



# King's College

## TAUNTON

### **Child Protection (Safeguarding) Policy and Procedures**

This policy is applicable to all pupils including those in EYFS

*This policy applies to  
King's College Prep School and King's College Taunton*

**Policy Date:** September 2023

#### **Responsibility**

**Individuals:** King's College - Karen McSwiggan, Deputy Head and DSL  
King's College Prep School – Steve Watson, Deputy Head and DSL

**Nominated Child  
Protection Governor:** Mrs Charis Cavaghan-Pack

**Governor Committee:** Full Council

#### **Review Cycle:** (Annual)

**Next scheduled review:** September 2024

**Last interim review:** March 2024

**Our policy applies to all staff (teaching, support and volunteers) and Council Members (governors) working for and on behalf of the School and is available to parents via the website or on request. It adheres to current Somerset Safeguarding Children Partnership guidance. SSCP comprises Somerset County Council, Avon and Somerset Constabulary and Somerset Clinical Commissioning Group.**

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## Part 1 CHILD PROTECTION AT KING'S SCHOOLS, TAUNTON

King's College, Taunton and King's College Prep School, together making up King's Schools, Taunton and hereafter referred to as the School, are committed to safeguarding and promoting the welfare of all pupils at the School. Safeguarding, in addition to Child Protection, includes other issues such as pupil health and safety, bullying/cyberbullying, medical provision and substance misuse. Policies and guidelines on these areas should be read in conjunction with this document. All policies have regard to current legislation and DfE guidance.

In drawing up this policy the School has taken note of:

- statutory guidance Keeping Children Safe in Education (September 2023) (KCSIE);
- statutory guidance Working Together to Safeguard Children (December 2023) (WTSC);
- procedures prescribed by the Local Safeguarding Children Partnership – viz the Somerset Safeguarding Children Partnership;
- The Education (Independent School Standards) Regulations 2014 (ISSR);
- Boarding Schools: National Minimum Standards 2022 (NMS);
- Statutory Framework for the Early Years Foundation Stage (EYFS);
- SEND code of practice: 0-25 years, HM Government 2014;
- Prevent Duty Guidance for England and Wales (March 2015, updated December 2023);
- statutory and non-statutory guidance referred to in any of the above;
- Children Missing Education (September 2016)
- Sexual violence and sexual harassment between children in schools and colleges, DfE (September 2021), now incorporated in KCSIE 2022;
- Relationships Education, Relationships, and Sex Education (RSE) and Health Education (September 2021);
- Keeping children safe in out of school settings (April 2022)
- Behaviour In Schools (July 2022)
- Digital technology standards in schools and colleges (March 2022, updated March 2023)
- regulatory handbooks, guidance and updates issued by the Independent Schools Inspectorate;
- The Charity Commission guidance *Safeguarding and protecting people for charities and trustees (updated June 2022)*
- the BSA Commitment to Care Charter (Appendix 9); and
- notifications and updates from professional advisors

The following School policies and documents form a key part of the School's overall approach to safeguarding:

- The Recruitment, Selection and Disclosure policy (including procedures on staff commencing employment pending a DBS disclosure);
- The Staff Code of Conduct and the Whistleblowing policy, contained in the Staff Handbook;
- The Single Central Register of Appointments;
- The Risk Assessment policy;
- Anti-bullying policy;
- Alcohol policy;
- Drugs and Drug Testing policy;
- Missing pupil policy (including children missing from education);
- Online Safety policy;
- Behaviour policy;
- Eating disorders policy;
- Confidentiality policy;
- Procedures when a member of staff faces allegations of abuse;
- Educational, cultural and recreational trips, tours and visits policy;
- First aid, medical care and intimate care policies;



- Health and safety policy;
- Fire Safety and Prevention policy;
- Pupil supervision policy;
- Visitor policy;
- Schemes of work for PSHE, RSE and IT contained within the School's Curriculum policy and relating to teaching children how to keep safe offline and online.

## Key school contacts

In all cases of actual or suspected abuse our Designated Safeguarding Lead must be informed and the South West Child Protection Procedures followed – these are online procedures, which are regularly updated. Key staff should upload this website to their desktop for instant access - <https://swcpp.trixonline.co.uk/>

The Designated Safeguarding Lead will inform the Head of all cases of actual or suspected abuse. The only exception to this would be if the Head were implicated in the concerns, in which case the Custos (Chairman of governors) would be informed without first notifying the Head.

<p><b>King's College</b></p> <p><b>Designated Safeguarding Lead (DSL) and Designated Teacher for Looked After Children</b>          Karen McSwiggan: Deputy Head, Pastoral          Office: 01823 328212 Mobile: 07989 397436          e-mail: <a href="mailto:klmcswiggan@kings-taunton.co.uk">klmcswiggan@kings-taunton.co.uk</a></p>
<p><b>Deputy Designated Safeguarding Leads (DDSLs)</b>          Jonty Lawford: Deputy Head, Academic          Office: 01823 328219 Mobile: 07989 397426          e-mail: <a href="mailto:jjblawford@kings-taunton.co.uk">jjblawford@kings-taunton.co.uk</a></p> <p>Dafydd Jones : Head of Boarding          Mobile : 07809 735 613          e-mail : <a href="mailto:djones@kings-taunton.co.uk">djones@kings-taunton.co.uk</a></p>
<p><b>Nominated Safeguarding Governor (NSG)</b>          Mrs Charis Cavaghan-Pack          Mobile: 07771 908514          e-mail: <a href="mailto:CCavaghan-Pack@kings-taunton.co.uk">CCavaghan-Pack@kings-taunton.co.uk</a></p>
<p><b>King's College Prep School</b></p> <p><b>Designated Safeguarding Lead (DSL) and Designated Teacher for Looked After Children</b>          Steve Watson: Deputy Head, Pastoral          Office: 01823 285931 Mobile: 07715 035369          e-mail: <a href="mailto:swatson@kingshalltaunton.co.uk">swatson@kingshalltaunton.co.uk</a></p>
<p><b>Deputy Designated Safeguarding Lead (DDSL)</b>          Claire Luckhurst (Head of Pre-Prep)          Office: 01823 285932 Mobile:077150355681          e-mail: <a href="mailto:CLuckhurst@kingshalltaunton.co.uk">CLuckhurst@kingshalltaunton.co.uk</a></p>
<p><b>Nominated Safeguarding Governor (NSG)</b>          Mrs Charis Cavaghan-Pack          Mobile: 07771 908514          e-mail: <a href="mailto:CCavaghan-Pack@kings-taunton.co.uk">CCavaghan-Pack@kings-taunton.co.uk</a></p>



**Key external contacts**

For further SSCP (Somerset Safeguarding Children Partnership) contact details see page 26

**All new enquiries and referrals should be made via Somerset Direct (0300 123 2224)**

Somerset Direct (Somerset Children and Young People's Services Referral Team)	0300 123 2224
Somerset Out of Hours Emergency Duty Team	0300 123 2327
Children's Safeguarding Leads Consultation Line	0300 123 3078
Early Help Advice Hub	01823 355803
Critical Incident Support (EPS SSE)	01823 357000
DBS Confidential checking service	<a href="mailto:customerservices@dbb.gov.uk">customerservices@dbb.gov.uk</a>
DBS referrals helpline	0300 200 190
Beth Olive (Education Safeguarding Lead, Somerset County Council)	07977 401486
Anthony Goble (Local Authority Designated Officer)	07823 537359
Police Safeguarding Coordination Unit	01278 649228
OFSTED Safeguarding Children Email: <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a>	0300 123 4666
Independent Schools Inspectorate Email: <a href="mailto:concerns@isi.net">concerns@isi.net</a>	0207 6000 100
NSPCC Whistleblowing Advice Line Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	0800 0280285
NSPCC Report Abuse In Education Advice Line Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	0800 136663
Domestic Abuse Helpline	0800 6949999
Teaching Regulation Agency Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>	0207 593 5393

**Regional Police Prevent and Channel Team – Avon and Somerset Police**

**To report a concern**

**Police Prevent Team**

**Phone 01278 647466 – Monday to Friday 8am-4pm, or regional team on 01179 455 536**

**Email [PreventSW@avonandsomerset.police.uk](mailto:PreventSW@avonandsomerset.police.uk)**

**For out of hours, email [channelsw@avonandsomerset.pnn.police.uk](mailto:channelsw@avonandsomerset.pnn.police.uk)**

**To get advice, support and for training enquiries**

**Prevent Advice - Somerset County Council**

Public Health Specialist – Community Safety, Lucy Macready

Phone 07887 955 440      Email: [LMacready@somerset.gov.uk](mailto:LMacready@somerset.gov.uk)

### Emergency contacts and Hotlines

For High risk Prevent enquiries / emergencies	Tel: 999
For low risk / non-emergencies	Tel: 101 and ask for the Local Policing Team
The Anti-terrorist Hotline	Tel: 0800 789 321
Department for Education (non-emergency)	Tel: 020 7340 7264
Email: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>	

## Part 2 STATEMENT OF INTENT

### Please read in conjunction with Appendix 2 Threshold Guidance from the SSCP

We believe that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people under the age of 18 years and to keep them safe. We will also ensure that any pupils on roll over the age of 18 will be signposted to and supported to access Adult Services.

All children and young people will have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. We are committed to anti-discriminatory practice and recognise the additional needs of children from minority ethnic groups and disabled children and the barriers they may face, especially around communication.

We recognise that children who suffer any form of abuse may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The School may be the only stable, secure and predictable element in the lives of children at risk. When at school, their behaviour may be challenging, or they may be withdrawn. (See DfE Behaviour and Discipline in Schools July 2022). In such cases, we will liaise with other agencies that support the pupil such as Children's Social Care, Child and Adolescent Mental Health Service, Education Attendance Service and Educational Psychology Service. We will also ensure that, should a pupil in receipt of a child protection plan move school, their information is securely transferred to the new school immediately and that the child's social worker is informed.

The School recognises that safeguarding incidents can happen anywhere, and all staff should be alert to possible concerns being raised. Everyone who comes into contact with children and their families has a role to play in safeguarding children. **Any member of staff may raise concerns directly with Somerset Direct (Children's Social Care) if they are concerned about the safety of a child.**

The School fully recognises its responsibilities for child protection. Whilst we strive to minimise risk, we are fully aware that child protection risk cannot be eliminated.

Our policy applies to all staff (teaching, support and volunteers) and governors working for and on behalf of the School and is available to parents on request. There are seven main elements to our policy:

- Establishing a positive, supportive, secure environment in which children can learn and develop, together with a School ethos, which promotes, in all pupils, a sense of being valued.
- Ensuring we practise safer recruitment in checking the suitability of all staff to work with children.



- Raising awareness of safeguarding issues and equipping children with the skills needed to keep them safe through the content of the curriculum.
- Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting pupils who have been abused in accordance with his/her agreed child protection plan.
- Teaching the children about safeguarding, including areas such as keeping themselves safe and online safety, through the curriculum and PSHE/RSE.
- The School Council will ensure that the School contributes to the implementation of the safeguarding policy and procedures and good cooperation with local agencies. If there has been a substantial allegation against a member of staff, the School will work with the Local Authority Designated Officer (LADO) to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

We recognise that because of the day-to-day contact with children, staff are well placed to observe the outward signs of abuse. The School will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Encourage staff to exercise professional curiosity, understanding that not all children may feel comfortable disclosing abuse, exploitation or neglect, and that children themselves may not realise their experiences are harmful.
- Ensure children know that there are adults in the School whom they can approach if they are worried.
- Include opportunities in the PSHE curriculum for children to develop the skills they need to recognise and keep themselves safe from abuse.

We will follow the procedures set out by Somerset Safeguarding Children Partnership and take account of guidance issued by the Department for Education in order to fulfil the following aims and objectives:

**Aims:**

- To ensure that all staff and governors understand what is meant by child abuse, whether it be physical injury, emotional or sexual abuse, or abuse through neglect, and are able to recognise its possible outward signs.
- To ensure that all possible steps are taken to help any pupil who discloses abuse or is believed to be suffering from abuse.
- To ensure all staff and volunteers use safer working practices in accordance with our code of conduct and SSCP guidance.

**Objectives:**

- To ensure all staff are aware of their responsibilities and understand they are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating. This includes identifying emerging problems and exercising professional curiosity, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.



- To support and help pupils who may have disclosed abuse or who are thought to possibly be subject to abuse.
- To help pupils to gain the necessary information and skills to resist abuse.
- To protect the confidentiality of the pupil, their family and any other people involved wherever possible, notwithstanding the statutory responsibility to share information with appropriate external agencies and to refer matters on to the Designated Safeguarding Leads.
- To ensure that all staff, volunteers and governors have annual training to help them recognise suspected instances of child abuse.
- To ensure that all staff know what procedures to follow when they suspect a case of child abuse has been/is taking place.
- To ensure all staff are aware of the School's procedures for dealing with accusations of abuse made by pupils against members of staff.
- To ensure all staff and governors are familiar with the School's Safeguarding Policy, Part 1 of KCSIE and the additional information in Annex B.
- To ensure that all staff and volunteers are familiar with policies relating to pastoral care and safer working practices.
- To act in accordance with locally agreed inter-agency procedures.
- To ensure that when pupils leave the School any child protection files are copied and sent to their new educational setting (separately from the main pupil file) as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term.

**Responsible Officers:**

The names and contact details of the Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs) and the Nominated Safeguarding Governor are listed on page 4 of this policy.

**Implementation:**

- The Nominated Safeguarding Governor will receive inter-agency training and appropriate safeguarding updates as recommended by Working together to Safeguard Children (December 2023) and SSCP guidelines.
- This policy and its implementation will be evaluated and reviewed annually by the School Council. Any deficiencies or weaknesses in child protection arrangements will be remedied without delay.
- The policy is made available to parents and others on the School's websites and, on request, from the School.
- A safeguarding report is sent to the School Council for review on an annual basis and an online audit of safeguarding procedures is submitted to the local authority.
- All members of staff and volunteers must have an enhanced Disclosure and Barring Service (DBS) check carried out before they commence employment at the Schools. The administration of this is carried out by the HR Manager.
- The DSL and deputy DSL will undertake child protection inter-agency training and single agency training with update training in line with SSCP guidelines.



