDSL.
- Any allegation made against a member of staff is to be taken immediately to the Head.
- The Head will discuss the content of the allegations with the Local Authority Designated Officer (LADO).
- Suspension of the member of staff against whom an allegation has been made will be very carefully considered before a decision is made. This decision will be made by the Governor responsible for Child Protection and the Head.
- The Head will refer the member of staff for counselling, outside the framework of the school.
- Allegations against the Head will go directly to the Chairman of Governors and suspension will be considered by the Governors.
- All staff should be aware of their duty to raise concerns about another staff member. This should be done through their line manager, Deputy Head or the DSL or DDSLs.
- Under National Minimum Standard 3, additional elements apply. The school will make arrangements for alternative accommodation away from children in cases where a member of boarding staff is suspended pending an investigation of a child protection nature.
- The school will report to the DBS, within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. The report includes as much evidence about the circumstances of the case as possible. Compromise agreements cannot apply in this connection. If a teacher is dismissed (or would have been dismissed if he or she had not resigned) for a reason which does not reach the threshold for referral to DBS, separate consideration will be given to a referral to the National College for Teaching and Leadership.
- The school understands that ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

15. Whistle Blowing

The school's Whistle Blowing Policy (see Employee Handbook - B4) makes it clear that it is the duty of employees and volunteers to report any concerns or allegations about behaviour of colleagues or practices which are likely to put children at risk of abuse or serious harm. The whistle blower is guaranteed confidentiality until, or if, the police are informed. Where a member of staff feels unable to raise a whistleblowing issue within school or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them including the NSPCC whistleblowing helpline (0800 028 0285). The Whistle Blowing Policy is part of the induction of new staff.

16. EYFS

For clarity, with specific reference to Early Years Foundation Stage, the following points apply:

- Personal mobile phones belonging to the EYFS staff are not to be used throughout contact time with the children and are put out of sight.

- EYFS Staff are not permitted to use recording equipment on their personal mobile phones to take photos or videos of EYFS children they are to use school recording equipment for all observational records.
- The ban on the use of mobile phones in the EYFS setting extends to all visitors and parents; signs are in place to enforce this.
- If any allegations against people living or working at the school are made, the School understands its duty to inform Ofsted of such allegations as soon as practicable and with 14 days at the latest.

Appendix 1

Procedure When a Member of Staff, Volunteer, Safeguarding Lead or Head Faces Allegations of Abuse

1. Introduction

Allegations that a member of staff has abused a pupil or pupils either inside the school premises or during a school trip or visit could be made by:

- Parents
- The abused pupil
- Other members of staff
- Other pupils
- The Police or Social Services
- A third party

An allegation of such seriousness would normally be made directly to the Head; but if another member of staff is told first, he/she will ensure that the Head is informed immediately. The Local Area Designated Officer should then be informed. If the Head is implicated, the Chairman of Governors should be told at once. The Local Area Designated Officer should then be informed, without informing the Head. In all cases, the School would not investigate before referral to the LADO.

2. Anonymous Allegations

Any anonymous allegation of child abuse which names both a member of staff and a child, will be dealt with as per policy procedure. The member of staff will be interviewed if the allegation names the member of staff, but not the pupil. It could be appropriate to establish a mentoring or review programme for that individual, or to provide him or her with further training. A record would be kept on the individual's personal file.

3. First Response

Response will be prompt and sensitive to the legitimate concerns of the victim and his or her family. We undertake to:

- Take any allegation of abuse, involving a member of staff, seriously;
- Establish the facts;
- Contact the LADO for advice re: procedure;
- Inform the member of staff concerned honestly of the allegation that has been made, and advise him or her to contact their Trade Union or Professional Association for advice and support;
- Suspension will be considered;
- Inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place.

4. Suspension

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Suspension will follow legal advice where:

- There is a serious risk of harm (or further harm) to the child;
- The allegations are so serious as to constitute grounds for dismissal, if proven;
- The police are investigating allegations of criminal misconduct.

In addition:

- Any member of staff who is invited to a meeting whose outcome is likely to result in his or her suspension, is entitled to be accompanied by a friend or Trade Union representative. Staff do not have a right to legal representation;
- Boarding school, or other accommodated staff, who are suspended will be required to remain off-site for the duration of their suspension.

