

## **Safeguarding Policy – January 2017**

Review January 2018

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## 1. Safeguarding Officers

### **The Designated Safeguarding Lead (DSL) in this school is:**

Mr Michael Hartland (Vice Principal)

E: [mh@chasegrammar.com](mailto:mh@chasegrammar.com)

T: 01543 501813

### **The Deputy Designated Safeguarding Lead(s) with responsibility for Senior School is:**

Mrs Moira Simpson (Senior Tutor)

E: [mes@chasegrammar.com](mailto:mes@chasegrammar.com)

T: 01543 501814

### **The Deputy Designated Safeguarding Lead(s) with responsibility for Prep School and EYFS is:**

Mr Ian Sterling (Head of Prep)

E: [is@chasegrammar.com](mailto:is@chasegrammar.com)

T: 01543 501824

### **The Deputy Designated Safeguarding Lead with responsibility for Boarding in this school is:**

Mr Trevor Mayhew (Head of Boarding)

E: [tpm@chasegrammar.com](mailto:tpm@chasegrammar.com)

T: 01543 501819

### **The Nominated Proprietor for Safeguarding is:**

Mrs Tong Zhou (Director)

E: [tong@chasegrammar.com](mailto:tong@chasegrammar.com)

advised by Professor Pat Preedy

### **The Chair of the Advisory Committee is:**

Prof Pat Preedy

E: [professorpreedy@gmail.com](mailto:professorpreedy@gmail.com)

### **The Head of School is:**

Dr Paul Silverwood (Principal)

E: [prs@chasegrammar.com](mailto:prs@chasegrammar.com)

T: 07496 177633

## 2. Further advice on Safeguarding matters

### **First Response Team** (including LADO advice)

T: 0800 1313126

### **Emergency Duty Team** (for out of office hours' referrals for children and vulnerable adults)

T: 0845 6042886

### **Staffordshire Prevent / Counter Terrorism Team**

E: [prevent@staffordshire.pnn.police.uk](mailto:prevent@staffordshire.pnn.police.uk)

T: 01785 238239 or 01785 233109

### **Local Support Team (LST) Cannock East**

T: 01543 512318

**Reporting FGM to local Police** (Mandatory October 2015)  
Wolverhampton Rd, Cannock, Staffordshire WS11 1AW  
T: 0300 123 4455

**Staffordshire County Council** (Education Safeguarding Advice Service)  
E: [esas@staffordshire.gov.uk](mailto:esas@staffordshire.gov.uk)  
W: [Staffordshire Education Safeguarding Advice](#)  
T: 01785 895836

### 3. Policy Review

This policy is reviewed at least annually by the Board of Directors (Proprietors), following scrutiny by the Advisory Committee. This review is minuted, and appropriate changes made and action points agreed. It is published on the school's website. The policy is published on the school website. Printed versions are available from the school office

### 4. Introduction

Chase Grammar School recognises its legal duty under s175 Education Act 2002 (section 157 in relation to independent schools and academies) and the 1989 and 2004 Children Acts. We take seriously our responsibilities to protect and safeguard the interests of all students. This organisation recognises that effective child protection work requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in responding to child protection situations.

These procedures aim to provide a framework which ensures that all our practice in regard to safeguarding children is consistent with the stated values and procedures that underpin all work with children and young people. Statutory guidance defines a child as anyone who has not yet reached their 18<sup>th</sup> birthday.

This Policy has regard to the statutory guidance 'Working Together to Safeguard Children' 2015 and 'Keeping Children Safe in Education' 2016 (KCSIE), 'The Prevent Duty' (2015). The Policy is in keeping with Staffordshire Safeguarding Children Board's (SSCB) policies and procedures and their training strategy and reflects what the SSCB considers to be safe and professional practice. Child protection has to be considered within professionals' wider "safeguarding" responsibilities that include a duty to co-operate under the Children Act 2004 and takes account of the need for children to 'be healthy' and 'stay safe'.

This document also seeks to make the professional responsibilities clear to all staff (teaching and non-teaching, including temporary and supply), governors and volunteers to ensure that statutory and other duties are met. All staff and volunteers must read and be familiar with this Policy, and our internal procedures around referral, including contact details of the Designated Safeguarding Leads (referred to as DSL(s) in subsequent paragraphs). The DSLs will be trained to the appropriate level by Staffordshire LA to include inter-agency working and anti-terrorism (Prevent), and this will be updated every two years.

This Safeguarding Policy and its implementation will be reviewed annually by the Board of Directors (Proprietors).