- The School will ensure safer recruitment practices are always followed in accordance with Part 3 of KCSIE and the current Independent Schools Standards regulations. For details on this please refer to the School's Recruitment, Selection and Disclosure Policy.
- During the interview process for each member of staff, at least one interview will be conducted by a person that has undertaken Safer Recruitment Training or one panel will include such a person.
- The School will ensure that anyone employed as a teacher is not subject to a Prohibition Order issued by the Secretary of State.
- The School will notify Children's Social Care if there is an unexplained absence of more than two days of a pupil who is in receipt of a child protection plan.
- The School will develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- The School will keep written, dated and signed records of child protection concerns about children, even where there is no need to refer the matter immediately.
- The School will notify the DBS (and the detail of referral to TRA where appropriate) **within one month** of leaving the School any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children. For the purposes of this section 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 pupil 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. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Settlement agreements' cannot apply in this connection, or where the individual refuses to cooperate with an investigation. Proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources. The DBS address for referrals is PO Box 3963, Royal Wootton Bassett, SN4 4HH.
- Independent schools are also under a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate and should make reference to this in their policies. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance is published on the Gov.UK website. Where a referral has been made to the DBS, it is not necessary for a referral also to be made to TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.
- The School will ensure all child protection records are regularly reviewed, kept secure and separate from the main pupil file, in locked locations accessible only to specified staff.
- The School will follow robust procedures to deal with allegations made against a member of staff or anyone who has contact with pupils including volunteers, the Head and governors; in the case of an allegation against the Head, the Custos should be informed directly, without informing the Head first. See separate policy (Procedure if a member of staff faces allegations of abuse)
- The School will apply the SSCP multi-agency Escalation Policy if there is any concern about the actions or inactions of social care staff or staff from other agencies.



- The School will report any serious safeguarding incident to the Charity Commission, in line with their policy, *Reporting Serious Incidents – guidance for trustees*.
- In line with the BSA Commitment to Care Charter (Appendix 9), the School will also notify the BSA as soon as it is permissible to do so, of any allegation against a member of staff, whether recent or non-recent, which the school has referred to the Local Authority Designated Officer (LADO) or equivalent, to the police or to Children's Services. The BSA must also be informed of any allegation of child on child abuse.

### Part 3 ROLES AND RESPONSIBILITIES

The School Council should ensure that the School designates an appropriate senior member of staff to take lead responsibility for child protection (Designated Safeguarding Lead, DSL). A written job description will be provided for this role. This person should have the status and authority within the School (a member of senior management) to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. During term time the DSL and/or a deputy will always be available for school staff or other professionals to discuss any safeguarding concerns. Individual arrangements for holiday periods must be in place with a named person available if needed.

#### **The Role of the School Council**

The School Council fully recognises its responsibilities with regard to child protection and the need to safeguard and promote the welfare of children. The School Council receives termly reports on safeguarding matters and reviews the Child Protection (Safeguarding) Policy and Procedures at least annually.

The School Council is aware of its obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and our local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention.

#### **The Role of the Custos**

The Custos will:

- Be responsible for the appointment of the Nominated Safeguarding Governor and will ensure they discharge their duties in line with the Role of the Nominated Safeguarding Governor as set out in Appendix 3.
- Ensure that training for all members of the School Council equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at the school are effective and support the delivery of a robust whole school approach to safeguarding.
- Undertake an annual review of the complaints logs in both King's College and King's College Prep School and discuss any trends or concerns with the relevant DSL.
- Take the lead in any investigation of allegations against the Head.

#### **The Role of the Nominated Safeguarding Governor** (see appendix 3 for full details)

The Nominated Safeguarding Governor will:

- Champion the promotion of well-being, safeguarding and child protection issues at the highest level within the School.
- Ensure that all policies and procedures relating to Child Protection and safeguarding are reviewed and updated at least annually and any deficiencies remedied without delay. Any deficiencies must be brought to the governors' attention.
- Ensure that the governors are alerted to any incident which the Nominated Safeguarding Governor regards as a substantiated safeguarding incident.
- Ensure that an annual report is made to the School Council on child protection matters as required by SSCP.
- Ensure that child protection and safeguarding are discussed at the termly governors' meetings.



- Ensure that all members of the School Council are fully trained in child protection (including online safety), that it is completed as part of their induction and that training is updated in accordance with SSCP guidance.
- Assume responsibility for liaising with the Heads, Governors, Local Authority and/or other partner agencies in the case of allegations against staff.

The Nominated Safeguarding Governor will also meet termly with the DSL in order to discuss recent events and remain fully informed and up to date with any developments or updates in this area.

### **The Role and Responsibilities of the Designated Safeguarding Lead (DSL) and Deputy DSL (DDSL)**

(see Chapter 2 Working Together (December 2023) and Keeping Children Safe in Education (September 2023) and relevant job descriptions for full details)

The role of the Designated Safeguarding Lead (and, in their absence, of the Deputy Safeguarding Lead) is to:

- Recognise how to identify signs of abuse and know which external child protection agency to contact in the event of a child protection matter coming to his/her attention;
- Ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover;
- Refer all cases of suspected abuse to the Local Authority children's social care and:
  - The Local Authority Designated Officer (LADO) for child protection concerns (all cases which concern a staff member);
  - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child);
  - and/or Police (cases where a crime may have been committed);
- Liaise with the Head (and relevant strategic leads to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- Liaise with Somerset Direct/Children's Social Care and other agencies, as appropriate;
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- Ensure that a proper record is kept of any referral and action taken, and that this is kept safely and in confidence, and
- Manage and deliver staff child protection training and review the operation of the Child Protection (Safeguarding) Policy annually (with the appropriate Nominated Safeguarding Governor) to ensure the procedures are working and that it complies with current best practice.

The DSL / DDSL should receive appropriate training updated regularly in line with the SSCP policy in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;



- 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 (Safeguarding) Policy and procedures, especially new and part time staff;
- Ensure all staff are trained in child protection which is updated annually, in line with advice from the SSCP and safeguarding best practice;
- Be alert to the specific needs of children in need, those with special educational needs and young carers;
- Be able to identify children at risk of radicalisation (undertaking training in the SSCP's approach to Prevent duties);
- Be able to understand the SSCP's approach to harmful sexual behaviours
- Be able to keep detailed, accurate, secure written records of concerns and referrals; ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover;
- Obtain access to resources and attend any relevant or refresher training courses;
- Link with the SSCP to make sure staff are aware of resources, attend relevant training opportunities and have access to the latest local policies on safeguarding;
- Where children leave the School ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file;
- Encourage a culture of listening to children and young people 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 of the difficulties children and young people may face in approaching staff with a disclosure.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

### **The Role of Staff**

All staff, volunteers and governors are provided with induction training which is in line with advice from SSCP and which includes:

1. The School's Child Protection (Safeguarding) Policy, including the procedures to deal with child-on-child abuse and school's safeguarding response to children who go missing from education
2. The staff Code of Conduct including the whistleblowing procedure and acceptable use of technologies, guidance on staff/pupil relationships and communications including the use of social media
3. Contact details of the School's Designated Safeguarding Leads and Nominated Safeguarding Governor and information on their roles
4. The behaviour policy including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
5. On-line safety, including the role of filtering and monitoring



6. A copy of Part 1 of KCSIE and the additional information and guidance provided within Annex B of KCSIE.
7. School leaders and staff who work directly with children will also be required to read Annex B of KCSIE and Part five of KCSIE

All staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via face-to-face training.
- Understand key information contained in Part One of KCSIE. The School will ensure staff understanding through use of the relevant Educare training modules and questionnaires.
- Complete child protection refresher training using the online Educare module annually
- Receive training in safeguarding and child protection regularly, in line with advice from the SSCP. Training will include online safety and harmful sexual behaviours (including child-on-child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via Educare training materials, emails and e-bulletins and staff meetings.

All staff and governors at the School receive regular child protection and safeguarding training and updates on child protection and safeguarding procedures, using SSCP material. This includes training to ensure they understand and are aware of what constitutes child abuse.

Training and policies make it clear that anyone can make a referral to Children's Social Care if there is a risk of immediate serious harm to a pupil.

Records of child protection and safeguarding training undertaken by staff will be recorded by the HR Manager, who has also received external training in child protection and safer recruitment procedures.

All members of staff are kept aware of changes to this policy.

All staff should be alert to changes in a pupil's behaviour patterns or any physical injuries which might cause concern.

For EYFS Staff training see Appendix 8.

## Part 4 PROCEDURES FOR DEALING WITH CASES OF ABUSE/SUSPECTED ABUSE

In Somerset the LADO is **Anthony Goble 07823 537359**.

**All new enquiries and referrals should be made via Somerset Direct on 0300 123 2224**

### (a) Cases where abuse may have been inflicted by parents or carers

- (i) Suspicion or knowledge of abuse must be reported to the Designated Safeguarding Lead or their Deputy. All staff must be aware of their responsibilities and understand they are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating. All school and college staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance staff should discuss early help requirements with the designated safeguarding lead or their Deputy who will share such information with the Head and only relevant other staff on a 'need to know' basis. Staff may be required to support other agencies and professionals in an early help assessment.
- (ii) Any adult to whom abuse is reported by a pupil has a duty to listen to the pupil, to provide reassurance, and subsequently to record the pupil's statements. He / she must not press the pupil, ask probing questions or suggest answers. The situation should then be reported and discussed with the Designated Safeguarding Lead in person or by telephone and confirmed in writing within 24 hours. The DSL will consult with the Head and will inform Children's Social Care and/or the LADO as soon as possible (within one working day). The online South West Child Protection Procedures must be referred to at all stages <https://swcpp.trixonline.co.uk/>.
- (iii) Expert medical diagnosis may be required quickly. The Designated Safeguarding Lead, their Deputy or the Head will arrange this following consultation with Children's Social Care.

### (b) Cases where abuse may have been inflicted by staff (including supply staff), volunteers or Council members

Allegations management procedures should be followed if it is alleged that a member of staff (including supply staff), volunteer or Council member has:

- (i) behaved in a way that has or may have harmed a child
- (ii) possibly committed a criminal offence against or related to a child
- (iii) behaved towards a child or children in a way that indicates s/he is unsuitable to work with children
- (iv) behaved or may have behaved in a way that indicates they may not be suitable to work with children ('*transferable risk*'), including behaviour that may have happened outside of school

Allegations that do not meet the above harms test should be dealt with using the School's procedure for handling low level concerns set out below.

If an allegation is made against a member of staff, volunteer or Council member there is an obvious need to act immediately and with **utmost discretion**. The informant should be told that the matter will be referred in confidence to the appropriate people. This must be done, and the written record passed on the same day to the Head or Designated Safeguarding Lead in the event that the Head is away and uncontactable at the time.



The circumstances should be kept **strictly confidential** until the Head has been able to consult with Somerset's Local Authority Designated Officer (LADO) to judge whether or not an allegation or concern indicates possible abuse. It will always be the Somerset LADO even if the pupil's family home is in another county/country because the geographic location of the School is Somerset.

If it is decided, by the Local Authority Designated Officer (LADO), that an investigation is called for, it is the responsibility of the LADO to arrange a meeting (called a Strategy Meeting) to discuss how the next steps are handled. The strategy meeting is initiated by the LADO referring to Somerset Direct. The strategy meeting would normally involve the Police, Children's Social Care, the Designated Safeguarding Lead, the Head and preferably a member of the School Council. The arrangements agreed upon in the strategy meeting will include informing the parents and seeking their consent for any immediate medical examination.

The strategy meeting will decide when the member of staff against whom the allegation has been made, should be informed and no discussion should take place about the allegation without the permission of the LADO or the strategy discussion chair. The staff member against whom the allegation is made would normally be informed as soon as possible after the initial strategy meeting (or as a result of a discussion with the LADO).

If, at the strategy meeting, it is established that the allegation is not criminal but is still of concern it will be agreed what further action, if any, needs to be taken. At the conclusion of the investigation, if criminal proceedings don't ensue, there is a range of possible sanctions available to the School including, where the circumstances warrant it, dismissal. These decisions will be taken by the School in conjunction with the School's legal advisers and human resources advisers. Details of all investigation and outcomes should be carefully recorded and securely stored in staff personnel files.

The strategy meeting will also recommend to the employer whether the member of staff can remain on the School sites or not, pending further investigation. It is the employer's decision alone whether suspension/leave of absence is implemented. If the allegation is against a member of staff, and the Police/Children's Social Care decide to take the case further, it is reasonable to ask the Police to give some indication of their timescales. The LADO can also advise in terms of process.

There is understandable concern amongst many teachers that careers may be irreparably damaged by flimsy or malicious allegations by children. This is actually extremely rare, though some incidents do end up only as "unsubstantiated" one way or the other which is generally unsatisfactory. It is always better for the School to anticipate possible risks and to seek to prevent all reasonable risk of misunderstandings and false allegations. Proper policy and procedures are also likely to deter any individual seeking to use the Schools as a basis for inappropriate relationships with pupils; the School's Staff Code of Conduct will be helpful. This will help staff to know what behaviours are generally considered to be inconsistent with their professional status. Infringements should then be subject to disciplinary procedures as required. All staff should be aware of the DfE – Use of Reasonable Force – July 2013 guidance and the School's own policy in this area.

It is a legal requirement to notify the DfE and DBS within one month if the services of a person are discontinued because he / she was considered unsuitable for work with children and meet the DBS criteria for referral. Independent Schools are also under a duty to consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance is published on the NCTL website.

Where an allegation is made against a member of supply staff provided by an agency, the agency should be fully involved.



There may be occasions when low level concerns or allegations (i.e. they do not meet the harms test) arise about teachers and other staff (including the head, governors, supply staff, volunteers and contractors).

A low-level concern is any concern that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to one basis in a secluded area or behind a closed door, or
- humiliating pupils

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

The School's code of conduct is given to all staff on induction and is reissued annually within the staff handbook. The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this at all times.

Staff must share all low-level concerns with the DSL without delay so that they can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. The DSL will inform the Head of all low-level concerns, and in a timely fashion according to the nature of the concern. If the low-level concern relates to the Head, it should be shared with the Chair of Governors.