- The suspended member of staff will be kept informed of the progress of the investigation.

5. Alternatives to Suspension

- Sending the member of staff on leave;
- Considering non-contact duties;
- Second adult present when staff member has contact with children.

6. Resignation

The resignation of a member of staff or volunteer mid-way through an investigation would not lead to the investigation being abandoned.

7. Compromise Agreements

The policy at Swanbourne House School is to follow the KCSIE September 2020 guidance on the use of compromise agreements in cases of child abuse which is:

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. A referral to the DBS must be made, if the criteria are met. If the accused person resigns or their services cease to be used and the criteria are met it will not be appropriate to reach a settlement/compromise agreement. A settlement/compromise agreement which prevents the school or college from making a DBS referral when the criteria are met would likely result in a criminal offence being committed as the school or college would not be complying with its legal duty to make the referral. "

8. Referral to the Disclosure and Barring Service / Teaching Regulation Agency

Swanbourne House has a statutory legal duty to refer an individual, where there is the risk that he or she may harm, or has caused harm to children, to the Disclosure and Barring Service (DBS) and National College of Teachers and Lecturers (NCTL) within one month of the individual's dismissal or resignation because he or she has been considered unsuitable to work with children. Reports concerning members of staff or volunteers are normally made by the DSL. If the DSL is implicated, the report is made by the Head. If the Head is implicated, the report is made by the Chairman of Governors.

The referral form can be downloaded from the DBS. The school plays no part in the subsequent process of barring individuals from working with children and/or vulnerable groups. We also have a legal duty to respond to any requests for information that we receive from the DBS and NCTL at any time.

In the case of a proven case of professional misconduct, a report would be made to the Teaching Regulation Agency by the Head, or, in the case of the Head facing such a case, by the Chair of Governors.

9. Recording

All allegations of abuse, investigations and any disciplinary actions will be recorded on an individual's file. A copy will be given to the individual and he or she will be told that the record will be retained until he or she reaches statutory retirement age, or for ten years, if that is longer.

Due regard is taken concerning public statements about child protection with reference to the Education Act of 2011.

10. Discipline and Suitability Process

The LADO and the DSL should discuss whether an internal disciplinary investigation is appropriate in cases where:

- It is clear at the outset or when decided by a strategy discussion, that a Police investigation or Social Care enquiry is not necessary, or
- The employer or the LADO is informed by Police or the Crown Prosecution Service (CPS) that a criminal investigation and any subsequent trial is complete, or that an investigation is to be closed without charge, or a prosecution discontinued, or
- Where the Police and CPS formally agree to a disciplinary investigation running concurrently with their own investigations.

The discussion should consider any potential misconduct and/or suitability issues on the part of the member of staff and take into account:

- Information provided by the Police and/or Social Care.
- The result of any investigation or trial.
- The different standard of proof in disciplinary and criminal proceedings.

If formal disciplinary action is not required, the school will institute appropriate action **within 3 working days**. If a disciplinary hearing is required, and further investigation is not required, the hearing should be held **within 15 working days**.

If further investigation is needed to decide upon disciplinary action, the DSL and the LADO should discuss whether the school has appropriate resources or whether the school should commission an independent investigation because of the nature and/complexity of the case and in order to ensure objectivity.

The aim of an investigation is to obtain, as far as possible, a fair, balanced and accurate record in order to consider the appropriateness of disciplinary action and/or the individual's suitability to work with children. Its purpose is not to prove or disprove the allegation.

The investigating officer should aim to provide a report **within 10 working days**.

On receipt of the report the school will decide **within 2 working days**, whether a disciplinary hearing is needed. If a hearing is required, it should be held **within 15 working days**.

If at any stage, new information emerges that requires a child protection referral, the disciplinary investigations should be held in abeyance and only resumed if agreed with Social Care and the Police. Consideration should again be given as to whether suspension is appropriate in light of the new information.

11. Supply, Contract and Volunteer Workers

In the case of supply, contract and volunteer workers, normal disciplinary procedures may not apply. In these circumstances, the LADO and employer should act jointly with the providing agency, if any, in deciding whether to continue to use the person's services, or provide future work with children, and if not whether to make a report for consideration of barring or other action.

