

SAFEGUARDING POLICY

Safeguarding Policy: Principal Statement (1)

This policy statement and the six related policies - (i) *Induction of New Staff, Governors and Volunteers*; (ii) *Interaction with Pupils: Code of Conduct for Staff*; (iii) *Allegations of Abuse; Staff, Volunteers, Designated Safeguarding Leads, Heads*; (iv) *Confidentiality: Pupils*; (v) *Use of ICT, Mobile Telephones and other Electronic Devices*; (vi) *Taking, Storing and Using Images of Children* - come from the model policies recommended by the several independent schools associations and prepared for the Independent Schools' Bursars Association. The policy and its six related policies are in accordance with the requirements of the Department for Education (DfE) and particularly the DfE's statutory guidance of September 2016, *Keeping Children Safe in Education (KCSiE 2016)*, and the guidance concerning the Prevent Duty arising from the *Counter-Terrorism and Security Bill*. The policy and its six related policies are also in accordance with the requirements of the Independent Schools Inspectorate (ISI) and the locally agreed inter-agency procedures of the Local Safeguarding Children Board (LSCB) for Oxfordshire. The school furthermore adheres to the Boarding Schools' Association (BSA) *Commitment to Care Charter 2017*.

It is currently a legal requirement that schools' safeguarding policies are published on the schools' websites. Our policies are published not only on our website but also in the *Parent and Pupil Handbook*, the *Health Education Handbook* and the *Staff Handbook*. The *Parent and Pupil Handbook* is issued each July to parents of current and new pupils, and the Handbook is issued throughout the year to parents of prospective pupils. The *Staff Handbook* is issued each July to current members of staff and members of staff who will join the school in the coming year. The *Health Education Handbook* and additional copies of the *Parent and Pupil Handbook* and the *Staff Handbook* are available from the School Office to parents of current and prospective pupils, staff and volunteers.

Statement of Intent

The safety and wellbeing of every pupil is of paramount importance. Our business is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn in safety. We expect respect, good manners and fair play to be shown by everyone so that every pupil can develop his/her full potential and feel positive about him/herself as an individual. All pupils should care for and support each other.

What is Child Abuse?

Keeping Children Safe in Education (KCSiE 2016) defines safeguarding and promoting the welfare of children (young people under the age of 18) as follows:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

The National Society for the Prevention of Cruelty to Children (NSPCC) gives guidance as follows:

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child either directly by inflicting harm, or indirectly, by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them; or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

A child may be experiencing abuse if he or she is:

- frequently dirty, hungry or inadequately dressed
- left in unsafe situations or without medical attention
- constantly put down, insulted, sworn at or humiliated
- seeming afraid of parents or carers
- severely bruised or injured
- displaying sexual behaviour which does not seem appropriate for the child's age
- growing up in a home where there is domestic violence
- living with parents or carers involved in serious drug or alcohol abuse

Remember, this list does not cover every child abuse possibility. You may have seen other things in the child's behaviour or circumstances that worry you... Abuse is always wrong and it is never the young person's fault.

General signs that may indicate child abuse:

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

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

There are four types of child abuse as defined in the UK Government guidance, *Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children*, HM Government March 2015 (statutory guidance for adults working with children and families). The four types of abuse are defined as follows:

- Physical abuse
- Emotional abuse

- Sexual abuse
- Neglect

Abuse also includes peer on peer abuse, honour-based violence included forced marriages, female genital mutilation (FGM), child sexual exploitation and radicalisation. FGM must be reported to the police.

The school is committed to supporting the Prevent duty and the Channel programme. Oxfordshire is considered a low-risk area in terms of extremist behaviour, but should staff or governors have any concerns further advice can be sought from the Department for Education (DfE) using the designated telephone helpline and mailbox for non-emergency advice:

020 7340 7264

counter-extremism@education.gsi.gov.uk

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, female genital mutilation (FGM) 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.

Signs that may indicate physical abuse:

- bruises and abrasions (specific areas and relevant to age group)
- damage or injury around the mouth i.e. torn frenulum (web of skin joining upper lip and gum)
- bi-lateral injuries such as two bruised eyes
- marks – Bite, Weal, Fingernail, Strap/Belt, Welts, etc
- burns and scalds (unusual patterns and spread of injuries)
- deep contact burns such as cigarette burns
- severe bruising and injuries to the genital areas
- drowsiness or erratic behaviour without obvious explanation parental attitude to injuries

Typical abusive injuries may effect soft tissue areas such as the ears, inner arms or forearms (when raised defensively), chest/abdomen, inner thighs or the soles of the feet. Accidental injuries in the 'triangle of safety' (ears, side of face and neck, top of shoulders) are unusual. Concern should also be raised by injuries which are in a noticeable/unusual pattern or do not match the explanation offered.