If the School is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head (or DSL) will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing by the DSL. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained at least until the individual concerned leaves the School's employment.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the designated officer.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the Head. The concern will be recorded in accordance with the School's low-level concern procedures, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

**(c) Cases where abuse may have been inflicted by the Head**

If an allegation or complaint is made against the Head, the person receiving the allegation should immediately inform the Custos, or in his / her absence the Nominated Safeguarding Governor, **without first notifying the Head.**

**(d) Cases where abuse may have been inflicted by a pupil (child on child abuse, including child on child sexual violence and harassment)**

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways. Such behaviour includes but is not limited to:

- Abuse within intimate partner relationships;
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm);
- violence, including gender based violence;
- threatening or intimidating behaviour;
- blackmail;
- harmful sexual behaviour (including sexual violence and sexual harassment) both online and offline, including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent (such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party);
- upskirting, which 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 to cause the victim humiliation, distress or alarm;



- sexting (also known as youth produced sexual imagery), consensual and non-consensual sharing of nudes and/or semi-nudes,
- any form of inappropriate behaviour by an older pupil towards a younger or more vulnerable pupil;
- Initiation or hazing type violence and rituals;

It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh", or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child-on-child abuse, and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children. The School also recognises that certain children may face additional



barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

The School takes steps to minimise the risk of child-on-child abuse. The School has robust anti-bullying procedures in place (see the School's Anti-bullying Policy) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the SSCP/ SSE and Somerset Direct on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the SSCP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the SSCP and/ or the police as appropriate. The School will have regard to the procedures set out in *KCSIE* at all times. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL (or DDSL) who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL (or DDSL) will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the SSCP referral process.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.



In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by pastoral staff at the school and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), boarding and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or

may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it.

**(e) Complaint or Allegation?**

It is important to draw a distinction between complaints and allegations. Complaints are made about a process; allegations are made about behaviour. In our setting concerns relating to behaviour of an adult towards a pupil are therefore categorised as allegations.

Any allegation which involves the possibility of physical, emotional or sexual abuse will always be discussed with the Local Authority Designated Officer (LADO) and their advice taken. If the matter is a child protection concern, an investigation will be carried out by Children's Social Care and the Police, as happens with any other referral. The Designated Safeguarding Lead, the Head and governors must not carry out investigations themselves in these circumstances. They will be invited to a Strategy Meeting at a very early stage. Decisions about suspension and the use of disciplinary procedures are for the Head and governors alone, but action may need to be coordinated where there is a wider investigation involving Children's Social Care and/or the Police and where for example, bail conditions may apply.

**This policy should be implemented regardless of whether the complainant is over or under 16 because of the potential for an abuse of trust.** Parents should be informed as soon as possible that a referral to Children's Social Care will be made by the Designated Safeguarding Lead, **unless to do so would put the pupil at greater risk of harm.** If there is any doubt, the Designated Safeguarding Lead will consult with the Police / Children's Social Care beforehand.

**Part 5 PROCEDURE FOR REPORTING CONCERNS**

Staff could have their suspicion or concern raised in a number of ways, the most likely of which are:

- the conduct of a member of staff;
- a child, parent or member of staff "disclosing" abuse;
- bruising or evidence of physical hurt; which may or may not be accompanied by;
- unusual behaviour by a child.

If a member of staff has such concerns they should be reported to the Designated Safeguarding Lead immediately (in person or by telephone) and confirmed in writing within 24 hours. **Delay could prejudice the welfare of a child.** If the concerns relate to the conduct of a member of staff these also should be reported directly to the Designated Safeguarding Lead and Head; there is an obvious need to act immediately and with **utmost discretion.**

The Designated Safeguarding Lead will report concerns as soon as possible and certainly within one working day to Children's Social Care (or the LADO if the concerns are about a member of staff or volunteer); this may include discussing the circumstances on a confidential basis with Children's Social Care or the Police.

In cases where it is felt the child requires assistance from other agencies that support pupils such as Children's Social Care, Child and Adolescent Mental Health Service, Education Welfare Service and Educational Psychology Service, we will liaise with them as appropriate. We also have access to our school counsellor.

**A distinction should be made between safeguarding children who have suffered or are at risk of suffering serious harm and those who are in need of support from one or more of the agencies named above. The former should be reported to Children's Social Care and /or the**

**Police immediately; the latter should lead to inter-agency assessment using local procedures.**

#### **Part 6 WHAT TO DO IF A CHILD DISCLOSES**

The following information is intended to assist you if you become involved in a potential child protection situation when a child or young person makes a disclosure.

***Note that this is a completely different procedure to interviewing pupils on disciplinary issues.***

➤ **ALLOW THE CHILD TO TALK / FINISH STORY**

Listen, allow the pupil to finish without directly questioning or stopping them. Let them tell you what they want to and no more. They may need to disclose to a specialist later and too much detail now may interfere with later investigation.

➤ **STAY CALM**

Try not to transmit your anger, shock, distress, or embarrassment to the child - either verbally or through body language.

➤ **REASSURE THE CHILD**

When the pupil has finished, reassure the child or young person that you are taking what they have to say seriously and make sure they feel secure (not your fault; glad they told you etc). Explain to the child that you will need to talk to someone in another agency whose job it is to help and protect children and that they will want to talk to the child **but offer to stay with the child and support them.**

➤ **RECORD**

Write down notes, including date and time of the interview and sign the notes. Record as much as you can remember, as soon as possible (preferably immediately) afterwards, using the pupil's own words.

**REPORT THE INCIDENT IMMEDIATELY TO THE DESIGNATED SAFEGUARDING LEAD, or in their absence, the Deputy Safeguarding Lead or Head, passing on the notes you have made. Please use the Cause for Concern Reporting Form (Appendix 4) at King's College Prep or MyConcern at King's College.**

The DSL will report concerns immediately (within one working day) to Children's Social Care (or the LADO if the concerns are about a member of staff or volunteer) this may include discussing the circumstances on a confidential basis with the authorities.

#### **CONFIDENTIALITY**

The Children Act (1989) (Appendix 1), the 2004 (updating) Children Act and Keeping Children Safe in Education (September 2021) confirm that the "welfare of the child is paramount". This means that considerations of confidentiality which might apply to other situations should not be allowed to override the right of children to be protected from harm. However, every effort should be made to ensure that confidentiality is maintained for all concerned when an allegation has been made and is being investigated. (see DfE Guidance "Dealing with Allegations of Abuse against Teachers and other Staff – Oct 2012)

Staff should never give pupils or adults an absolute guarantee of confidentiality but must ensure that the information is disclosed only to the people who need to know. Make sure that this is clear early on, not sprung on the pupil at the end. It should be explained to children and young people that secrets cannot and should not be kept if keeping them means that they, or others, will continue to be harmed.



The School offers a counselling service to pupils. This is a confidential service but the counsellor is subject to the same obligations about confidentiality and child protection as all other staff.

## Part 7 SPECIFIC SAFEGUARDING ISSUES

Statutory guidance acknowledges the following as specific safeguarding issues:

- bullying including cyberbullying, prejudice-based and discriminatory bullying
- child on child abuse
- child criminal exploitation (CCE)
- child sexual exploitation (CSE)
- children in the court system
- children with family members in prison
- children missing education (CME), including persistent absence
- children missing from home or care
- child abduction and community safety incidents
- county lines
- cybercrime
- domestic abuse (including within peer intimate relationships)
- homelessness
- drugs and substance abuse
- fabricated or induced illness (FII)
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender- and transgender- based violence / violence against women and girls (VAWG)
- so called 'honour based' abuse (HBA); or 'honour based' violence (HBV)
- hate
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation may also include an online element)
- mental health
- missing children and adults strategy
- modern slavery and the national referral mechanism
- online safety
- private fostering
- preventing radicalisation
- the Prevent Duty
- Channel
- relationship abuse
- serious youth violence
- sexual violence, such as rape, assault by penetration and sexual assault; this may include an online element which facilitates, threatens and/or encourages sexual violence
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- sexting (also known as youth produced sexual imagery) – consensual or non-consensual sharing of nude and semi-nude images and/or videos
- trafficking and modern-day slavery
- substance misuse
- upskirting
- young carers



Further advice and links to guidance on these specific safeguarding issues can be found in Annex B of KCSIE 2022, the NSPCC website – types of abuse ( <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/> ). Localised resources for education settings can also be found on the SSCP website at <https://somersetsafeguardingchildren.org.uk/link/>

### **Specific actions to take on topical safeguarding issues as recommended by Somerset Education Support Services**

General or national guidance will not be included here. A summary of specific duties are in Keeping Children Safe in Education 2022 Annex B :

[https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping\\_children\\_safe\\_in\\_education\\_2023.pdf](https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2023.pdf)

In recognition that the threshold of child protection is 'likely to suffer' significant harm, the School may need to make a referral to children's social care. Where possible, this will involve notifying the parent/carer if it does not place the child or young person at further risk of harm.

It is also important to recognise the importance of liaising with other education settings which may have siblings attending. It is likely that they may hold additional information which will support early identification of harm and in turn develop our assessment of need.

### **Child Exploitation – both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

The School will ensure that early help intervention is provided as soon as a concern of exploitation is identified. Discussion and advice will be sought from targeted services to consider what support may be available. The child and their family will be part of any planning and interventions.

- If the child is at risk of CSE or there is intelligence which indicates that the learner or peer group are at risk of CSE, the School will share information with Operation Topaz (the police). This information will support proactive activity to disrupt criminal activity in relation to sexual exploitation.
- If the child is at risk of CCE, information should be shared with Somerset's Violence Reduction Unit - The VRU can advise and support settings to manage risk. Targeted support maybe available to disrupt learners from getting involved with criminality.
- Agencies will share 'Missing persons' notifications (where a child is reported missing from home or care) with education settings with a view to support them to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes. These should be stored securely on the child's Safeguarding/Child Protection file.

### **Domestic Abuse**

Operation Encompass is a national operation where local police forces notify when the police are called to an incident to domestic abuse. Avon and Somerset have their own version of this and will notify education settings through the Education Safeguarding Service whenever they have responded to a domestic abuse incident. This will enable the education setting to take proactive action and reasonable adjustments in relation to behaviour management. When a setting is concerned about the amount of police notifications they receive or disclosures of domestic abuse they should consider seeking further advice and completing an Early Help Assessment or DASH to support the family.



## Female Genital Mutilation

**Mandatory reporting duty:** [Click here for government guidance](#)

This is a legal duty for all professionals undertaking teaching work to report known cases of FGM to the police via 101. This is when they:

1. are informed by a girl under 18 that an act of FGM has been carried out on her; or
2. observe physical signs which appear to show that an act of FGM has been carried out.

These cases must be referred to the DSL who will support the member of staff to carry out their duty. It is also advised that any referrals made to the police under the mandatory reporting duty are followed up with children's social care, so an assessment of need and support is concurrently considered.

## Online Safety

- Keeping Children Safe in Education highlights additional actions schools should take to keep learners safe online.
- For concerns around individual cases where a child has been harmed through online mediums, advice and guidance can be made through the **Professional Online Safeguarding Helpline**, T: 0344 381 4772, E: [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Where there have been established cases of online abuse or grooming, the school settings should alert - **Child Exploitation and Online Protection command (CEOPS)** <https://www.ceop.police.uk/ceop-reporting/>

## Serious Youth Violence

To be read in conjunction with the above section around Child Criminal Exploitation. There has been local guidance issued on the issue of '[Offensive Weapons in Education Settings](#)'.

It is important to note that should a weapon be used or there is threat of use, the police should be called immediately.

- The same day a weapon is found the school should call for a multi-disciplinary assessment of risk.
- Whilst it is acknowledged that the decision to exclude remains with the Headmaster it is recommended that there is consultation with other agencies to ensure there are no further risks
- Alternatives to exclusions should be considered in recognition that a child may be at further risk of harm out in the community.

## Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child:

- under the age of 16 years (under 18, if disabled)
- by someone other than a parent or close relative (\*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)
- with the intention that it should last for 28 days or more.



Cases of private fostering arrangements must be reported to children's social care to ensure that needs are adequately made.

Statutory guidance states that this should be done at least 6 weeks before the arrangement is due to start or as soon as you are made aware of the arrangements. Not to do so is a criminal offence.

Further support and reasonable adjustments should be made by the education setting to promote achievement of positive educational outcomes.

### Young Carers

A young carer is a person under 18 who regularly provides emotional and/or practical support and assistance for a family member who is disabled, physically or mentally unwell or who misuses substances.

## Part 8 RECOGNISING CHILD ABUSE

### Introduction

All members of the School staff should be alert to the possible signs of abuse of a pupil. Abuse is a form of maltreatment of a child and can be inflicted by an adult or child (peer on peer abuse). Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Abuse may take several forms, which are not mutually exclusive:

#### 1. Physical abuse

Physical abuse 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.

Common sites for non-accidental injury are:

- back, back of legs, buttocks (except occasionally along the bony protuberances of the spine)
- mouth, cheeks, behind the ear
- stomach, chest
- under the arm
- genital, rectal area
- neck

The following should also cause suspicion:

**Bruising** which is more than natural for the age and mobility of the child, particularly on the face or upper arm. Groups of bruises which form a pattern or sequence (sometimes a hand mark). Bruising of different ages.

**Black eyes** especially if there is no bruising to the forehead or nose and the lids are swollen and tender.

Injuries to the **mouth or face**, including the lips or tearing of the web of skin joining the upper lip and gum.

**Fractures and dislocations** which may show in an obvious deformation of a bone or joint or swelling, or a reluctance to move a limb, accompanied by obvious discomfort or pain.



**Fingertip bruises and grasp marks.** Thumb and finger marks around a limb, on opposite cheeks or on chest and back indicate tight grasping, possibly from swinging, force feeding or shaking respectively.

If a child has been **severely shaken**, which is a common form of child abuse, he/she may have internal or brain injuries. Symptoms of this may include cold, clammy skin, drowsiness and vomiting.

**Impression** or outline bruising or weals and scratches resulting from beating with an instrument or hand

**Bite marks.** These may leave clear impressions of individual teeth or sometimes a more general crescent shaped mark changing into a bruise. If the bite is more than 3cm across it must have been caused by an adult or older child with permanent teeth.

**Burns and scalds.** To distinguish between accidental and non-accidental burns and scalds can be very difficult but, as a general rule, suspicions are raised by:

- clear outlines (eg glove and sock effect)
- uniform depth over a large area
- splash marks above the main scald area (caused by hot liquid being thrown)

Remember also:

- a responsible adult checks the water temperature before the young child gets in
- a child is unlikely to get completely into a bath that is too hot
- a child getting into hot water will struggle to get out and there will be splash marks
- small round burns may be caused by cigarettes (but friction burns may be accidental if along the bony protuberances of the spine). Cigarette burns also tend to have a characteristically dark thick base and may be at different stages of healing.