12. Sharing Information for Disciplinary Purposes

Wherever possible, Police and Social Care should, during the course of their investigations and enquiries, obtain consent to provide the employer and/or regulatory body with statements and evidence for disciplinary purposes.

If the Police or CPS decide not to charge, or decide to administer a caution, or the person is acquitted, the Police should pass all relevant information to the employer without delay.

If the person is convicted, the Police should inform the employer straight away so that appropriate action can be taken.

13. Unsubstantiated Allegations

Both the child and member of staff may feel isolated, vulnerable and with diminished self-esteem.

Child A professional care programme will be recommended.

Staff A mentoring programme and professional counselling will be offered. A short period of re-training or a short sabbatical may be appropriate.

14. Allegation of Abuse by a Member of Staff Against a Child who is not a Pupil at Swanbourne House

Procedure would be the same as for an allegation with a Swanbourne pupil except that the school would not take part in any investigatory process.

15. Allegation of Abuse by the Head or DSL

The Head or DSL would normally be suspended for the duration of the investigatory process.

Appendix 2

Guidance on Pupil and Staff acceptable use of ICT, Mobile Phones and Other Electronic Devices

1. Statement

Technology plays an enormously important part in the lives of all young people. Sophisticated games consoles, or PSPs (play stations portable), like Wiis and Nintendo DS, together with internet-enabled mobile phones provide unlimited access to the Internet, to SMS messages, to blogging (web logging) services (like Twitter), to Skype (video calls, via web cameras built into computers, phones and PSPs), to wikis (collaborative web pages), chat rooms social networking sites (such as Facebook and Instagram) and video sharing sites (such as YouTube).

Technology has transformed teaching and learning in all educational settings. It is a crucial component of every academic subject, and is taught as a subject in its own right. All classrooms are equipped with electronic whiteboards, projectors and computers. We store laptops and iPads in lap trucks outside of classrooms. We have computing suites in the school and pupils may use the machines there and in the library for private study. There are also computers in other locations around the school (for example in the Music Room). Our Boarding House is equipped with some computers too.

2. Aims

We believe this communications revolution gives young people unrivalled opportunities but we are aware that it also brings risks. It is an important part of our role at Swanbourne House School to teach our pupils how to stay safe in this environment as per their developmental age and how to avoid making themselves vulnerable to a range of risks, including identity theft, bullying, harassment, grooming, stalking and abuse. They also need to learn how to avoid the risk of exposing themselves to subsequent embarrassment.

3. Staff Mobile Phones and personal devices, including photography

- Staff may use their personal devices for work purposes e.g. retrieving material for lessons, checking the time, contacting the school during trips.
- Staff should use their personal devices for private business out of sight and away from children, other than in an emergency.
- Personal devices may not be used, other than in an emergency, in the children's toilets, nappy changing areas, pupil changing rooms, swimming pool or in the boarding dormitories and pupil common rooms.
- Personal mobile phones belonging to the EYFS staff are not to be used throughout contact time with the children and are put out of sight.
- EYFS Staff are not permitted to use recording equipment on their personal mobile phones to take photos or videos of EYFS children they are to use school recording equipment for all observational records.
- The ban on the use of mobile phones in the EYFS setting extends to all visitors and parents; signs are in place to enforce this.
- Staff may not use personal devices for taking photographs at school or of school events, nor will they store such images on their own computers or electronic devices at home. (It is understood that staff with children in school may take photographs of their children with their personal devices for use at home). There are a bank of school devices kept by some key senior staff which can be used for photography for marketing purposes;
- Staff are to be aware of any child who does not have consent for photographs;
- Personal phones may be used in the case of an emergency e.g. in the event of an evacuation of the building;
- No children's/parents numbers are to be stored on personal phones - If used, they must be deleted immediately;
- If mobile phones are left turned on, they must be on silent;

- Personal mobile phones must only be used on staff's designated breaks and must be used away from the children, other than in an emergency;
- Staff must not text, email or post anything on a website that could be construed to have an impact on the School's reputation;
- Staff must not text, email or post anything on a website that would offend any other member of staff, parent or member of the school community, e.g. intimidation or bullying.