Emotional Abuse

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 involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving children 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 serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Signs that may indicate emotional abuse:

- lack of self-confidence / esteem or continual self deprecation

- sudden speech disorders
- self harm (including eating disorders)
- drug, alcohol, solvent abuse
- lack of empathy (including cruelty to animals)
- concerning interactions between parent/carer and the child (eg. excessive criticism of the child or lack of boundaries)
- physical development lags e.g. milestones delayed or underweight, lethargic
- over-reaction to mistakes
- fear of new situations
- extremes of passivity and/or aggression
- compulsive stealing
- fear of parents being contacted
- deterioration in general well-being
- comments that cause concern

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 (eg 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.

Signs that may indicate sexual abuse:

- sudden changes in behaviour and school performance
- displays of affection which are sexual and age inappropriate
- self harm, self-mutilation or attempts at suicide
- alluding to secrets which they cannot reveal
- tendency to cling or need constant reassurance
- regression to younger behaviour, for example thumb sucking, playing with discarded toys, acting like a baby
- distrust of familiar adults, anxiety of being left with specific adults
- bed wetting / incontinence
- sleep disturbances or nightmare
- unexplained gifts or money
- depression and withdrawal
- eating disorders
- fear of undressing for gym activities
- sexual transmitted disease and pregnancy
- chronic problems with health such as vaginal discharges

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)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that may indicate neglect:

- constant hunger
- poor personal hygiene
- constant tiredness
- inadequate clothing
- frequent lateness or non-attendance at school
- untreated medical problems
- poor relationships with peers
- compulsive stealing and scavenging
- rocking, hair twisting and thumb sucking
- running away
- loss of weight or being constantly underweight (the same applies to weight gain, or being excessively overweight)
- emaciation
- low self-esteem
- poor dental hygiene

Bullying

Bullying is not defined as a form of abuse in *Working Together to Safeguard Children* but there is clear evidence that it is abusive and will include at least one, if not two, three or all four, of the defined categories of abuse. Bullying should be addressed as a safeguarding concern where there is 'reasonable cause to suspect that a child is suffering or is likely to suffer significant harm'.

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (eg hitting, kicking, theft), verbal (eg racist or homophobic remarks, threats, name calling) and emotional (eg isolating an individual from the activities and social acceptance of his/her peer group). It is recognised that abuse might arise in any situation in which pupils are in a relationship. The potential for peer on peer abuse is something concerning which vigilance must be maintained. Any disclosure concerning abuse by one or more pupils against another where there is suspicion that a child is suffering or likely to suffer significant harm must be referred immediately to one of the Designated Safeguarding Leads (DSL) and the Oxfordshire Safeguarding Children Board (OSCB).

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development, or, at the extreme, cause them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies. The Head keeps an *Anti-Bullying Log* in accordance with *ISI Regulation 146 – effective implementation of anti-bullying policy* that says that 'a school cannot be considered to meet its duty of care towards its pupils if it does not readily have a clear picture of bullying incidents throughout the school, whatever system has been chosen to record concerns'.

Bullying, harassment, victimisation and discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration, and we expect them to reciprocate towards each other, staff and the school. Any kind of bullying is unacceptable.

Peer on Peer Abuse

The school is aware of the possibility of peer on peer abuse. The school recognises that different forms of peer on peer abuse may take place and that gender issues can be involved. The school is aware that abuse of this nature is never tolerated or passed off as 'banter' or 'part of growing up'.

How victims of peer on peer abuse will be supported:

- The Designated Safeguarding Lead will consider what action is necessary to ensure the immediate safety of the identified victim/s and what further enquiries are necessary to assess any further risk. Advice will be sought from Oxfordshire Safeguarding Children Board, the Multi-Agency Safeguarding Hub (MASH) or the Children and Families Assessment Team
- Where a young person has abused a sibling, planning must include consideration of the support needs of the parents. If victim and perpetrator are members of the same family/household, before making any arrangements to return the perpetrator to the family/household it is critical to ensure that the victim's views have been heard and that s/he feels safe
- After receiving advice from at least one of the above named agencies, the DSL may conclude that the victim is not in need of a safeguarding plan, but may be a child in need of support to address her/his needs arising from the abuse – for example referral to Amazon Young People's Counselling Service, the Child and Adolescent Mental Health Services (CAMHS) or another victim support agency.