**Scars** – all children have scars, but concern is caused by:

- large numbers of scars, particularly of different ages, and if accompanied by recent bruising
- unusual shaped scars; old cigarette burns; burns that did not receive treatment; brands and tattoos.

## 2. Emotional abuse

Emotional abuse is harder to detect and may result from conveying to a child that they are worthless or unloved, inadequate, or valued insofar as they meet the needs of another person. It may also result from teasing or humiliation, or from the denial of love and affection, interests or friendships. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

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 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 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.

Children who have been emotionally abused are likely to show some or all of these personality characteristics:

- lack of trust
- low self-esteem and self-confidence
- feeling guilty and unworthy as a consequence of constant denigration



- unable to “give” in a relationship because of their need to receive affection and attention
- global or specific development delay
- attempts at self-harm
- gross attention seeking behaviour

Identifying emotional abuse is difficult. Evaluations by child psychiatrists, psychologists, or paediatricians are important.

### **3. Sexual abuse**

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.

It has become clear in recent years that child sexual abuse is more common than was previously assumed. Wider public discussion has prompted many adults to talk about sexually abusive experiences within their childhood. However, there is still an absence of reliable and objective information on its incidence and prevalence.

The Cleveland Report (1988) states: “Sexual abuse occurs in children of all ages including the very young, to boys as well as girls, in all classes of society and frequently within the privacy of the family.”

Medical staff should be alert to bruises, bites, unusual marks or soreness in the genital area, repeated urinary infection or vaginal discharge and all staff should be alert to preoccupation with sexual matters.

A child’s behaviour, and particularly changes in behaviour, may raise suspicion that sexual abuse is taking place. Each of these symptoms may, of course, have other causes. In themselves they are only indicators. Children may display precocious or non-age appropriate behaviour.

Listen to the child. Sometimes a child may purposefully inform an adult about abuse. Alternatively, an adult may realise from what the child has said that abuse is taking place, without any intent on the child’s part to disclose.

### **4. Neglect**

Neglect 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. Neglect and failure to thrive need a medical diagnosis.



Warning signs, in addition to the child's neglected appearance, may include:

- short stature and underweight for chronological age
- red/purple, cold hands and feet at any time of the year
- swollen limbs with pitted sores that are slow to heal
- poor skin condition, especially a severe or persistent nappy rash in an infant
- voracious appetite
- dry, sparse hair
- developmental delay
- unresponsiveness or frozen watchfulness
- indiscriminate relationships with adults, often seeking attention for affection from anyone, but passively accepting when it is withdrawn

## **PARTICULAR CONSIDERATIONS**

### **Contextual or Extra- familial Safeguarding**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

### **Early Help**

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

- is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal 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
- Has a family member in prison, or is affected by parental offending



- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is persistently absent from education, including persistent absences for part of the school day

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the SSCP referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

### **Family characteristics which increase the risk of child abuse**

As part of their safeguarding/child protection training, all staff are made aware that child abuse can happen in any family, regardless of socio-economic background.

SSCP training materials also highlight that child abuse can be more likely to occur in families with certain characteristics. Identification of these families may help in preventative work. These characteristics may add to the suspicion of abuse but do not prove it. They are simply indicative.

#### Parents:

- young, without settled lifestyle, socially isolated, with poor interpersonal skills
- experienced aggression, abuse, disruption or rejection in own childhood
- under stress (financial, forced marriage, overcrowding, poor living conditions)
- personality is immature, highly emotional, aggressive or known to depend on drink or drugs
- limited intelligence
- history of mental ill health
- poor manager of money and other aspects of life
- feel rejected by a child who may be more intelligent
- one carer is not the biological parent
- households where there is domestic violence

#### Child:

- unwanted pregnancy
- separated from mother immediately after birth (eg in neo natal unit)
- pre-term or low birth weight
- disabled or developmentally delayed
- management problem, eg feeding, sleeping, toileting
- excessive difficult behaviour

#### Parent's attitude to child:

- parent's behaviour is exceptional in their excessive, or lack of concern, interest, affection or control of the child
- have unrealistic expectations of their child's physical, mental or emotional capacity, related to age and stage of development
- rejection of the child (eg scapegoat for family problems).



There will be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of pupils, for example children who run away or go missing. Questions of the young person being in moral danger, being uncared for, engaging in antisocial or inappropriate behaviour and so on may be referred to the DSL, who will discuss the matter with the Head, and through them, as necessary, to Children's Social Care. Such cases may also be referred to the Health Centre, and through them to Children's Social Care. In each case the School's DSL must be informed. (See Appendix 4).

### **Boarding Pupils**

Boarding staff should be aware that children in residential settings can be particularly vulnerable and the School should be alert to pupil relationships and the potential for child on child abuse. If a member of staff observes anything of concern they should alert the relevant Houseparent who will inform the DSL.

**A child going missing from home or school** is a potential indicator of abuse or neglect. All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting a pupil missing from school. Please see the School's separate Missing Pupil Policy for further details.

**A child going missing from education** is a potential indicator of abuse or neglect. Staff should follow the School's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. Please see Appendix 6 for further details on the processes that the School must follow.

### **Serious Crimes**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

### **Special Educational Needs and Disabilities**

The School recognises that children and young people with special educational needs and disabilities can be particularly vulnerable to abuse. Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability and this can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

- pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and
- there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

### **Mental Health**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

## Part 9 PREVENTING RADICALISATION

The Counter Terrorism and Security Act (July 2015), places a duty on all schools to have due regard to the need to prevent people from being drawn into terrorism (“the Prevent duty”). Protecting children from the risk of radicalisation is part of a school’s 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, all staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. Professional judgement should be used in identifying children and young people who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme. School staff should be aware of and able to recognise engagement, intent and capability factors which indicate that a person may be vulnerable to being drawn into terrorism. Further guidance can be found here: <https://www.elearning.prevent.homeoffice.gov.uk>

Concerns about a pupil thought to be at risk of radicalisation or of being drawn into terrorism must be referred in accordance with the School’s child protection and safeguarding procedures: staff must report concerns immediately to the DSL or Deputy DSL. Advice will be sought from external agencies and a referral will be made where deemed necessary to the Channel programme. Additionally, staff can also contact the local police or dial 101. The police can talk in confidence about concerns and help to access support and advice. The DfE has also dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

The statutory Prevent guidance summarises the requirements of School 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 might be at risk of radicalisation and what to do to support them.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies should ensure that safeguarding arrangements take into account the policies and procedures of Local Safeguarding Children Partnerships (LSCPs).
- 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 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. Suitable filtering should be in place. It is also important that schools teach pupils about online safety more generally.

The DfE 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.

## Multi Agency Contacts for Safeguarding in Education

### If you have concerns about a child/young person in Somerset

If a child is at immediate risk call the POLICE **POLICE 999**

To make an URGENT referral, i.e., a child is likely to suffer or is suffering significant harm, call Somerset Direct. **Somerset Direct 0300 122 2224**

To make a NON-URGENT referral, complete an Early Help Assessment and send to **SD inputters**

To raise concerns and ask for advice about radicalisation (also contact Somerset Direct). **PREVENT DUTY - 01278 647466**  
[PreventSW@avonandsomerset.police.uk](mailto:PreventSW@avonandsomerset.police.uk)

To liaise with the specialist Safeguarding Police unit **Lighthouse Safeguarding Unit – Avon and Somerset police 01278 649228**

**DSL Consultation Line**  
0300 123 3078

**Early Help Hub**  
01823 3555803

**Critical Incident Support**  
EPS SSE 01823 357000

### If you have concerns about a professional working with a child...

To raise concerns and ask for guidance in relation to the conduct of someone who works with children **Local Authority Designated Officer - (LADO)**  
**Anthony Goble 07823 537 359**  
**Stacey Davis**

### For information, advice, and guidance in relation to safeguarding policy and procedures.

Education Safeguarding Service [ESS@somerset.gov.uk](mailto:ESS@somerset.gov.uk)

**Service Manager**  
**Toby Jenkins**

**Team Manager East**  
**Jane Weatherill**

**Team Manager West**  
**Jane Weatherill**



Child sexual exploitation & child criminal exploitation	<b>Operation Topaz (Avon and Somerset Police)</b> <a href="https://www.avonandsomerset.police.uk/forms/vul">https://www.avonandsomerset.police.uk/forms/vul</a>
Child Missing from Education	<a href="#">Somerset County Council</a>
Children affected by Forced Marriage	<b>Forced Marriage Unit</b> T: (0) 20 7008 0151 E: <a href="mailto:fmufco.gov.uk">fmufco.gov.uk</a>
Online Safety Advice	<b>Professional Online Safeguarding Helpline</b> T: 0344 381 4772 E: <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a>
Reporting online sexual abuse and grooming	<b>Child Exploitation and Online Protection command</b> <a href="https://www.ceop.police.uk/ceop-reporting/">https://www.ceop.police.uk/ceop-reporting/</a>
FGM advice	<b>NSPCC FGM Helpline</b> <b>T: 0800 028 3550</b> E: <a href="mailto:fgmhelp@nspcc.org.uk">fgmhelp@nspcc.org.uk</a>
Domestic Abuse Helpline	<b>0800 6949999</b>
Young Carers – advice and support.	0300 123 2224 <a href="mailto:YoungCarersmailbox@somerset.gov.uk">YoungCarersmailbox@somerset.gov.uk</a>
Whistleblowing professional policy	<b>NSPCC Whistleblowing hotline</b> <b>T: 0800 028 0285</b> E: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Primary Mental Health Specialists (advice) Child and Adolescent Mental Health</b>	
	<a href="mailto:Cyp@somerset.org">Cyp@somerset.org</a>
Advice around harmful sexualised behaviour.	DSL consultation line 0300 123 3078 <b>Brook Traffic Light Tool</b> <a href="https://legacy.brook.org.uk/brook_tools/traffic/index.html?syn_partner=">https://legacy.brook.org.uk/brook_tools/traffic/index.html?syn_partner=</a>

Somerset Safeguarding Children Partnership  
PP2 BW3  
County Hall  
Taunton  
TA1 4DY



## TERMINOLOGY

*Safeguarding* and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of 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.

*Child Protection* refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

*Staff* refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

*Child* includes everyone under the age of 18 Years old. Those over 18 but on a roll of an education setting will be referred to Adult services for support.

*Parent* refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

## ACRONYMS

BSA	Boarding Schools Association
CCE	Child Criminal Exploitation
CME	Children Missing Education
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service
DfE	Department for Education
DSL / DDSL	Designated Safeguarding Lead / Deputy Designated Safeguarding Lead
FGM	Female Genital Mutilation
FII	Fabricated or Induced Illness
HBV	Honour Based Violence
HR	Human Resources
KCSIE	Keeping Children Safe in Education
EYFS	Early Years Foundation Stage
LADO	Local Authority Designated Officer
LSCP	Local Safeguarding Children Partnership
NMS	National Minimum Standards (Boarding Schools)
NSG	Nominated Safeguarding Governor
NSPCC	National Society for the Prevention of Cruelty to Children
OFSTED	Office for Standards in Education
PSHE	Personal, Social, Health and Economic education
SSCP	Somerset Safeguarding Children Partnership
SSCPP	South West Child Protection Procedures
TRA	Teaching Regulation Agency
VAWG	Violence Against Women and Girls
WT / WTSC	Working Together / Working Together to Safeguard Children

## Appendix 1 - The Children Act 1989

The purpose of the Act is to protect the welfare of children.

Various obligations are laid upon schools (and other institutions) and their staff, which are summarised here. Schools will be regularly inspected by the newly formed inspection authority. It is essential that all members of staff are familiar with key features of what the legislation requires, and their responsibilities.

These are set out below:

- (i) The School is required to provide pupils, staff, and parents with written statements of the following:
- the principles on which School life is based;
  - the School's sensitivity to the religious, cultural, racial and linguistic background and beliefs of children;
  - the procedures whereby pupils may raise matters of concern to them;
  - how an approach may be made by a pupil to the Children's Social Care Department.

The Staff Handbook, and other information to parents variously meet these requirements.

**All** members of staff (academic or boarding staff, personal tutors or the Chaplain, the School Doctor or the School Health Centre Staff) are available for counsel and advice. Pupils should approach whichever adult they feel they can talk to.

It is the School's duty to publish the telephone number of the local Children's Social Care department (Somerset Direct – **0300 123 2224**). If there is no one in the School they can turn to in a situation of extreme seriousness, they have the legal right to contact this number.

- (ii) Please note that at **all** levels of staff seniority we could be legally culpable if we fail to ensure that Children's Social Care and the Police are not informed of a clear allegation of sexual or serious physical abuse.

We have an obligation to make sure that there is an adult or adults to whom pupils can turn when they have a serious problem, and that the pupils understand this, and know to whom they may go.

- (iii) The Head, Director of Finance and Staff, and particularly Boarding Staff, have a responsibility to keep under review various aspects of school life, including the following:
- the environmental health of boarders, including such matters as hygiene and provision for privacy;
  - compliance with all Safeguarding National Standards for Boarding Schools
  - pupils' access to telephones;
  - the keeping of records, any complaints (e.g. from parents) about the welfare of a child, and the action taken; details of serious punishments administered (e.g. formal warning, suspension, expulsion); all non-routine letters to parents;
  - records of fire drills and practices;
  - prevention of the exploitation of one pupil by another (e.g. bullying)
  - King's College – Karen McSwiggan & King's College Prep School – Steve Watson are the DSLs whose appointment the law requires as our contact with the Children's Social Care Department.