To facilitate this policy mobile phones will be provided for each minibus and in the office for trips where minibuses are not required.

4. Technical Staff

With advances in technology, blocking and barring sites is no longer adequate. We need to teach all of our pupils to understand why they need to behave responsibly if they are to protect themselves. Our technical staff have a key role in maintaining a safe technical infrastructure at the school and in keeping abreast with the rapid succession of technical developments. Good practice and duty of care extends to monitoring and dealing with breaches of our policy, lawfully, should they arise. We recognise that Internet safety is a child protection and general safeguarding issue.

5. Illegal Material

Illegal activity will be reported to the police and/or the Local Child Safeguarding Board (LCSB). If any child is at specific risk as a consequence of online activity, we may seek assistance from the Child Exploitation and Online Protection Unit (CEOP).

Any child who misuses technology to bully, harass or abuse another pupil will be age appropriately sanctioned and/or given counselling.

6. Conflict with school business

School IT facilities cannot be used for private business or fund raising that is not supported by the school.

7. Parents and Guardians

Swanbourne House works closely with parents and guardians in promoting a culture of online safety.

"Children and young people need to be empowered to keep themselves safe. This isn't just about a top-down approach. Children will be children - pushing boundaries and taking risks. At a public swimming pool we have gates, put up signs, have lifeguards and shallow ends; but we also teach children how to swim." Dr Tanya Byron "Safer Children in a digital world: the report of the Byron Review".

Online safety is a whole school responsibility.

8. Cyberbullying

- Cyberbullying is a particularly unpleasant form of bullying, because it is direct to the child, can be anonymous and a victim can be targeted at any time or place.
- The Anti-Bullying Policy describes preventative measures and procedures that will be followed when there are cases of alleged bullying.
- Proper supervision of pupils plays an important part in creating a safe ICT environment at school; but everyone needs to learn how to stay safe outside the school.
- Alleged bullying and harassment in any form should always be reported to a member of staff.

9. Treating Other Users with Respect

- We expect pupils to treat staff and each other online with the same standards of consideration and good manners as they would in the course of face to face contact;
- Staff do not normally communicate on a personal basis with pupils by e-mail and we would not expect them to communicate with pupils by text or mobile phones;
- Everyone has a right to feel secure and to be treated with respect (Anti-Bullying policy on the Public and Parents' website);

- All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or worrying issue to a member of the pastoral staff.

10. Keeping the School Network Safe

- Certain sites are blocked by our filtering system;
- Any reported misuse/rumours of misuse of the network by pupils or staff is investigated by our IT Department;
- All prep school pupils are assigned their own email address, accessed with password protected personal login.

11. General Guidance

- No child should post anything that they would not say to their grandparent;
- PSHE lessons from the 10s+ show how pupils can identify signs of cyber-stalking, and what they should do if they are worried about being harassed or stalked online;
- 7s+ are taught safer social networking during Computing and PSHE lessons;

Children are taught how to:

- keep personal details safe;
- recognise and avoid unknown attachments and report illegal content;
- Activate mobile phone filters and block nuisance callers.

12. Pupil Mobile Phones

Swanbourne House is committed to safeguarding and promoting the welfare of children at School. As part of our Safeguarding policy we expect staff and pupils to follow this protocol on communication by mobile phone. Throughout this protocol, the word mobile phone includes a PDA or similar devices

Pupils are not allowed mobile phones in school.

Exceptions:

Boarders are allowed mobile phones which are signed into the Boarding House.

- Boarders' mobile phones are kept with the Boarding House Parents and can only be used with permission, and within designated areas.
- Boarders' iPads and other personal electronic devices are switched off and stored in the charging facility during the school day. They may be used in the Boarding House after school.

Sanctions:

- Mobile phones are confiscated from day pupils. These are handed in to the Assistant Head from whom parents may recover them;
- Staff may confiscate personal equipment that is being used during the school day from Boarders. These may be handed to the Boarding House Parents;
- Additional sanctions may be applied if appropriate.

13. Use of mobile phone communication between staff and pupils

- Staff should avoid using mobile phones to speak to pupils or to send them a message or vice versa, unless it is an emergency;
- Any messages that are sent should be brief and courteous;
- Staff should not send calls or texts of a personal nature to pupils or vice versa.