Honour-Based Violence (HBV)

Honour-Based Violence encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled as such. If in any doubt, staff should speak with the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found in the [Multi-agency statutory guidelines on FGM](#) and the Multi-agency guidelines, [Handling cases of forced marriage](#).

If staff have a concern regarding a child that might be at risk of HBV they should contact a Designated Safeguarding Lead who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. It is understood that if FGM has taken place there is a mandatory reporting duty placed on teachers.

Forced Marriage

The school is aware of and follows the *KCSiE 2016* guidance on Forced Marriage. Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

The Forced Marriage Unit has published [Multi-agency guidelines](#), focusing on the role of schools and colleges. School staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk .

Female Genital Mutilation (FGM)

School staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Staff are asked to note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. There is a statutory duty upon teachers along with regulated health and social care professionals in England and Wales to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#).

Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

Teachers have a mandatory duty to report to the police cases where they discover that an act of FGM appears to have been carried out. Teachers should consider and discuss any such case with the school's DSL and involve children's social care as appropriate.

Child Sexual Exploitation (CSE) and Drug Exploitation

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

Signs that may indicate child sexual exploitation:

- going missing from school/home/care placement
- associating with older people/adults
- isolation from family/friends/peer group
- physical symptoms including bruising/STIs
- substance misuse

- mental health
- unexplained possessions, goods and or money

The indicators can be spotted when speaking with the young person themselves or family/friends. The school is also aware of the further information about CSE in *KCSiE 2016* which is as follows:

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

Preventing Radicalisation

The school follows the *KCSiE 2016* guidance on this matter. Protecting children from the risk of radicalisation is seen as part of the 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. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Extremism also includes calls for the death of members of our armed forces, whether in this country or overseas. It is recognised that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Extremism can occur in many different ways and settings. Specific background factors may contribute to vulnerability, 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 use of the internet and social media in particular has become a major factor in the radicalisation of young people. The school uses the Smoothwall internet filtering programme which flags up any internet search it perceives as being related to radicalisation. This allows for early intervention and the identification of possible leanings.

As with other safeguarding risks, staff should be alert to changes in a pupil's behaviour which could indicate that the pupil might be in need of help or protection. Staff should use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

The school follows the guidance of *KCSiE 2016* as follows:

Specified authorities, including all schools, are subject to a duty under section 26 of the *Counter-Terrorism and Security Act 2015 (CTSA 2015)*, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty.

It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance. The statutory *Revised Prevent Duty guidance: for England and Wales for schools* summarises the requirements on schools in terms of four general themes:

- The school assesses the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.
- The Prevent Duty builds on existing local partnership arrangements. The school ensures that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. It is the duty of the school to ensure that there is an effective engagement with parents on Prevent. The school will discuss any concerns in relation to possible radicalisation with a pupil's parents in line with the school's safeguarding policies and procedures unless there is specific reason to believe that to do so would put the pupil at risk.
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to 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.

The Department for Education (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. The Government has launched [educate against hate](#), a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue. Smoothwall allows for early intervention as previously mentioned.

Channel

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

In relation to Prevent, the school focuses on the following key areas

- risk assessment
- working in partnership (eg with external agencies)
- staff training
- IT policies
- arrangements to respond to pupils who may be targeted or influenced to participate in radicalisation or extremism

- appropriate school systems and filtering in relation to IT in order to keep pupils safe from terrorist or extremist material

The school follows the guidance of *KCSiE 2016*:

Staff should understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at: [Channel guidance](#). E-learning channel awareness programme for staff is available at: [Channel General Awareness](#). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In addition to information sharing, a staff member making a referral to Channel may be asked to attend a Channel panel to discuss the individual referred in order to determine whether support is required.

Procedures for Dealing with Sexting Cases

The school is aware that, if any pupil were to be involved in sexting, it would be a criminal activity for both the sender and the recipient. The member of staff would tell the DSL, who would seek immediate advice from the OSCB, MASH or the police.

The school is aware of the DfE advice on [Searching, Screening and Confiscation](#) and advice published by the UK Council for Child Internet Safety, [Sexting in Schools and Colleges](#).