Appendix 2 - Threshold Guidance

# Threshold guidance



## 4: Vulnerable Child with Acute or Highly Complex Needs

### Developmental needs of infant/child/young person

#### Health

- Has severe / chronic health problems
- Persistent substance misuse, smoking
- Developmental milestones unlikely to be met
- Early teenage pregnancy
- Serious mental health issues
- Dental decay and no access to treatment
- Sexual exploitation / abuse

#### Education and Learning

- Is out of school
- Permanently excluded from school or at risk of permanent exclusion
- Has no access to leisure activities

#### Emotional and Behavioural Development

- Regularly involved in anti-social / criminal activities
- Puts self or others in danger – missing
- Suffers from periods of depression
- Self-harming or suicide attempts

#### Identity

- Experiences persistent discrimination, eg on the basis of ethnicity, sexual orientation or disability
- Is socially isolated and lacks appropriate role models
- Alienates self from others

#### Family and Social Relationships

- Periods of being accommodated by Local Authority
- Family breakdown related in some way to child's behavioural difficulties
- Subject to physical, emotional or sexual abuse / neglect
- Is main carer for family member

### Social Presentation

- Poor and inappropriate self-presentation

### Self-care Skills

- Neglects to use self-care skills due to alternative priorities, eg substance misuse

### Parent and Carer Factors

#### Basic Care

- Parents unable to provide "good enough" parenting that is adequate and safe
- Parents' mental health problems or substance misuse significantly affect care of child
- Parents unable to care for previous children

#### Ensuring Safety

- There is an instability and violence in the home continually
- Parents are involved in crime
- Parents unable to keep child safe
- Victim of crime

#### Emotional Warmth

- Parents inconsistent, highly critical or apathetic towards child

#### Stimulation

- No constructive leisure time or guided play

#### Guidance and Boundaries

- No effective boundaries set by parents
- Regularly behaves in an anti-social way in the neighbourhood

#### Stability

- Beyond parental control
- Has no-one to care for him/her

### Family and Environment Factors

#### Family History and Functioning

- Significant parental discord and persistent domestic violence
- Poor relationships between siblings

#### Wider Family

- No effective support from extended family
- Destructive/ unhelpful involvement from extended family

#### Housing

- Physical accommodation places child in danger

#### Employment

- Chronic unemployment that has severely affected parents' own identities
- Family unable to gain employment due to significant lack of basic skills or long-term difficulties e.g. substance misuse

#### Income

- Extreme poverty / debt impacting on ability to care for child

#### Family's Social Integration

- Family chronically socially excluded
- No supportive network

#### Community Resources

- Poor quality services with long-term difficulties with accessing target populations

## 3: Vulnerable Child with Multiple and Complex Needs

### Developmental needs of infant/child/young person

#### Health

- Concerns re: diet, hygiene, clothing
- Has some chronic health problems
- Missed routine and non-routine health appointments
- Overweight/ underweight/ enuresis
- Smokes, substance misuse
- Developmental milestones are unlikely to be met
- Some concerns around mental health

#### Education and Learning

- Identified learning needs and may have Statement of Special Ed. Needs Not achieving key stage benchmarks
- Poor school attendance/ punctuality
- Some fixed term exclusions
- No interests/ skills displayed

#### Emotional and Behavioural Development

- Difficulty coping with anger, frustration and upset
- Disruptive/ challenging behaviour
- Cannot manage change
- Unable to demonstrate empathy

#### Identity

- Subject to discrimination – racial, sexual or due to disabilities Demonstrates significantly low self-esteem in a range of situations

#### Family and Social Relationships

- Has lack of positive role models
- Misses school or leisure activities
- Peers also involved in challenging behaviour
- Involved in conflicts with peers / siblings
- Regularly needed to care for another family member

### Social Presentation

- Is provocative in behaviour / appearance
- Clothing is regularly unwashed
- Hygiene problems

### Self-care Skills

- Poor self-care for age – hygiene
- Precociously able to care for self

### Parent and Carer Factors

#### Basic Care

- Difficult to engage parents with services
- Parent is struggling to provide adequate care
- Previously a LAC child
- Professionals have serious concerns

#### Ensuring Safety

- Perceived to be a problem by parent
- May be subject to neglect
- Experiencing unsafe situations

#### Emotional Warmth

- Receives erratic/inconsistent care
- Care is often poor quality
- Parental instability affects capacity to nurture
- Has no other positive relationships

#### Stimulation

- Not receiving positive stimulation – lack of new experiences or activities

#### Guidance and Boundaries

- Erratic/ inadequate guidance provided
- Parent not a good role model by behaving in an antisocial way

#### Stability

- Has multiple carers
- Has been a LAC child

### Family and Environment Factors

#### Family History and Functioning

- Incidents of domestic violence between parents
- Acrimonious divorce/ separation
- Family have serious physical and mental health difficulties

#### Wider Family

- Family has poor relationship with extended family/ little communication
- Family is socially isolated

#### Housing

- Poor state of repair, temporary or overcrowded

#### Employment

- Parents stressed due to "overworking" or unemployment
- Parents find it difficult to obtain employment due to poor basic skills

#### Income

- Serious debts/ poverty impact on ability to have basic needs met

#### Family's Social Integration

- Parents socially excluded
- Lack of a support network

#### Community Resources

- Poor quality universal resources and access problems to these and targeted services





**2: Vulnerable Child with Some Additional Needs**

**Development needs of child/ young person**

**Health**

- Defaulting on immunisations/checks
- Is susceptible to minor health problems
- Slow in reaching developmental milestones
- Minor concerns re diet/ hygiene/clothing
- Starting to default on health appointments

**Education and Learning**

- Have some identified learning needs that place him/her on "School Action" or "School Action Plus" of the Code of Practice
- Poor punctuality
- Pattern of regular school absences
- Not always engaged in learning, e.g. poor concentration, low motivation and interest
- Not thought to be reaching educational potential
- Reduced access to books/ toys

**Emotional and Behavioural Development**

- Some difficulties with peer group relationships and with some adults Some evidence of inappropriate responses and actions
- Can find managing change difficult
- Starting to show difficulties expressing empathy

**Identity**

- Some insecurities around identity expressed, e.g. low self-esteem for learning
- May experience bullying around 'difference'

**Family and Social Relationships**

- Some support from family and friends
- Has some difficulties sustaining relationships

**Social Presentation**

- Can be over-friendly or withdrawn with strangers
- Can be provocative in appearance and behaviour
- Personal hygiene starting to be a problem

**Self-care Skills**

- Not always adequate self-care – poor hygiene
- Slow to develop age appropriate self-care skills

**Parent and Carer Factors**

**Basic Care**

- Parental engagement with services is poor
- Parent requires advice on parenting issues
- Professionals are beginning to have some concerns around child's physical needs being met

**Ensuring Safety**

- Some exposure to dangerous situations in home/community Parental stresses starting to affect ability to ensure child's safety

**Emotional Warmth**

- Inconsistent responses to child by parents
- Able to develop other positive relationships

**Stimulation**

- Spends much time alone
- Child not exposed to new experiences

**Guidance and Boundaries**

- Can behave in an anti-social way
- Inconsistent boundaries offered

**Stability**

- Key relationships with family members not always kept up
- May have different carers
- Difficulties with attachments

**Family and Environment Factors**

**Family History and Functioning**

- Parents have some conflicts/ difficulty that can involve the children Experienced loss of significant adult
- May look after younger siblings
- Parent has health difficulties

**Wider Family**

- Some support from family/ friends

**Housing**

- Adequate/ poor housing
- Family seeking asylum or refugees

**Employment**

- Wage earner has periods of no work
- Parents have limited formal education
- Parents stressed by unemployment

**Income**

- Low income

**Family's Social Integration**

- Family may be new to the area
- Some social exclusion problems

**Community Resources**

- Adequate universal resources but family may have access issues

**1: Child Achieving Expected Outcomes - has no current additional needs**

**Development needs of child/ young person**

**Health**

- Physically well
- Adequate diet/ hygiene/ clothing
- Developmental checks/ immunisations up to date
- Dental and optical care as needed
- Health appointments are kept
- Developmental milestones appropriate
- Speech and language development met
- Appropriate height and weight
- Healthy lifestyle
- Sexual activity appropriate for age
- Good state of mental health

**Education and Learning**

- Skills/Interests
- Success/achievement
- Cognitive development
- Access to books/toys, play

**Emotional and Behavioural Development**

- Feelings and actions demonstrate appropriate responses
- Good quality early attachment
- Able to adapt to change
- Able to demonstrate empathy

**Identity**

- Positive sense of self and abilities
- Demonstrates feelings of belonging and acceptance
- A sense of self
- An ability to express needs

**Family and Social Relationships**

- Stable and affectionate relationships with care givers
- Good relationships with siblings
- Positive relationships with peers

**Social Presentation**

- Appropriate dress for different settings
- Good level of personal hygiene

**Self-care Skills**

- Growing level of competencies in practical and emotional skills, such as feeding, dressing and independent living skills

**Parent and Carer Factors**

**Basic Care**

- Provide for child's physical needs: food, drink, appropriate clothing, medical and dental care

**Ensuring Safety**

- Protect from danger or significant harm, in the home and elsewhere

**Emotional Warmth**

- Show warm regard, praise and encouragement

**Stimulation**

- Facilitates cognitive development through interaction and play
- Enable child to experience success

**Guidance and Boundaries**

- Provide guidance so that child can develop an appropriate internal model of values and conscience

**Stability**

- Ensure that secure attachments are not disrupted
- Provide consistency of emotional warmth over time

**Family and Environment Factors**

**Family History and Functioning**

- Good relationships within family, including when parents are separated
- Few significant changes in family composition

**Wider Family**

- Sense of larger family network and good friendships outside of the family unit

**Housing**

- Accommodation has basic amenities and appropriate facilities

**Employment**

- Parents able to manage the working or unemployment
- Arrangements and do not perceive them as unduly stressful

**Income**

- Reasonable income over time, with resources used appropriately to meet individual needs

**Family's Social Integration**

- Family feels integrated into the community
- Good social and friendship networks exist

**Community Resources**

- Good universal services in neighbourhood





### Appendix 3 - Role of the Nominated Safeguarding Governor

#### 1 Overview

- 1.1 The members of the School Council, described in this document as governors, acknowledge and understand that they have collective duties and responsibilities to safeguard and promote the welfare of children and to ensure that the School's safeguarding policies, procedures and training are effective and comply with the law at all times.
- 1.2 The School Council is determined to promote the well-being of children within the School's care and recognises that well-being extends beyond the protection from harm and neglect into areas such as promoting:
  - 1.2.1 physical and mental health and emotional well-being;
  - 1.2.2 social and economic well-being;
  - 1.2.3 opportunities for education, training and recreation; and
  - 1.2.4 opportunities for contributing to society.
- 1.3 The School Council has nominated one of its members to champion best safeguarding practice in the School, supporting the School Council not just to discharge its duties under legislation and guidance but to move beyond regulatory compliance. The Nominated Safeguarding Governor will:
  - 1.3.1 support the School Council in its commitment to promote the well-being of children within the School's care; and
  - 1.3.2 take leadership of the School's safeguarding arrangements, liaising with external agencies where this is required.
- 1.4 The appointment of the Nominated Safeguarding Governor on the terms set out below forms part of the School Council's acceptance of and response to its duties, not a delegation or abrogation of them.

#### 2 Statutory Guidance

- 2.1 Statutory guidance Keeping Children Safe in Education (September 2023) defines safeguarding and promoting the welfare of children as:
  - 2.1.1 protecting children from maltreatment;
  - 2.1.2 preventing impairment of children's health or development;
  - 2.1.3 ensuring children are growing up in circumstances consistent with the provision of safe and effective care; and
  - 2.1.4 taking action to enable all children to have the best outcomes.
- 2.2 Statutory guidance Working Together to Safeguard Children (December 2023) requires a wide range of institutions, including independent schools, to have arrangements in place that reflect the importance of safeguarding and promoting the welfare of children, including:
  - 2.2.1 a clear line of accountability for the provision of services designed to safeguard and promote the welfare of children;
  - 2.2.2 a senior board level lead to take leadership responsibility for the organisation's safeguarding arrangements;



- 2.2.3 a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services;
  - 2.2.4 clear whistleblowing procedures, suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed;
  - 2.2.5 arrangements which set out clearly the processes for sharing information, with other professionals and with Somerset Safeguarding Children Partnership;
  - 2.2.6 a designated professional lead for safeguarding;
  - 2.2.7 safe recruitment practices for individuals whom the organisation will permit to work regularly with children, including policies on when to obtain a criminal record check;
  - 2.2.8 appropriate supervision and support for staff, including undertaking safeguarding training; and
  - 2.2.9 clear policies in line with those from Somerset Safeguarding Children Partnership for dealing with allegations against people who work with children.
- 2.3 The Prevent Duty Guidance for England and Wales (December 2023) emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

### 3 Role and Duties

- 3.1 The main role and duties of the Nominated Safeguarding Governor on behalf of the School Council (which retains overall responsibility) are to:
- 3.1.1 champion the promotion of well-being, safeguarding and child protection issues at the highest level within the School;
  - 3.1.2 encourage other members of the School Council to develop their understanding of the School Council's responsibilities with regard to well-being, safeguarding and child protection and support them in the performance of these duties;
  - 3.1.3 ensure that the School Council puts in place a suitable child protection and safeguarding policy (CPS Policy) and associated procedures which have proper regard to prevailing regulations, guidance, standards and advice;
  - 3.1.4 be familiar with Somerset Safeguarding Children Partnership guidance and procedures relating to safeguarding and child protection and associated issues, contributing to inter-agency working;
  - 3.1.5 contribute to ensuring any deficiencies in the School's safeguarding practices brought to governors' attention from any source are investigated and addressed;
  - 3.1.6 meet regularly with the School's Designated Safeguarding Lead in order to monitor the effectiveness of the School's CPS Policy and procedures and the implementation of these across the School. It is recommended that this is at least a termly meeting;
  - 3.1.7 ensure that the School Council receives a report on the implementation of the School's CPS Policy and procedures to support the full School Council's review of safeguarding in the School at least annually (or earlier if needed in response to changes to the law, policy or statutory guidance or as appropriate in response to specific incidents) in accordance with all statutory guidance and guidelines adopted by the School Council;



- 3.1.8 alert the School Council to any incident which the Nominated Safeguarding Governor regards as a substantiated safeguarding incident;
- 3.1.9 ensure that the Designated Safeguarding Lead is part of the School's senior leadership team, and has sufficient time and resources at his / her disposal to carry out his / her duties effectively;
- 3.1.10 ensure that a Deputy Designated Safeguarding Lead is identified;
- 3.1.11 ensure that the Designated Safeguarding Lead and Designated Deputy Safeguarding Lead receive appropriate training which is updated in line with SSCP policy;
- 3.1.12 ensure that arrangements are in place for the inclusion of child protection training on the School's procedures in an induction programme for all people working in the School, no matter for how long, nor the status of that individual;
- 3.1.13 ensure safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff and volunteers;
- 3.1.14 review the School's Single Central Register on at least a termly basis, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies. It is recommended that at least one review per year is on an unannounced basis;
- 3.1.15 be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are properly addressed through the curriculum and schemes of work;
- 3.1.16 ensure that the School Council carries out regular risk assessments of factors particular to the School which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special educational needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, female genital mutilation and cyberbullying; and
- 3.1.17 both provide to, and seek from, the Local Authority and other relevant agencies information about how the School Council's duties in respect of safeguarding and child protection have been discharged, where appropriate or requested.
- 3.1.18 ensure that required safeguarding training is carried out and that relevant policies and procedures are updated and distributed prior to the start of the Michaelmas Term each year, or as necessary following statutory updates or significant incidents
- 3.2 The identity of and contact details for the Nominated Safeguarding Governor, together with an outline of his / her duties, will be publicised widely within the School community to ensure that pupils, parents, staff and governors understand the purpose and importance of the role.
- 3.3 To the extent that the role and duties of the Nominated Safeguarding Governor conflict with those assumed by others within the School, including the Custos, the School Council will take all necessary action to resolve those conflicts so as to achieve clarity about respective roles and duties. This may include amendments to the CPS Policy, the School's constitutional documents and/or other governance arrangements applicable to the School.
- 3.4 Each of the Nominated Safeguarding Governor and the Custos will undertake appropriate training in accordance with Somerset Safeguarding Children Partnership' recommendations to fulfil the respective role and duties.