14. Emergencies

Staff on supervisory duties in the playground, on the playing fields or on trips may carry and use a mobile phone to seek assistance or pass messages in the case of emergencies, but it is understood that these devices should not be used for checking of emails or similar while carrying out supervisory duties.

15. Out of School Hours or on Activities

- Staff should avoid using mobile phones to speak to pupils, send a messages or vice versa outside School;
- Staff should not store pupil's mobile phone numbers;
- Any messages should be brief and courteous.

16. Inappropriate communication

- If there are reasonable grounds to believe inappropriate communications have taken place between staff and pupils or members of staff, the Head may require relevant mobile phones to be produced for examination.
- If there are reasonable grounds to believe a breach has occurred, the usual grievance or disciplinary procedures would apply in relation to either the safeguarding of pupils, vulnerable groups or harassment/bullying at work.

17. Inappropriate holding of numbers (Data)

- Parent or staff numbers used for professional reasons should be deleted from personal units after use;
- Colleagues numbers stored for personal reasons are to be held in confidence and not used whilst working;
- The Head (data controller) will advise if staff wish to e-communicate re: alleged harassment/bullying.

18. Guidance on Accessing Inappropriate Sites at School

- Staff may not access inappropriate material on the premises;
- Downloading inappropriate material will instigate disciplinary procedure;
- Concerns re: inappropriate sites or images used by staff or children are to be reported to either Assistant Head, Deputy Head or the Head;
- Staff are asked to refer to the Whistle Blowing Policy re: referrals of colleagues.

19. Guidance on Social Networking

- Pupils are not allowed to use social networking sites except as part of a lesson under direct supervision; pupils are educated about the safe use of social media and other aspects of online safety.
- Staff may use private devices during their own time and in child restricted areas;
- Staff may not be Facebook (or equivalent site, e.g. Instagram) friends with current pupils; it is good practice not to commit to such relationships with current parents too.
- Further guidance on social networking is offered by all leading unions.

Appendix 3

Staff Code of Conduct – Guidance on Interaction with Pupils

1. Introduction

Rigorous and detailed Education (Independent School Standards) Regulations 2014, EYFS and NMS Boarding Standards for child protection are intended to ensure the highest professional standards from teachers and others who are working in, helping in, or governing schools. The NSPCC's evidence in January 2009 to Sir Roger Singleton's "Review of Safeguarding arrangements in independent schools, non-maintained special schools and boarding schools" stated that:

"Alongside DBS checks, independent schools must maintain a culture of vigilance about risks to children and a clear understanding about appropriate interaction with children, challenging unacceptable behaviour, providing examples of good conduct and ensuring children and young people know where to turn if they have problems or are being abused."

2. Contents of Policy

The Swanbourne House School code of conduct provides guidance for teachers and other members of staff when faced with handling any issue relating to child abuse and to appropriate interaction with pupils. It is not intended to be a substitute for proper training. Training in child protection is an important part of the induction process for all new teaching and non-teaching staff and should be repeated every three years or less. It includes training in online safety, school policies (including the roles and identities of the DSLs and DDSLs), details of the Pupil Behaviour Policy and details of actions with regard to children missing from education. In addition all staff (teaching and non-teaching) receive regular safeguarding training, to ensure that they are kept up to date with the latest requirements, including Prevent and online safety.

3. Paramourncy

The safety and well-being of every pupil at Swanbourne House School is of paramount importance. Every child has the right to grow up and to live in a safe environment. All staff have a duty to protect pupils from abuse and bullying and to promote their well-being.

Every member of staff should read this code of conduct in conjunction with Swanbourne House School's Safeguarding Policy and the document Keeping Children Safe in Education produced by the Department for Education

4. Safer Recruitment

Swanbourne House School follows the Government's guidelines for the safer employment of staff who work with children. We obtain enhanced Disclosure and Barring Service (DBS) certificates on all new members of staff; temporary staff; visiting and peripatetic staff and contractors' employees, such as catering staff, who work unsupervised in the school. Governors and parent helpers who have regular unsupervised access to children are also required to have up to date DBS certificates. DBS certificates are also required for the adult members of the families of members of staff who are accommodated on site. More details are set out in the Safeguarding Policy.