In terms of educating pupils about the dangers of sexting, the subject is included in Personal, Social, Health and Economic Education (PSHEE) lessons as part of pupils' education and the school's strategy to prevent the occurrence of sexting.

Child Trafficking and Modern Slavery

There are increasing reports of incidents of child trafficking and modern slavery, and Oxfordshire now has a Modern Slavery Board to respond to such incidents in the county.

Children Missing Education

All schools must inform the local authority of any pupil who fails to attend school regularly or who has been absent without the school's permission for a continuous period of 10 school days or more. The law requires all schools to have an admissions register and (with the exception of schools in which all pupils are boarders) an attendance register, both registers to be completed as required for every pupil in the school.

Special Educational Needs (SEN)

Children with special educational needs and disabilities are at a higher risk of harm than most other children, and yet keeping them safe can be a particular challenge. SEN children are more at risk of social isolation, reliance on others for personal care, reduced capacity to resist or report abusive behaviour, reduced access to someone to tell, vulnerability to bullying and intimidation and being away from home for respite care, residential living or hospitalisation. SEN children can be disproportionately affected by certain behaviours, eg bullying, without outwardly showing any signs. Staff may overlook the need for concern by wrongly assuming that indicators of possible abuse – eg behaviour, mood and injury – relate to the child's disability rather than other matters.

Children Staying with Host Families

The school does not offer places for pupils staying with host families. Pupils are required to board unless they are able to live with one or both parents (or grandparents or someone else appointed by the parent or local authority and approved by the school) within reasonable daily travelling distance of the school.

Transparency

Respect and mutual tolerance are required of every member of the school community. Parents/guardians have an important role in supporting the school. Copies of this policy and our other policies relating to issues of safeguarding are on our website, and we hope that parents and guardians will always feel able to take up with the school any issues or worries which they may have. We will never ignore an allegation of child abuse and will always investigate any concerns thoroughly. Open communications are essential.

The sharing of information among professionals working with children and their families is essential. In many cases it is only when information from a range of sources is put together that a child can be seen to be vulnerable, in need or at risk. Appropriate sharing with other practitioners and agencies is essential if children and families in need of support and services are to be identified at an early stage before problems become serious. Sharing can also enable information from different cases to be put together, so assisting the process of assessing levels of concern and potential risks.

Safer Employment Practices

The school follows the Government's recommendations for the safer recruitment and employment of staff who work with children, in accordance with Standard 4 of the Independent School Standards Regulations. Several senior members of staff and governors have received training in Safer Recruitment. All members of the teaching and non-teaching staff, including part-time staff, temporary and supply staff, and visiting staff (for example, musicians and sports coaches) are subject to the statutory safeguarding checks before starting work. All governors, volunteer helpers, contractors working regularly during term-time (for example, contract catering staff) and adult members of the families of members of staff who live on site are also vetted. The school is compliant with the *Childcare (Disqualification) Regulations 2009*. Staff working with or managing Early Years Foundation Stage (EYFS) pupils and/or other pupils under the age of 8 are required to complete the Oxfordshire County Council Staff Disqualification Declaration, guidance concerning which will be made available in preparation for completion of the declaration. Details of the checking are kept in a central register maintained by the Human Resources Manager and the Head. Staff are reminded of their duties in relation to this declaration through an annual email reminder at the start of each school year. Policies are reviewed by governors annually at the Michaelmas Term meeting of the full board of governors.

Raising Awareness

Mrs Shuna McGregor is the Liaison Governor for Safeguarding; she can be contacted via the School Office. Governors formally consider safeguarding issues once a year, with day-to-day issues being delegated to its curriculum and pastoral sub-committee, the Education Committee, which both the Head and the Designated Safeguarding Leads attend. Concerning its safeguarding responsibilities, the Education Committee is responsible for:

- reviewing the procedures for and the efficiency with which safeguarding duties have been discharged
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- approving amendments to safeguarding arrangements in the light of changing regulations or recommended best practice
- ensuring that safeguarding is an agenda item for each start-of-term staff meeting

Designated Safeguarding Leads

Miss Helen Tomlinson, Head of Boarding, Welfare and Compliance, is the school's principal Designated Safeguarding Lead (DSL), and she is Designated Safeguarding Lead for the whole school, including the Early Years Foundation Stage, responsibilities as set out in her job description. The Designated Safeguarding Lead works closely with the Head and keeps her fully informed about any safeguarding

issues, and she works closely with the Head concerning any referrals or matters needing attention and/or action. Her main responsibility is to maintain an overview of safeguarding within the school, to establish effective channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in the school, in particular the annual review of this *Safeguarding Policy*. The Designated Safeguarding Lead has been fully trained for the demands of this role in safeguarding, inter-agency working and the Prevent Duty. She regularly attends courses with other child support agencies to ensure that she remains conversant with best practice. She undergoes refresher training every two years. She maintains close links with the Local Safeguarding Children Board (LSCB) for Oxfordshire – see below. She reports at least once a year to the Governors' Education Committee on safeguarding issues.