#### 4 Allegations against staff

- 4.1 The School's CPS Policy sets out the detail of who is responsible for liaising with the Local Authority Designated Officer(s) in the event of allegations of abuse made against the Head, member of the School Council or member of staff of the School.
- 4.2 Where, in the absence of the Custos, the Nominated Safeguarding Governor is responsible for taking the lead in liaising with the Local Authority and/or other partner agencies, he / she will:
  - 4.2.1 notify the Designated Officer of the Local Authority immediately before any action is taken;
  - 4.2.2 ensure, with Local Authority support, that appropriate action is taken in accordance with agreed Somerset Safeguarding Children Board procedures;
  - 4.2.3 attend initial and subsequent strategy meetings as required if other agencies are involved;
  - 4.2.4 oversee an investigation under the School's internal employment procedures when the other agencies' involvement is at an end or as soon as it is confirmed that this may take place; and
  - 4.2.5 with the Designated Safeguarding Lead, review the School's CPS Policy and procedures, taking advice from the Designated Officer of the Local Authority, and making the necessary changes.
- 4.3 At the conclusion of a case in which an allegation is substantiated, the Nominated Safeguarding Governor will conduct a review the circumstances of the case seeking appropriate input from within and outside the School to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. The Nominated Safeguarding Governor will ensure that a full report is available for the School Council.

#### 5 Appointment of Nominated Safeguarding Governor

- 5.1 The Nominated Safeguarding Governor is Charis Cavaghan-Pack and can be contacted on 07771 908514 or at [CCavaghan-Pack@kings-taunton.co.uk](mailto:CCavaghan-Pack@kings-taunton.co.uk).
- 5.2 If the Nominated Safeguarding Governor is unavailable his / her role and duties will be carried out by the Custos.
- 5.3 The appointment of the Nominated Safeguarding Governor has been made by the School Council after full consideration of the roles and responsibilities and the qualities required by potential candidates to discharge them effectively.



**Appendix 4 - Cause for Concern Reporting Form**

This form is to be completed on all occasions when there is cause for concern in relation to the welfare of a child and given to the Designated Safeguarding Lead.

DETAILS OF THE STAFF MEMBER REPORTING CONCERNS	
Full name	
Post held	

DETAILS OF PUPIL	
Full name	
Date of birth	
Home address	
Name of parent	

**Do these concerns relate to a specific incident? If YES complete Section A; if NO complete Section B**

SECTION A	
Date and time of incident	
Place of incident	
Date this form completed	
Form completed by (please print)	
Brief circumstances of incident, to include any precipitating factors and injuries sustained (if applicable)	

NAME(S) OF POTENTIAL WITNESSES



<b>SECTION B</b>
Details of concern (specific or cumulative?), give dates, nature of concern and actions taken

<b>ANY OTHER RELEVANT INFORMATION</b>

Signed	
Date	

Discussed with DSL	Y / N
Agreed	

Form passed to DSL	Y / N
Date	

**FOR ATTENTION OF DESIGNATED SAFEGUARDING LEAD AND HEAD**

Strategy meeting with Children's Social Care / Police	Y / N
Date	

Basis of decision / further action agreed (if any)
--

## Appendix 5 - Somerset CC Children and Young People's Directorate

The practice of members of the Children and Young People's Directorate is guided by their Eligibility Criteria.

### 1. Introduction

Teachers, who better than most, have the opportunity to witness signs of distress, emotional deprivation and significant changes in the behaviour of their pupils over a period of time, will appreciate that a fundamental problem may exist. Prompt and sensitive action, in accordance with the approved procedures, may sometimes prevent actual abuse or reduce the level of harm it if has occurred.

### 2. Action to be taken following concerns about abuse

The nature and degree of concern will determine the response necessary:

#### 2.1 Investigation of Concerns about Child Abuse

There are broad categories of concern:

a) **Cases requiring immediate formal referral to Children's Social Care Department, or Police**

Immediate formal referral is required in any cases of significant physical injury, life-threatening neglect, serious threats of abuse and clear allegations or disclosures by a child or third person of child sexual abuse.

Once referral has been made, the Children's Social Care Department will initiate the approved formal procedures in collaboration with other key services.

b) **Cases requiring discussion with Children's Social Care Department or Police**

Discussion and evaluation involving the senior staff / school co-ordinator for child abuse and subsequent consultation with the Children's Social Care Department is required whenever the child shows signs of failure to thrive, general neglect, emotional abuse, compelling evidence that child sexual abuse may have occurred, or where there is a suspicion that abuse is likely to occur.

Where concerns are enhanced following this procedure, there is likely to be urgent follow up action by the Children's Social Care Department who will inform and consult with the Police on subsequent action. A watching brief may be kept where some concerns remain, or no further action where there is a well founded alleviation of concerns.

c) **Cases requiring discussion within the School**

Discussion and evaluation involving the senior staff / school co-ordinator for child abuse is always required where a teacher's suspicion that child abuse or child sexual abuse may have occurred is based on behavioural indicators, physical signs / symptoms or information received.

The outcome will lead to an immediate confidential discussion with the Children's Social Care Department where concerns are enhanced. The Children's Social Care Department will make confidential enquiries of other agencies and professionals and report back to the School. A decision on further action will then be made.

NB In all instances when child abuse is formally investigated it will be the Children's Social Care / Police who will inform the parents of the concerns.



### **3. Other Issues**

#### **3.1 Records**

Where there are strong and clear indications that abuse has occurred, detailed records must be kept by the DSL, including all actions and communications arising from any case. Written confirmation must follow telephone messages and other personal communications.

Where suspicions are aroused but not confirmed, the DSL should devise a means of keeping appropriate records in a way which does not convey false and / or potentially damaging allegations about an individual. Particular note should be taken of the County Council's wish to make files and records as open as possible, with safeguards for highly confidential information.

#### **3.2 Case Conference**

The DSL and/or class teacher will be invited to relevant case conferences if these are convened as part of the follow up action.

Attendance at case conferences should be given high priority as an important expression of the School's duty of care to its pupils. Copies of the minutes will be forwarded to the DSL with the name of the agreed key worker.

Appropriate staff will be warned by the DSL to be alert to further evidence of abuse to a particular child or other members of the same family in the School.

#### **3.3 Injuries requiring urgent medical attention**

A school should follow the normal course of action (i.e. secure appropriate medical attention at a hospital or other medical centre). Parents should be informed that their child has been taken to a doctor, but no opinion should be offered about the cause of any injury. In such cases, the Children's Social Care Department will have been informed, as under 2.1 (b) above.

#### **3.4 Curriculum**

Schools considering the implementation of a programme of child protection related material (e.g. personal safety, stranger danger) should consult the appropriate Somerset Children's Social Care Divisional Office and Education Adviser on suitability and presentation.

### **4. Conclusion**

Child abuse in its various forms is too serious a matter to be left to chance. A school's response must be governed by the approved procedures <https://swcpp.trixonline.co.uk/>, which are based on two fundamental principles:

- a) that the safety of the child is paramount;
- b) that the agencies involved have all subscribed to the procedures and will co-operate fully in achieving the safety of children so affected.

#### **4.1**

Clearly, the identification of abuse and the remedial action, which follows, can injure relationships with parents. In spite of this, it is recognised that teachers are an important front-line group in identifying suspected, actual or potential abuse. Teachers should be able to protect their position and justify their actions by demonstrating that any action they take is in the interests of the child, in consultation with the key agencies, after the exercise of sound judgement in the context of these guidelines. Teachers can be assured that practice, which meets these criteria, supported by detailed records, will always receive the support of the School and the Local Authority.

## Appendix 6 - Children Missing in Education

### Background and Government Statute/Guidance

In 2002 the Department for Education and Skills (DFES) set a target in its strategic framework document that stated by 31 December 2005, robust multi-agency systems will be in place in each Local Authority to identify and track children missing education or at risk of doing so. In February 2007 the DFES published Statutory guidance for local authorities in England to identify children not receiving education – which requires all local authorities to make arrangements to enable them to establish (so far as it is possible to do so) the identities of children residing in their area who are not receiving an education.

Statutory guidance was issued in January 2009 to place implementation of the duty in the revised strategic context; to reflect priorities that have emerged since the original version was published; and to reflect local authorities' initial experience of implementing the duty. A further revision was issued in April 2013.

**The definition of Children Missing Education** refers to all children of compulsory school age who are not on a school roll, receiving a suitable education or who are not receiving education otherwise than being at school (for example, at home, privately or in alternative provision).

A suitable education is defined as “efficient full time education suitable to his/her age, ability & aptitude and to any special educational needs he/she may have”.

The duty does not apply in relation to children who are registered at a school but who are not attending regularly. The duty complements and reinforces duties that already exist for School to monitor attendance and it is important already have a duty to monitor attendance through the daily attendance register and to make returns to local authorities where the attendance of individual pupils gives cause for concern. (Further information on this duty is available at:

<http://www.education.gov.uk/School/pupilsupport/behaviour/attendance>

The duty does not apply to children who are being educated at home. Monitoring arrangements already exist for children being educated at home. Parents have a duty to ensure that their children receive a suitable full-time education either by regular attendance at school or otherwise (under section 7 of the Education Act 1996) and they may choose, as is their right, to provide this by educating their children at home.

In paragraph 17.97 of the **Victoria Climbié inquiry report 2003**, Lord Laming recommends that front-line staff in each of the agencies which regularly come into contact with families with children must ensure that in each new contact basic information about the child is recorded. This must include the child's name, address, age; the name of the child's primary carer, the child's GP and the name of the child's school if the child is of school age. Gaps in this information should be passed on to the relevant authority in accordance with the local arrangement.

The **Children Act 2004** places a duty on all agencies to work together to promote the welfare of children and to share information. This principle underpins this policy and there is an expectation that all agencies will work together to ensure children are safely on a school roll. Guidance on information sharing and tools for integrated working can be found on:-

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

A key aspect that has become an expectation in recent years is that relevant agencies should work together locally to design and deliver better and more integrated, preventative services to children and young people. The introduction of the Common Assessment Framework, which improved information sharing procedures, and the development of the Lead Professional role to support this approach. Implementation of the duty to identify children who are not receiving a suitable education, introduced by the Education and Inspections Act 2006, should be embedded in the Local Authority's overarching preventative strategy, to ensure that these children receive the full range of services they need.

Lord Laming's report, published in March 2009, following the death of Baby P in Haringey stated that recent Serious Case Review research by University of East Anglia found that 68% of children of statutory school-age who died or experienced significant harm had shown signs of poor school attendance.

The implementation of the duty to identify children not receiving a suitable education needs to take into account that Schools are a service which can quickly identify problems and issues, the potential for future problems, and intervene effectively, working with other services where necessary. The duty on School to promote pupil well-being emphasises this contribution.

Adopting the process steps in this guidance will help the Somerset County Council Children's Services meet statutory duties, relating to identifying children missing from education, plus those at risk of going missing, helping them move back into education (or alternative provision) and maintaining contact to prevent them slipping through the net again. This will help ensure all children and young people receive the universal services to which they are entitled.

**The main reasons why children miss education:**

There is considerable research available which identifies the reasons for children and young people being 'missing from school'. The most common reasons include:

- Failing to be registered at a school at age 5
- Failing to make a successful transition
- Exclusion (formal and informal)
- Mid-year transfer of school
- Families moving into a new area

Some children living in certain circumstances face more obstacles in being able to receive a suitable education. Amongst these are (this list is not exclusive):

- Children and young people under the supervision of the youth justice system
- Children from families fleeing domestic violence
- Children of homeless families, perhaps living in temporary accommodation, house of multiple occupancy or Bed and Breakfast;
- Children who run away or go missing from home or care: for further information, see <https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>
- Children who are subject to a child protection plan
- Unaccompanied asylum seekers; children of refugees and asylum seeking families
- Children in new immigrant families, who are not yet established in the UK and may not have fixed addresses
- Children of migrant worker families (who may not be familiar with the education system)
- Children of families who can be highly mobile, e.g. parents in the armed forces, Gypsy, Roma and Traveller families
- Children who do not receive a suitable education whilst being educated at home
- Children who have been bullied
- Children who have suffered discrimination on the grounds of race, faith, gender, disability or sexuality
- Children at risk of sexual exploitation, including children who have been trafficked to, or within the UK
- Children at risk of "honour"-based violence including forced marriage or female genital mutilation
- Looked after children/children in care; children who go missing from care
- Children who are privately fostered
- Young carers
- Teenage parents
- Children who are permanently excluded from school, particularly those excluded unlawfully e.g. for problematic behaviour or offending.
- Children whose parents take them abroad for a prolonged period
- Children who were registered with a school that has closed and have not made a transition to another school
- Children of parents with mental health problems
- Children of parents with learning difficulties
- Children with long term medical or emotional problems.
- Children who meet the descriptions above can have needs that go beyond the reach of universal services.