## **5. Safeguarding and Promoting the Welfare of Children**

The definition for Safeguarding and promoting the welfare of children in Working Together to Safeguard Children 2016 is:

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

## **6. Underpinning values**

Where there is a safeguarding issue, Chase Grammar School will work in accordance with the principles outlined in the Staffordshire Safeguarding Children Board Inter-agency child protection procedures:

- A child's welfare is paramount. Each child has a right to be protected from harm and exploitation and to have their welfare safeguarded;
- Each child is unique. Action taken by child welfare organisations should be child-centred, taking account of a child's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and any special needs;
- Children, parents and other carers will be made aware of their responsibilities and their rights, together with advice about the power of professionals to intervene in their family circumstances;
- Parents will be advised about Chase Grammar School's Safeguarding Policy in the Parent Handbook issued as part of our welcome pack, on the school website and for Year 7 students on admission to the Chase Grammar School. A copy of this policy is available on the school website; ([www.chasegrammar.com](http://www.chasegrammar.com))
- Individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children's welfare. However, it may not be appropriate to advise parents/carers immediately about a referral depending on circumstances and the advice given by Children's Social Care. The welfare of the child is paramount in such situations;
- Each child has a right to be consulted about actions taken by others on his/her behalf in an age appropriate way. The concerns of children and their families will be listened to and due consideration given to their understanding, wishes and feelings. However, it may not always be possible to respect a child/carer's request for confidentiality. If a child may be at risk of significant harm, there is a duty on Chase Grammar School to share information with Children's Social Care. This will be explained to the child or family member and appropriate reassurance given;
- Personal information is usually confidential. It should only be shared with the permission of the individual concerned (and/or those with parental responsibility) unless the disclosure of confidential personal information is necessary in order to protect a child or promote their welfare (see also section on confidentiality below). In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict "need to know" basis;

- Professionals must be aware of the effects of outside intervention upon children, upon family life and the impact and implications of what they say and do;
- Explanations by professionals to children, their families and other carers will be plainly stated and jargon-free. Unavoidable technical and professional terminology will be explained in simple terms;
- Sound professional practice is based upon positive inter-agency collaboration, evidence-based research and effective supervision and evaluation;
- Providing early support is an important principle of practice in inter-agency arrangements for safeguarding the welfare of children and enshrined in legislation and statutory guidance. (Children's Act 2004, Working Together to Safeguard Children 2015, Keeping Children Safe in Education 2015)

## **7. Thresholds for Intervention**

### **7.1. Early Support: Early Help Assessment**

Practitioners must complete an Early Help Assessment (EHA), available from DSL or Deputy DSLs, when:

- Age appropriate progress is not being made and the causes are unclear or;
- The support of more than one additional agency is needed to meet the child or young person's needs.

All staff receive EHA awareness training at Chase Grammar School and the Principal will ensure staff are familiar with EHA processes. Staff must discuss children who appear to have additional needs with the Principal or DSLs, they in turn will speak with the child and parents. The school must obtain parental/student consent for an EHA to be completed. Older children may give consent for their own EHA.

Chase Grammar School's DSL/EHA lead may need to make a referral directly to other agencies, or request the support of Staffordshire County Council Local Support Team (LST). Staff will follow the guidance of the SSCB Threshold Document - accessing the right help at the right time ([www.staffsscb.org.uk](http://www.staffsscb.org.uk) – procedure 1E). Chase Grammar School will inform the LST Co-ordinator when an EHA is started, and when it is closed, irrespective of whether or not there is an LST worker involved with the family.

## **7.2. Child in Need - S17 of the Children Act 1989:**

A 'Child in Need' referral should be considered where the needs of the child are unlikely to be met under an EHA, such as a child with complex disabilities, when a social work led assessment is required.

Section 17 of the Children Act says that an assessment for services should be undertaken by the Local Authority in the following circumstances:

- Child(ren) are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority;
- Their health or development is likely to be impaired, or further impaired without the provision of such services;
- They are disabled.

If the DSL considers that the welfare concerns indicate that a 'Child in Need' referral is appropriate, he/she will speak with parents/young person and obtain their consent for referral to the First Response Team (FRT) or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss the issues with the FRT.

Appropriate Chase Grammar School staff should be invited to participate in Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require section 17 services.

Some children in 'acute need' (see SSCB Threshold guidance) may require Child in Need. This could include children who self-harm or disclose an intent to commit suicide (SSCB procedure 4U).

## **7.3. Child Protection (S47 Children Act 1989)**

S47 of the Children Act 1989 says the Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others. Staff from this organisation do not investigate whether a child has been abused. This is the duty of social workers from the safeguarding team and the police. Education staff refer reasonable concerns which indicate that a child may be at risk of significant harm.