New staff and Governors receive child protection training as part of their induction process. This training is repeated at not more than three yearly intervals.

5. Designated Safeguarding Leads

Mrs Jane Thorpe, our Head, together with Mrs Ruth Nicoll (Head of Lower School/Director of Pastoral Care) are Swanbourne House School's Designated Safeguarding Leads (DSL). We have a team of Deputy DSL's spread across the school:

Mr Matthew Phillips, (Assistant Head); Mrs Justine Mitchener (SENDCo); Mrs Simone Mitchell (Deputy Head); Miss Sarah North (Head of EYFS); Miss Helen Grace (School Nurse); Mr Edward Selby-Lowndes (Resident Boarding Tutor).

They have been fully trained for the demands of this role and inter-agency working. They regularly attend courses with other child support agencies to ensure that they remain conversant with best practice. They undergo refresher training every two years, and maintain close links with the Safeguarding Partners for Buckinghamshire. They report at least once a year to the full Board of Governors on child protection issues.

6. Promoting Awareness

Our curriculum, pastoral and house systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All our teaching staff play a vital role in this process, helping to ensure that all of our pupils relate well to one another and feel safe and comfortable within the school. We expect all the teaching, boarding and medical staff to lead by example, and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that our pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy.

Time is allocated in PSHE and form tutor time to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, Drama, PSHE and RE lessons are used to promote tolerance and mutual respect and understanding.

7. Role of Senior Pupils

All senior pupils are given leadership training that includes making sure that the younger pupils are kept safe, and on the appropriate action that they should take if they discover that a pupil is being bullied or abused.

8. Interaction with Pupils: Guidance for Staff

In general, pupils should be encouraged to discuss with their parents or guardians issues that are troubling them. It may be appropriate to suggest that a pupil sees a senior member of staff or an adult with whom they feel secure.

Staff need to ensure that their behaviour does not inadvertently lay themselves open to allegations of abuse or their actions do not place pupils or themselves at risk of harm or of allegation of harm to a pupil. (e.g. 1-1 tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil and so on).

They need to treat all pupils with respect and try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot. Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint. Staff should avoid taking one pupil on his/her own in a car. If you are speaking to a child on your/their own in a room, the door should always be left open

Communication with Pupils - Staff should not give their personal mobile phone numbers to pupils, nor should they communicate with them by text message or personal email. If they need to speak to a pupil by telephone, they should use one of the school's telephones. The Group Leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her.

Physical Restraint - Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on him/herself or on another, and then only as a last resort, when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL/DDSL /Head who will

decide what to do next. Parents should be informed of the circumstances of any physical restraint on the same day or as soon as is practicably possible.

Staff working in the Boarding House should also read guidance in the Boarding Staff Handbook.

9. If a pupil reports abuse

Pupils who have a problem may speak to someone whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. A pupil who is insistent upon confidentiality should be referred to an external source, such as ChildLine (details are given in the Policy for Pupils on Confidentiality Issues, which is displayed in the homework diaries, and on notices in the telephone boxes on the boarding floor and front corridor). If the pupil is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. The adult should provide the DSL with a written account of what has transpired as a matter of urgency.

If a pupil decides to speak to a member of staff about the fact that either he/she, or a pupil known to them, is being bullied, harassed and abused, the member of staff should:

- React professionally, and remember that they cannot carry out an investigation for any allegation of abuse.
- Take what the child says seriously, and calmly, without becoming emotionally involved.
- Make it clear why unconditional confidentiality cannot be offered, (drawing on the policy for pupils on confidentiality issues as necessary).
- Explain that any adult member of staff is required to inform the DSL or one of the DDSLs (details above).
- Explain that only those who have a professional "need to know" will be told, and, if appropriate, measures will be set up to protect the pupil from retaliation and further abuse.
- Reassure the child that he or she was right to tell, and that he/she is not to blame for having being bullied or abused.
- Allow the child to tell his or her own story, without asking detailed or leading questions.
- Record what has been said, interview record is handwritten, signed and dated.
- Inform the DSL, a DDSL or Head as soon as possible - at least by the end of the morning/afternoon session of that day.
- Where there are evident signs of physical injury, that may (or may not) be the result of abuse or bullying, medical help should be summoned, or the pupil should be taken to Sick Bay.