When local authorities identify/are made aware of children/young people in any of these groups who may not be receiving a suitable education, they should seek advice from the relevant specialist team/partner agency.



When a child is absent from education, it is possible that this is due to other behaviour, associations or activity that puts them at risk of harm. This could be of their own choice or by the actions of another person or persons influencing their behaviour and choices. They could be the victims of abuse, neglect or crime, including sexual exploitation, forced marriage, trafficking, domestic servitude or abduction. It is important to recognise when young people are in situations where they are vulnerable and to take appropriate action.

In any case where there is concern for a child's welfare this should be referred to Somerset County Council Children's Services. If there is reason to suspect a crime has been committed, the police should also be involved. Where there is genuine concern that a young person's safety and/or well-being is at risk, it is essential to take action quickly, as delays can see problems escalate, and also hamper an effective investigation of the circumstances in which the child is living. To ascertain whether it is appropriate to make a referral to children's social care and/or the police, a number of issues should be considered, listed below:

- Have there been suspicions in the past concerning this child and family members, which together with any sudden disappearance from education provision are worrying?
- Have there been any past concerns about the child associating with significantly older young people or adults? For example, are they picked up from school by older males in cars who are not related to them?
- Was there a significant incident prior to the child's unexplained absence from education provision?
- Is the child/young person the subject of a child protection plan or has there been past involvement with children's social care services about matters of child protection concern?
- Is the child/young person looked after by a Local Authority?
- Is there current children's social care involvement with this child or one of their siblings and their parents, fathers as well as mothers?
- Is there a history of mobility without full explanations as to why?
- Are there issues raised by the child or by their family's immigration or asylum status?
- Has there been school or Local Authority intervention in relation to attendance, e.g. visits by Children's Services Attendance Staff, parenting contracts and fast-track to attendance?
- Is there a good reason to believe that the child's absence may be the result of them being the victim of a crime? The following questions could assist a judgement:
- Is the child's absence from school very sudden, out of character, and without any satisfactory explanation being provided by their family or carer?
- Has the child/young person said something to give rise to concern?
- Has the child/young person gone missing with their family?
- Has the child/young person gone missing without their family?
- Is there any reason related to the child's ethnicity or culture to believe that the child/young person is at risk of harm?

If the answer to any of the above questions is yes, then a referral to Children's Services Social Care team and/or the police should be made - local procedures should be followed in line with Working Together to Safeguard Children which can be found at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)

Pupils join a school roll on the expected first day of attendance and must be listed in both admissions & attendance registers from that day.



**When a pupil fails to start at a new school when expected:**

When a pupil is expected to join the School at a normal time of starting (e.g. Nursery, Reception, Year 7 or Year 9) and he/she does not arrive, the School should firstly try to make contact with the parents by phone, e-mail or letter. The child will be on the School attendance register and should be marked as an unauthorised absence. If after one week no contact has been made the School should contact the Somerset County Council Children's Services to find out if the child had been registered elsewhere. After two weeks the School should contact the Somerset County Council Children's Services who will follow the procedures for 'missing pupils'.

If a child is expected to join the School mid-term and fails to arrive, the School firstly try to make contact with the parents either by phone, e-mail or letter. If after two weeks the School has been unable to make contact, a referral should be made to the Somerset County Council Children's Services who will follow the procedures for missing pupils.

**Prolonged absence:**

If a pupil is absent for a prolonged period or fails to return from a holiday or fixed term exclusion, the School should follow the normal procedures for investigating pupil absence (i.e. telephone calls, letters, invitations to meetings at the School etc). If the child does not return to school the absence will be unauthorised and should be referred to the Somerset County Council Children's Services who will follow their procedures for 'missing pupils'. If it is established that the child no longer resides at that address and their whereabouts is unknown, the School will receive a letter from the AIO advising them of the situation and the School can remove the pupil from roll and follow the actions as laid out below.

**Regulations about when a school may delete a pupil's name from its Admissions Register.**

There are strict rules on when School can delete pupils from their admissions register. These are outlined in Section 8 of the Education (Pupil Registration) Regulations 2006 and 2011(as amended).

The following are the prescribed grounds on which the name of a pupil of compulsory school age shall be deleted from the Admission Register (and therefore from the Attendance Register):

- where the pupil is registered at the School in accordance with the requirements of a school attendance order, that another school is substituted by the local education authority for that named in the order or the order is revoked by the local education authority on the ground that arrangements have been made for the child to receive efficient full-time education suitable to his age, ability and aptitude otherwise than at school;
- except where it has been agreed by the proprietor that the pupil should be registered at more than one school:
- where a pupil is registered at more than one school, that he has ceased to attend the School and the proprietor of any other school at which he is registered has given consent to the deletion;
- In a case that he has ceased to attend the School and the proprietor has received written notification from the parent that the pupil is receiving education otherwise than at school;
- except in the case of a boarder, that he has ceased to attend the School and no longer ordinarily resides at a place which is a reasonable distance from the School at which he is registered;
- in the case of a pupil granted leave of absence exceeding ten school days for the purpose of a holiday in accordance with the regulation set out by Somerset County Council Children's Services, that
  - (i) the pupil has failed to attend the School within the ten school days immediately following the expiry of the period for which such leave was granted;
  - (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the School by reason of sickness or any unavoidable cause; and
  - (iii) both the proprietor and the local education authority have failed, after reasonable enquiry, to ascertain where the pupil is;
- that he is 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 nor his parent has indicated to the School the intention to continue to attend the School after ceasing to be of compulsory school age;
- that he has been continuously absent from the School for a period of not less than twenty school days and at no time was his absence during that period authorised by the proprietor in accordance with the regulations set out by Somerset County Council Children's Services:
  - (i) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the School by reason of sickness or any unavoidable cause; and



- (ii) both the proprietor of the School and the local education authority have failed, after reasonable enquiry, to ascertain where the pupil is;
- that he is detained in pursuance of a final order made by a court or of an order of recall made by a court or the Secretary of State, that order being for a period of not less than four months, and the proprietor does not have reasonable grounds to believe that the pupil will return to the School at the end of that period;
  - that the pupil has died;
  - that he will cease to be of compulsory school age before the School next meets and the relevant person has indicated that he will cease to attend the School;
  - in the case of a pupil at a school other than a maintained school, an Academy, a city technology college or a city college for the technology of the arts, that he has ceased to be a pupil of the School;
  - that he has been permanently excluded from the School; or
  - where the pupil has been admitted to the School to receive nursery education, that he has not on completing such education transferred to a reception, or higher, class at the School.

Where the pupil is a boarder at a maintained school or an Academy;

(i) charges for board and lodging are payable by the parent of the pupil and

(ii) those charges remain unpaid by the pupil's parent at the end of the School term to which they relate.

In a case not covered by paragraph (1) (a)-(j) or (m), the name of a child who has under arrangements made by a local education authority become a registered pupil at a special school shall not be removed from the admission register of that school without the consent of that authority, or if that authority refuse to give consent, without a direction of the Secretary of State.

**Removal from roll for any reason other than those specified overleaf is illegal.**

**Home Education:** In the event of a parent informing the School that s/he is removing the child to educate him/her at home, the School should complete a referral form and send a copy of the letter to the Lead Teacher for Services to Home Educators and then remove the child's name from the School roll. The Lead Teacher for Services to Home Educators will make arrangements for the Somerset County Council Children's Services to satisfy itself that the education being provided is 'suitable and efficient'.

**Fixed Term Exclusions:** In the event of a pupil being excluded for a fixed term the School must provide work. If the exclusion is for more than 5 days, the School has a duty to arrange suitable full-time education provision for the pupil. Information on this can be found on

<http://www.education.gov.uk/aboutdfe/statutory/g00210521/statutory-guidance-regs-2012/guidance>

If a pupil fails to return to school after fixed term exclusion the School should treat the absence as an unauthorised absence and contact the Children in Need team attendance staff so a home visit can be arranged.

**Actions a school must take when a pupil's name is deleted from the Admissions Register:**

When a pupil is deleted from the Admission register the School must clearly indicate the date and the reason for the removal from roll. In the event of a pupil moving to another school the name of the School should be indicated and the pupil's records should be sent to the new school within 15 days.

When a pupil's name has been deleted from the register, the School must inform Somerset County Council Children's Services.

The school must also notify the Somerset County Council Children's Services as soon as the ground for deletion is met in relation to that pupil, and in any event no later than deleting the pupil's name from the register.

**WHENEVER A CHILD JOINS OR LEAVES A SCHOOL THEN A TRANSFER FILE MUST ACCOMPANY HIM/HER.**

**Actions required:**

If a school knows which school a child is moving to the School should ensure that Transfer File (TF) is sent to the receiving school as quickly as possible.

Should a child leave school without notice being given, the School should try to make contact with the parents. If after 10 days of non-school attendance the School has been unable to contact the parents the School should contact the Somerset County Council Children's Services who will work with the School and make reasonable efforts to try and identify the child's current whereabouts/destination. **If the child is on the Child Protection Register or the School has particular child protection concerns about the child the School should immediately contact the local Social Care team.**

If after 20 working days such efforts prove unsuccessful the School should remove the child's name from its roll and again contact/follow up with the Somerset County Council Children's Services should be notified again.

If a file is sent to a known school but comes back as rejected by that school these should be treated as the child now being missing from education and the Somerset County Council Children's Services should be notified.

The Education (Pupil Registration) Regulations (2006) places a duty on Headteachers to inform the Local Authority of any pupil who is going to be deleted from the admission register. In accordance with the Regulations, this return to the Local Authority should be made as soon as the ground for deletion is met in relation to that pupil and in any event no later than deleting the pupil's name from the register.

**TABLE SHOWING MAIN REASONS FOR CHILDREN MISSING EDUCATION AND EACH AGENCY'S ROLES AND RESPONSIBILITIES**

MAIN REASONS FOR CHILDREN MISSING EDUCATION	AGENCY- Role and Responsibility
<p><b>Group 1</b></p> <p>Failing to be registered at a school at age 5</p> <p>Failing to make a successful transition</p> <p>Frequent moves of house including periods of homelessness or periods in a refuge</p> <p>Mid-year transfer of school</p>	<p><b>School</b> Follow up non-arrival Check the situation with the Admissions Team Refer to the area attendance staff Follow procedures for removing a name from a school roll if appropriate. Inform the Children Missing Education Assistant</p> <p><b>Admissions Team</b> Investigates situation Offering advice re a school place Processing requests</p> <p><b>Children in Need Team-Attendance Staff</b> Home visit to the family offering support if necessary Follow procedures for non-attendance if appropriate.</p> <p><b>Other agencies</b> Share knowledge Support the family ensuring the child engages with education</p>
<p><b>Group 2</b></p> <p>Family breakdown</p> <p>Persistent truancy leading to non-attendance (especially in Years 10 and 11)</p> <p>Disaffection resulting in pupil and/or parent dissatisfaction with the School and the parent withdrawing the pupil or 'being asked to leave'</p>	<p><b>School</b> Follow up absence Refer to the Children in Need Team attendance staff.</p> <p><b>Children in Need Team-Attendance Staff</b> Home visit to the family offering support Follow procedures for non-attendance if appropriate In cases of unofficial/illegal exclusion pass information to the strategic Attendance and Exclusions team.</p> <p><b>Other agencies</b> Share knowledge Support the family ensuring the child engages with education</p>



<b>Group 3</b>	
Exclusion (formal and informal)	<p><b>School</b> Follow procedures for excluding pupils Follow procedures for removing a name from a school roll. Inform the Children Missing Education Assistant</p> <p><b>Education Exclusions Service</b> Monitor that all procedures are followed, advising when necessary</p> <p><b>Admissions Team</b> Offering advice re a school place/ processing requests</p> <p><b>Children in Need Team Attendance Staff</b> In cases of unofficial/illegal exclusion pass information to the strategic Attendance and Exclusions team. Home visit to the family offering support if necessary.</p> <p><b>Other agencies</b> In cases of unofficial/illegal exclusion pass information to the strategic Attendance and Exclusions team. Support the family ensuring the child re-engages with education</p>

<b>Group 4</b>	
Families moving into a new area	<p><b>Admissions Team</b> Offering advice re a school place Processing requests</p> <p><b>Children in Need Team Attendance Staff</b> Offering advice if required Home visit to the family offering support if necessary Follow legal procedure if necessary</p> <p><b>Other agencies</b> Share knowledge Support the family ensuring the child engages with education.</p>



## Appendix 7 - Allegations Management and Whistle Blowing

Allegations management procedures should be followed when it is alleged that a staff member or volunteer has:

- Behaved in a way that has harmed 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 they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (*'transferable risk'*), including behaviour that may have happened outside of school

Allegations that do not meet the above harms test should be dealt with using the School's procedure for handling low level concerns.

All staff in School should be instructed that any allegation should be reported immediately to the Head. The only exception to this is if the allegation concerns the Head, in which case the allegation should be reported to the Custos. This instruction should be given to new staff as part of their induction and all staff should be regularly reminded that such allegations must be reported as above.

On being advised of an allegation which meets the criteria, the Head or Custos should contact the Local Authority Designated Officer (LADO) within 1 working day.

The LADO's role is to "provide advice and guidance to School and FE colleges, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process."

In Somerset the LADO is:

**Anthony Goble – 07823 537359**

### Useful Publications

All allegations against staff in School are dealt with in accordance with *Working Together to Safeguard Children* (December 2023) and *Keeping Children Safe in Education* (September 2023).

The South West Child Protection Procedures <https://swcpp.trixonline.co.uk/> also has useful guidance.

### Confidential Reporting/Whistleblowing

All schools should have a policy and procedures in place to address this eventuality and all staff should be aware of the steps that will be taken should they become involved in an allegation. They should also be aware of how to report concerns they may have in respect of the behaviour of any colleague. This is known as 'Confidential Reporting' (previously called 'whistleblowing') and all allegations management policies must include this.



## 1. Introduction

The School has adopted this policy and the accompanying procedures on confidential reporting, to enable members of staff to raise concerns internally and in a confidential fashion about child protection, fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the School's internal organisation.