It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under S.47 must therefore provide information which clearly outlines the likelihood that a child is suffering or likely to suffer significant harm. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development.

In order to understand and evidence 'significant harm', it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development.

If staff have significant concerns about any child, they must make them known to the Designated or Deputy DSLs without delay in accordance with reporting and recording procedures through the school's 'Expression of concern form'.

## 8. Types of Abuse and Neglect

Teachers should be particularly mindful of the particular vulnerability of children with special educational needs and/or disabilities. Types of abuse and neglect include concerns such as children missing education, female genital mutilation (FGM), child sexual exploitation, radicalisation, so-called honour-based violence and forced marriage.

The following definitions are taken from Keeping Children Safe in Education (KCSIE), September 2016:

- 8.1. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.
- 8.2. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 8.3. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 8.4. **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.
- 8.5. **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of



inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.<sup>1</sup>

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<sup>1</sup> See KCSIE 2016, p.11-12

## **9. Concerns about children who abuse other children**

Abuse is not always due to the actions of adults. Sometimes children abuse other children. Emotional abuse may involve serious bullying, including isolating a particular child, derogatory name calling and/or making threats, including “banter”, and may include online bullying through sexting, social networks, online games or mobile phones. Bullying behaviour can include physical assault and gender-based issues. Children may also sexually abuse and exploit other children.

Chase Grammar School works with children, parents and staff to create to an ethos of mutual respect and will robustly address concerns that children are suffering abuse due to the behaviour of other students. Students are encouraged to talk to staff if they have worries and concerns, and there are processes where they can report any problems confidentially and anonymously (in boarding we have an Independent Listener). Parents and carers are also encouraged to talk to staff if they have concerns, and should refer the matter to the DSLs in the setting if they feel that the matter is not being addressed or the situation is not improving. Chase Grammar School will follow our Counter-Bullying Policy when this is appropriate to the circumstances, and follow the Behaviour and Discipline Policy should sanctions be necessary.

If the concerns are in respect to an allegation of a criminal nature, the school may share information with the police without reference to the parents, carers or the children e.g. physical assault, sexual assault, sexting (see e-safety section of policy below). In regards to allegations or concerns that a child has demonstrated harmful sexual behaviour, we will follow the SSCB procedure in this regard (procedure 4i) and also share information about the child or children involved with children’s social care. In order to protect all children at the school, we may need to impose disciplinary sanctions in regards to a child who has harmed, or may pose a risk to, another child, or implement risk management procedures which may restrict movement of the child in our setting, or restrict activities.

If there are concerns that a child attending this school may have been seriously harmed, or at risk, due to the actions of children within the community, but not attending the school, we will share information appropriately with other agencies to safeguard and promote their welfare.

Children involved as perpetrators will be considered “at risk”, as well as children who are victims.

## **10. Making referrals**

Where a child is registered at Chase Grammar School, consultation must take place with the DSLs who will be the most appropriate people to initiate any referral without delay. A written record of concerns must be made using the school’s Expression of Concern Form, signed, and passed to the relevant DSL, who then can make a referral to the First Response Team or the child’s existing social worker. If the child lives in an authority outside of Staffordshire, the matter will be referred by the DSL to the relevant Children’s Social Care team in that area, although Staffordshire retains the duty to assist the school in an emergency.

As per statutory government guidance ‘Keeping Children Safe in Education’ September 2016, anybody can make a referral. However, due to the role of the DSLs these member of staff may be party to additional and pertinent information and therefore are best placed to refer on. If it is not possible to speak to the Designated or Deputy DSL, or there would be an unwarranted delay by doing so, the member of staff should contact the First Response Team to discuss concerns. In these circumstances, the DSL must be informed about the referral as soon as possible.

For referral to First Response phone 0800 1313126. The phone call will be followed up with written confirmation on the Multi-agency referral form (MARF) within 48 hours. The multi-agency form is available from the SSCB website (procedure 3B): [www.staffsscb.org.uk](http://www.staffsscb.org.uk)

## 11. Confidentiality

Confidentiality is an issue that needs to be understood by all those working with children, particularly in the context of safeguarding children and child protection. This is a complex area and involves consideration of a number of pieces of legislation.

You can never guarantee confidentiality to a child as some kinds of information may need to be shared with others. A suggested form of words that may help when talking to children is as follows: *"I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."*

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts. However, any disclosure of personal information to others, including children's social care departments, must always have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998, European Convention on Human Rights, Article 8). However, the welfare of the child is paramount (The Children Act 1989) and there may be reasons for not sharing the concerns with the child, their parents or carers prior to making a referral to children's social care.