Miss Joanne Croft, Deputy Head, is the school's deputy Designated Safeguarding Lead. She too has received appropriate training in safeguarding, inter-agency working and the Prevent Duty, and she works closely with the Head and Designated Safeguarding Lead to ensure that safeguarding systems are appropriate and effective.

Regular attendance of the Oxfordshire Children Safeguarding Board (OCSB) City Forum for Safeguarding enables the Designated Safeguarding Leads to keep abreast of current local and national issues and relevant training needs.

Through the termly reports to governors of the principal Designated Safeguarding Lead and Head, governors are kept informed of how the school contributes to inter-agency working in line with *Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children*, HM Government, March 2015 (statutory guidance for adults working with children and families) and *KCSiE 2016* through effective implementation of the *Safeguarding Policy* and procedures and good co-operation with local agencies.

The school's records on safeguarding are kept locked in the office of the principal Designated Safeguarding Lead and are kept separate from routine pupil records. Access is restricted to the Designated Safeguarding Leads and the Head.

The school is aware of the importance of differentiating its safeguarding procedures between children who have suffered or are likely to suffer significant harm and those who are in need of additional support from an associated agency. The former will be referred to Children's Social Care immediately; the latter will be referred for inter-agency assessment using local procedures, including the Common Assessment Framework (CAF) and Team Around the Child (TAC) approaches. In the case of a child who has suffered or is likely to suffer significant harm, it is understood that anyone can make a referral and, if a child's situation does not appear to be improving, the staff member with concerns should press for reconsideration, in the knowledge that concerns should always lead to help for the child at some point.

The school is keen to foster and maintain strong relationships with parents. While decisions to seek support for a child in need are usually taken in conjunction with parental agreement, the school recognises that parental consent cannot always be secured for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

Concerning pupil absence, the school recognises its responsibility to inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Local Safeguarding Children Board (LSCB) for Oxfordshire

Contact details for the Oxfordshire LSCB are as follows:

Macclesfield House

New Road

Oxford

OX1 1NA

Telephone: 01865 815449

Alison Beasley, Local Authority Designated Officer (LADO)

Telephone: 01865 815956

Email: alison.beasley@oxfordshire.gov.uk

Beverley Rowson

Telephone: 01865 815554

Email: beverley.rowson@oxfordshire.gov.uk

Assessment Team

Telephone: 01865 323135

Prevent Leads for Oxfordshire include:

Kate Crossan (Oxford City Council)

Email: kcrossan@oxford.gov.uk

Jo Physick (Oxfordshire Prevent Coordinator)

Email: preventreferrals@thamesvalley.pnn.police.uk

Looked-After Children

The school understands its responsibility to ensure that staff have the ability and knowledge to keep safe children who are looked after by a local authority. For a looked-after child, the Designated Safeguarding Lead is the school's appointed member of staff who takes particular responsibility for the child's welfare, contributing to and helping implement care plans for the pupil, liaising with the local authority, and being mindful of parental access arrangements and delegated authority to carers.

Induction and Training

Every new member of staff, including part-timers and temporary, visiting and contract staff, receives appropriate training on their responsibilities in being alert to the signs of abuse and bullying and on the procedures for recording and referring any concerns to the Designated Safeguarding Lead or the Head. Safeguarding training is also given to new governors and volunteers. Everyone attends generalist refresher training at least every three years, this training given by an external provider. Training in safeguarding is an important part of the induction process. As part of their school induction, all adults are issued with *KCSiE 2016, Part 1*, and this document is discussed with each new member of staff individually as well as collectively. The member of staff is required to read it and be sure that the content is understood. Staff are made aware of where and by whom additional support can be accessed. More detail is set out in the policy, *Induction of New Staff, Governors and Volunteers (2)*.