## 2. Elements of the policy

The School's policy on confidential reporting demonstrates that the School:

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

## 3. Procedure

The detailed procedure is to be found in the School's Staff Handbook in Section 19.

The confidential reporting/whistleblowing policy is separate from the School's procedures regarding grievances. Employees should not use the confidential reporting procedure to raise grievances about their personal employment situation. Rather, this procedure is to enable members of staff to express a legitimate concern regarding the behaviour of another staff member within the School including any concerns, no matter how remote or apparently unsubstantiated. These may be related to child protection issues, 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.

## 4. 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 in order 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 by the person to whom it is reported (the Head/ Deputy Head /Director of Finances / Director of Operations or the Designated Safeguarding Lead if safeguarding issues are involved).

## 5. The Investigation

Any member of staff is at liberty to express their concerns to the relevant senior member of staff. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. 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 in the first instance with another senior member of staff and, thereafter, if the matter is not resolved, with the Custos, and in the absence of the Custos, the Nominated Safeguarding Governor.

## **6. External Procedures**

Where all internal procedures have been exhausted, staff have a right of access to the governors. 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:

- a) that exceptionally serious circumstances justify it;
- b) that the School would conceal or destroy the relevant evidence;
- c) that they would be victimised by the School; or,
- d) that the Secretary of State has ordered it.

## **7. Malicious Accusations**

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

## **8. Protection from Reprisal or Victimisation**

No member of the staff will suffer detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the confidentiality reporting procedures.

## Appendix 8 – EYFS Specific Matters

### SAFEGUARDING CHILDREN (EYFS)

The school has due regard to Section 3 of the Early Years Foundation Stage Statutory Framework For group and school-based providers (Safeguarding and Welfare Requirements).

### PRE-PREP POLICY FOR THE USE OF CAMERAS, MOBILE PHONES AND OTHER ELECTRONIC DEVICES

We accept that mobile technology is part of the ever changing, digital environment we live and work in. We very much aim to encourage responsible and appropriate use of technology rather than seeking to enforce unrealistic bans or restrictions.

We are, however, very aware of the possible dangers of the misuse of technology, specifically wearable devices. This policy therefore aims to provide guidance to staff, pupils, parents and visitors. It aims to do this ensuring privacy is protected, online safety is preserved, and valuable equipment is looked after appropriately.

With the evolution of mobile and wearable technology including camera facilities as standard, it is of the utmost importance that the way we deal with mobile phones and wearable devices in school, is planned for.

The welfare, protection and safety of every child in our care is of paramount importance, we take our responsibility to safeguard children seriously. We have procedures in place which we expect everyone to respect and to help promote the safety of the children in our care.

We have a **no use** of mobile phones policy whilst caring for children. It is our intention to provide an environment in which children, parents and staff are safe from images being recorded and inappropriately used in turn eliminating the concern of staff being distracted from their work with children and the inappropriate use of mobile phone cameras around children.

### **MOBILE PHONES & SMART WATCHES**

We believe our staff should be completely attentive during their working hours to ensure all children in the Pre-Prep receive good quality care and education. Mobile phones must **not** be used during working hours. Staff are permitted to keep their phones switched on in case of urgent calls, but they will be kept away from children and must be on silent.

Under no circumstances does the Pre-Prep allow a member of staff to contact a parent/carer using their personal device. Staff bringing personal devices into Pre-Prep must ensure there is no inappropriate or illegal content on the device. All staff must ensure their mobile phones are kept with their personal belongings, away from children (drawer, cupboard etc), throughout contact time with children. Staff are permitted to use their mobile phones during their lunch breaks away from the children.

The use of apple watches/smart watches etc, are also not permitted. Staff wearing smart watches will be asked to either remove them or leave them with their personal mobile phones. These can be worn only as a watch during all contact time with children with all other functions disabled.

The use of mobile phones/smart watches/other electronic devices is permitted in staff breaks or in staff member's own time when children are not in the vicinity.



It is the responsibility of all members of staff to be vigilant and to report any concerns to the Head of Pre-Prep or DSL (see whistleblowing policy).

All urgent calls are to be taken from the main Pre-Prep line, however if any staff member has a family emergency or similar, their mobile can be switched on but they must step outside of the room to take the call if ratios allow. If ratios won't allow for this to happen the mobile must be left in the office and the member of staff will be released to take the call. Prior permission must be sought from the Head of Pre-Prep.

During group outings a nominated staff member will take the allocated Pre-Prep mobile phone/s out with them in case of emergency. This should only be used for emergency calls and incoming calls from the school, under no circumstances must a member of staff take a personal call whilst caring for children. It is the responsibility of all staff members to be vigilant and report any concerns to the Head of Pre-Prep or DSL.

The Headmaster or DSL reserves the right to check the image contents of a member of staff's mobile phone should there be any cause for concern over inappropriate use of it. Should inappropriate material be found then our Local Authority Designated Office (LADO) will be contacted immediately, as well as the police. Guidance will be followed with regards to the employment status of that member of staff.

## Parents & Visitors

Parents or visitors who either arrive in the classroom areas using a mobile phone or take a call on a mobile should be immediately told to end their phone call or leave the premises. Visitors are signed into the school and informed to leave their personal belongings and mobile phones in their bags or office area. This will be reinforced by staff at the front desk and reminders placed in the Safeguarding brochure that every visitor receives on entering the school.

## CAMERAS & CAPTURING IMAGES

Photographs taken for the purpose of recording a child or group of children participating in activities or celebrating their achievements is an effective form of recording their progression in the Early Years Foundation Stage/KS1. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care.

- Only the designated Pre-Prep iPads are to be used to take any photo within the setting or on outings
- Images taken on these devices must be deemed suitable without putting the child/children in any compromising positions that could cause embarrassment or distress
- All staff are responsible for the location of the iPads; these should be placed within the lockable charging cabinets when not in use
- The iPads must be locked away at the end of every session
- Images taken and stored on the iPads must be downloaded as soon as possible, ideally once a week and it should be ensured they are then deleted from the iPad before being returned to the storage charging cabinet.
- Parental permission is obtained from the parent/carer on joining the setting to the use of photographs in the setting
- Photos taken on iPads can be uploaded to our closed Seesaw app that only approved relatives of that child have access to the individual child profiles. This will only occur when we have obtained all the parents' permission. Any child whose parent has not signed the permission form for photos on social media will not have their photo uploaded.

This policy is in place to protect and safeguard both children and staff



Appendix 9 – BSA Commitment to Care Charter



# Commitment to Care Charter

**BSA schools are committed to the highest duty of care and safeguarding**

Keeping boarders safe, secure and cared for are the main priorities for members.

**Everyone working in a BSA school will raise any concerns immediately**

'Everyone' includes all full or part-time staff, volunteers, governors and contractors. It also means pupils, such as prefects in boarding houses. 'Immediately' is without hesitation or delay, and 'abuse' is any suspicion, belief or evidence of abuse by an adult against a pupil or by a pupil against another pupil.

**BSA schools will follow all statutory safeguarding guidance and laws and report concerns to the relevant authority and the BSA**

Follow all 'safeguarding guidance and laws' means that all policies and procedures, including a school's guidelines for reporting, must comply with any applicable rules and expectations<sup>1</sup>, and in relation to any requirement to report to the police where necessary. 'Report concerns to the relevant authority' means to follow those guidelines and, if an unsatisfactory response is received, to escalate the concern. Report 'to the BSA' means to inform the BSA that a referral has been made, but without disclosing any details by which a case or an individual can be identified.

**BSA schools will support any present pupils affected by abuse and those who report concerns, and offer support to past pupils**

'Support' means to provide open, honest communication, provide counselling or similar services or referral to them. 'Offer of support' means referral to other organisations (e.g. the police for past pupils), counselling or similar services. Support will be given if there is no conflict of interest or legal restriction.

**BSA will support member schools which responsibly follow the Charter**

The BSA will support member schools to help them to follow the Charter. Member schools are expected to endorse the Charter clearly and strongly. The Safeguarding Governor is expected to have a clear oversight of safeguarding procedures and practice. BSA will review any instances where the Charter has not been responsibly followed (especially where cases and allegations have not been reported to the BSA as soon as it is permissible to do so) and consider any appropriate action.

<sup>1</sup>For member schools in England and Wales, this includes, but is not limited to, statutory guidance set out in Keeping Children Safe in Education (as updated from time to time). In other UK regions and overseas, this includes any relevant guidance or legislation.



**REPORTING SAFEGUARDING ISSUES TO BSA**

The following guidance indicates the circumstances where, under the terms of the Charter, a school should inform BSA of a safeguarding issue:

**WHEN must BSA be notified?**

BSA must be notified, as soon as it is permissible to do so, of any allegation against a member of staff, whether recent or non-recent, which the school has referred to the Local Authority Designated Officer (LADO) or equivalent, to the police or to Children's Services.

BSA must also be informed of any allegation of peer on peer abuse.

**WHAT information should be given?**

BSA needs to know only that an incident has been alleged and which statutory agencies are involved. BSA does not need to know specific details (unless a school chooses to provide them), nor will it normally be appropriate for BSA to know as soon as the allegation is received. At a later stage, schools should update BSA with any information which is in the public domain (eg. copies of letters to parents etc).

**WHO sees the information?**

BSA's Safeguarding Case Log is password protected and accessible only by the Chief Executive, Operations Director and Head of Safeguarding and Standards. Generic and statistical information, but not information which can identify a school, a case or any individual, may be shared with the Board and with the membership from time to time.

**WHY does BSA need the information?**

BSA needs this information to ensure schools are meeting their obligations under the Commitment to Care Charter, to maintain an overview of safeguarding practice within the sector and to be in a position to offer help and support to individual schools and to the membership as a whole. It is vital that BSA is seen as proactively promoting good safeguarding practice within our schools.

**HOW do I inform BSA?**

Please contact **Dale Wilkins**, Head of Safeguarding and Standards: [dale@boarding.org.uk](mailto:dale@boarding.org.uk) (+44 (0)7905 127 650) or email [safeguarding@boarding.org.uk](mailto:safeguarding@boarding.org.uk)

**PROCEDURE FOR DEALING WITH ALLEGED BREACHES OF THE BSA "COMMITMENT TO CARE" CHARTER**

BSA can become aware of alleged breaches of the "Commitment to Care" Charter (the Charter) through inspection reports, media coverage, by other sources of information or by a school's own disclosure.

When BSA becomes aware of a suspected breach of the Charter, BSA will:

- Write to the Head/Principal and Chair of Governors asking for full clarification
- Make any other enquiries which are appropriate in the circumstances
- Offer, where practical and appropriate, BSA support and guidance

If it is clear that NO breach has taken place, continued support and guidance will be offered to help manage any remaining issues.

If it remains unclear as to whether a breach has occurred, the Head of Safeguarding and Standards will gather any further relevant information, and make a report to the Board. If the evidence indicates that, on the balance of probability, there has been a breach of the Charter, appropriate action will be considered, which may include a review by the Board of a school's membership of BSA. Such review may result in suspension of a school's BSA membership for a specified period.

If a school is suspended from membership, BSA will consider whether it is appropriate to offer support and guidance during the period of suspension. Member schools may choose to appeal against the decision, in writing, to the Chief Executive of BSA for review by the Board.

Once all relevant matters relating to the breach have been addressed satisfactorily, including any recommendations made by inspection bodies, the school may apply for the suspension to be lifted.

Any member school failing to engage with BSA concerning suspected breaches of the Charter will be considered to be in breach of the Charter.

The Board may terminate, without right of appeal, the membership of any BSA member establishment which fails to address breaches of the Charter during any period of suspension or at any other time. No re-application for membership will be considered within two years from the date of such termination.

[www.boarding.org.uk](http://www.boarding.org.uk)

## Appendix 10 – Staff Code of Conduct

Cordial relations between teaching staff and pupils are at the heart of a happy and thriving school. At the same time, in the interests of all parties, professional boundaries must be observed on all occasions. Over-familiarity, however well intentioned, can lead to serious moral and legal complications. Since the implementation of the Children Act, the number of complaints against members of the teaching profession has risen sharply.

We must all be aware of the possibility of accusations and try to avoid hazardous situations. A teacher should never speak to or touch a pupil in a manner that could be construed as having sexual overtones or that could be interpreted as a physical assault. Both the action and the intention may subsequently give rise to problems. One-to-one meetings between staff and a pupil (particularly those who may be more vulnerable) should be approached with caution. If in doubt it is advisable to have somebody else present, or let someone else know the meeting is taking place/ inform a manager, record the reason and circumstance of the meeting, leave the door open, sit behind a desk etc.

Times when staff should be especially aware of placing themselves in a vulnerable position with a child are as follows: when in a boarding area of the School and changing arrangements in a nursery class. Other possible points include one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, and so on.

At King's College Prep pupils are not permitted into the boarding staff accommodation except by direct invitation for such events as meetings, quiet reading, weekend tea or to play games at which times they are supervised by boarding staff. Pupils are never permitted in the GAP accommodation. Staff access to the dormitory accommodation is protected by keypad security. Staff should not enter the boarding accommodation unless on boarding duties or by prior arrangement with Houseparents.

Good practice includes valuing and respecting children as individuals, and the adult modelling of appropriate conduct will always exclude bullying, shouting, racism or sexism.

Staff can protect themselves through:

- Maintaining open and unambiguous behaviour towards children – adopt safe working practices
- Respecting the rights, needs and position of children within the School
- Not condoning inappropriate behaviour in others
- Taking action to safeguard children
- Resisting favouritism
- Ensuring that any one-to-one tuition or sports coaching happens in a visible place.

Staff should not:

- Kiss or cuddle a young person
- Tickle or engage in other games involving physical contact
- Touch a pupil below the shoulder unless there is a justifiable reason
- Do anything of a personal nature for a pupil that they can do for themselves
- Force a pupil into a position or place
- Give a pupil a lift alone in a car unless planned and disclosed
- Engage in electronic communication with pupils (see Online Safety policy)



For further advice see the School's code of conduct for staff, Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (updated October 2015) and SSCP's own guidance.

This complete document was reviewed and approved by the School Council and signed on their behalf by the Custos on.

Signed: Linda Nash, Custos

Approved by the Heads on.

Signed: Michael Sloan, Head, King's College

Signed: Justin Chippendale, Head, King's College Prep School

This document will be reviewed not later than 31 March 2024.

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