10. Role of School Medical Staff

Health professionals in a school operate within their own professional guidelines, which include an obligation to refer cases of abuse to the DSL, DDSL or Head and to pass on information to the Head as required by Social Services.

11. Whistle Blowing

If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, he or she should report it at once to the Head. If the concern related to the Head then the Senior DSL should be informed and he will refer the matter to the Chairman of Governors. Staff have a duty to notify the authorities where they discover instances of bribery, fraud or other malpractice. Any concern will be thoroughly investigated under the school's whistle-blowing procedures as set out in the Employee Handbook – investigations of allegations regarding Safeguarding would not be undertaken before speaking to the LADO. If there is evidence of criminal activity, the Police will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution.

Appendix 4

Mobile Devices

Please understand this policy statement:

- Staff may use their personal devices for work purposes e.g. retrieving material for lessons.
- Staff may use their personal devices for private business out of sight and away from children, other than in an emergency.
- Personal devices may not be taken into the toilets, nappy changing areas, changing rooms, swimming pool or onto the boarding floors.
- Personal mobile phones belonging to the EYFS staff are not to be used throughout contact time with the children and are put out of sight.
- EYFS Staff are not permitted to use recording equipment on their personal mobile phones to take photos or videos of EYFS children they are to use school recording equipment for all observational records.
- Staff may not use personal devices for taking photographs at school or of school events, nor will they store such images on their own computers or electronic devices at home. (It is understood that staff with children in school may take photographs of their children with their personal devices for use at home).
- Photographs may only be taken with a school device and only for educational or marketing purposes.
- Staff are to be aware of any child who does not have consent for photographs.

To facilitate this policy mobile phones will be provided for each minibus and in the office for trips where minibuses are not required.

Appendix 5

Whistleblowing – extract from Employee Handbook (B4)

1. Whistleblowing Policy. The School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct, and poor or unsafe practice and potential failures in the school's safeguarding regime. The policy also provides if necessary, for such concerns to be raised outside the organisation.

a. Elements of the Policy. In accordance with Lord Nolan's second report of the committee on standards in public life, the School's policy on whistleblowing is intended to demonstrate that the school:

- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the School's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

b. Procedure. This procedure is separate from the School's adopted procedures regarding grievances. Employees should not use the whistleblowing procedure to raise grievances about their personal employment situation. This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School. Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

c. Confidentiality. Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

d. The Investigation. A member of staff will be at liberty to express their concern to the Head or Deputy or the School Bursar. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. Allegations regarding Safeguarding will not be investigated until the LADO has been consulted. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the Resolution. A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Trustees.

e. External Procedures. Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue). It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the employee reasonably believes:

- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the School;
- Where the Secretary of State has ordered it.

f. Malicious Accusations. False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

g. Protection from Reprisal or Victimisation. No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing procedures.

Child protection is always our top priority.

"Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child." [KCSiE Sept 2020]

Appendix 6

Job Description of Designated Safeguarding Lead and Deputies

Main Responsibilities of the Designated Safeguard Leads and Deputies are set out in KCSIE September 2020 Annex B. The Designated Safeguarding Leads and Deputies are expected to:

Manage referrals

- 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;
- Refer cases where a crime may have been committed to the Police as required.

Be responsible for the online safety of the children

Work with others

- Liaise with the Head to inform 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 described in Part 4 of KCSiE) and the designated officer(s) at the local authority for child protection concerns regarding 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.

Undertake training

The Designated Safeguarding Lead 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 that they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of 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 may put in place to protect them.

Raise Awareness

- The Designated Safeguarding Lead should ensure the school's child protection policies are known, understood and used appropriately;
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Board 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 in this;
- Link with the local Safeguarding Partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child protection file

- Where children leave the school 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 hours) for staff in the school to discuss any safeguarding concerns. In exceptional circumstances this discussion could be by phone or email, but face to face discussion is preferred. The DSL will always be contactable on the Safeguarding Mobile 07732 600379. In rare circumstances the mobile will be handed to a DDSL.
- In the DSL's absence from school one of the Deputy DSLs should be aware and make themselves available for staff to raise any safeguarding concerns.