Interaction with Pupils: Code of Conduct for Staff

New members of staff, governors and volunteers are given copies of the school's policy, *Interaction with Pupils: Code of Conduct for Staff (3)*. Discussion of the procedures set out in that document forms a vital part of our induction procedures. The Code of Conduct provides guidance for teachers and other members of staff when faced with handling any issue relating to child abuse. It is not intended

to be a substitute for proper training. Our Designated Safeguarding Lead, who has received specialist training in this topic, should always be informed if a member of staff has any concerns. The Code of Conduct is placed on the agenda of a staff meeting once a year, so that it can be reviewed and updated by staff, before being sent to governors for approval.

Raising Awareness with Pupils

The school prides itself on its culture of open and effective communication between staff and pupils and on its strong pastoral support structures. We prepare all our pupils to make reasoned and informed choices, judgments and decisions. Time is allocated in Personal, Social, Health and Economic Education (PSHEE) and form time for discussion of child abuse and in developing in pupils the confidence which they require to recognise abuse and to stay safe. All pupils know that there are adults to whom they can turn if they are worried, including the Lay Chaplain, the School Nurse, the School Counsellor and the Independent Listener. In particular:

- Pupils have access to a telephone helpline, enabling them to call for support in private.
- Pupils have homework diaries which contain guidance on where to turn for advice, including confidential helplines and web addresses for external specialists, in particular, ChildLine, Kidscape, Get Connected and the Samaritans. The Independent Listener is also listed here.
- Notice boards in the health centre, form rooms and boarding houses display advice on where pupils can seek help.
- We operate a housemother (peer counselling) system, whereby trained older pupils are encouraged to offer advice and support to younger pupils.
- We provide leadership training for the Sixth Form Leadership Team (Patricians and House Captains) which specifically covers the importance of offering support and assistance to younger and to vulnerable pupils.
- Our policy for pupils on confidentiality, *Confidentiality: Pupils (5)* which deals with the issue in more depth is reviewed annually by pupils and staff.

Promotion of Welfare

The ethos of our school is to promote social and moral wellbeing, to teach pupils to take care of and to value themselves, and to think in terms of making a positive contribution to society as adults. All pupils take part in a large number of charitable activities. Many older pupils are involved in helping younger pupils here in our own school and in our local primary schools with reading etc. We see this as making an important contribution towards the development of the whole person, as each pupil grows up to value society and to expect to make a personal contribution towards the common good.

Equal Treatment

Our school is committed to equal treatment for all, regardless of gender, ethnicity, religion or belief, sexual orientation or social background. We aim to create a friendly, caring and supportive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each pupil.

Complaints

We hope that parents and pupils have no complaints, but if they do, they are asked to refer to the *Complaints Procedures for Pupils and Parents* given in the *Parent and Pupil Handbook*. The school will do all that it can to respond to complaints and remedy any deficiency without delay.

Related Safeguarding Policies Required of Schools

- *Induction of New Staff, Governors and Volunteers (2)*
- *Interaction with Pupils: Code of Conduct for Staff (3)*
- *Allegations of Abuse: Staff, Volunteers, Designated Safeguarding Leads, Heads (4)*
- *Confidentiality: Pupils (5)*

- *Use of ICT, Mobile Telephones and Other Electronic Devices (6)*
- *Taking, Storing and Using Images of Children (7)*

See also

- *Safeguarding Contact Numbers, Email Addresses and Websites (8)*

Role of Charity Trustees in Safeguarding

In relation to the requirements of the Charity Commission, Trustees recognise that the principles of risk assessment, mitigation and monitoring are intrinsic to good governance.

Trustees therefore aim to ensure that they have in place procedures for

- assessing safeguarding risks
- creating, maintaining and developing policies and procedures to handle allegations and incidents
- on-going monitoring to ensure effective implementation of the policies and procedures
- making appropriate responses when allegations and incidents arise, and reporting matters as necessary to the police and other agencies
- reviewing the policies and procedures periodically and following serious incidents

To fulfil their responsibilities, Trustees aim to ensure that

- policies and procedures are actively discussed and approved at Trustees' meetings
- terms of reference are firmly set for the on-going review of the policies and procedures
- incidents are analysed not only in isolation but in context so that trends do not go unnoticed
- any Trustee with special responsibility for safeguarding has a clearly defined role
- any suspicion, allegation or incident of abuse or mistreatment of a vulnerable beneficiary will be reported to the Charity Commission, and if there has been no incident, this will be confirmed in the Annual Return to the Charity Commission

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