Information may also be shared without consent in order to prevent or detect a crime, prevent serious harm to a child or adult, or due to a public interest concern. Chase Grammar School follow the information sharing guidance provided by the government and the SSCB in considering the sharing of personal information when there are safeguarding concerns.

The law also requires the disclosure of confidential information necessary to safeguard a child or children. Under Section 47 of the Children Act 1989 statutory agencies have a duty to co-operate with the Local Authority if a child may be at risk of significant harm. Therefore, if the Police or Children's Social Care are conducting a Section 47 investigation under the 1989 Children Act, staff must share requested information relevant to the investigation. Legal advice should be sought if in doubt from the County Legal Services Department or from the ISA.

When children transfer to a new school or college at any time other than key transition points (e.g. move to primary or high school), it may be necessary to inform other partners.

## 12. Talking to and listening to children

If a child chooses to disclose, you **MUST**:

- be accessible and receptive;
- listen carefully and uncritically at the child's pace;
- take what is said seriously;
- reassure the child that they are right to tell;

- tell the child that you must pass this information on;
- make a careful record of what was said.

You must **NEVER**:

- take photographs of injuries;
- examine marks/ injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid);
- investigate or probe, aiming to prove or disprove possible abuse – never ask leading questions;
- make promises to children about confidentiality or keeping ‘secrets’;
- assume that someone else will take the necessary action;
- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or child) allegedly involved;
- offer opinions about what is being said or about people allegedly involved;
- forget to record what you have been told;
- fail to pass the information on to the correct person;
- ask a child to sign a written copy of the disclosure or a ‘statement’.

In regard to young children and children with communication difficulties or those who use alternative/augmented communication systems, staff may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

### **13. Record keeping**

Well-kept records are essential in situations where it is suspected or believed that a child may be at risk from harm. Records should:

- state who was present, time, date and place;
- use the child’s words wherever possible;
- be factual/state exactly what was said;
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation;
- be written in ink and signed by the recorder.

Records about child protection or pertaining to welfare concerns or issues, including EHA paperwork, will be retained securely and separately to the curriculum records of the child in the Principal’s Study with access restricted to the Principal and DSL. If the child moves to another school or education setting, these records will be suitably redacted in regard to the identification of other children or adults and sent in a timely and secure manner to the DSL of the receiving school or college. Child protection records are never destroyed.

### **14. Attendance at Child Protection Conferences**

The DSL or their deputy are required to attend the initial Child Protection Conference and Reviews, and provide a written report. Parents should be informed of what is in the report as there should be no surprises about the information shared at a Child Protection Conference.

If a child is made subject to a Child Protection Plan, it may be more relevant for the class teacher or head of year to attend the subsequent core group meetings and they will be given appropriate support around safeguarding issues by the DSL.

## **15. Safer Recruitment**

When recruiting new members of staff, Chase Grammar School follows the government guidance 'Keeping Children Safe in Education' 2016 and safer recruitment principles, and has due regard to the Safeguarding Vulnerable Groups Act 2006 and The Protection of Freedoms Act 2012 and the Education (Independent School Standards) Regulations 2014, also known as the registration standards or Independent School Standards Regulations (ISSRs). This includes all new staff in all roles including those who work directly with children in the EYFS. Chase Grammar School has separate written recruitment and selection procedures in place (requirement of KCSIE 2015) and ensures that enhanced DBS checks are undertaken in line with government guidance, that appropriate references are obtained and that qualifications are verified. In accordance with regulations and 'Keeping Children Safe in Education' 2015, the school retain a 'single central register' (SCR) of when the appropriate checks are undertaken in regard to relevant staff. All staff read and sign 'Disqualification under the Childcare Act 2006' (February 2015).

Additional checks are carried out where required, including Prohibition from Teaching checks, and Prohibition from Management checks.

Safer recruitment training has been undertaken by senior members of staff in accordance with guidance and best practice principles.

The DfE has arranged a new facility whereby schools in England can use Employer Access (EA) Online to find out whether an individual is subject to a prohibition or other restriction on teaching imposed by another country in the European Economic Area. This facility became available from 18 January 2016. More detailed information is set out below. Keeping Children Safe in Education will be updated to reflect the new functionality in due course and at that time the new check will become a requirement.

### **Implementation of EU Directive 2005/36/E**

From 18 January where any European Economic Area (EEA) authority that has responsibility for regulating the teaching profession imposes a restriction on a person's ability to work as a teacher, this information must be shared with all other EEA teacher regulators. In addition to the normal teacher prohibition pre-appointment checks detailed at part 3 of Keeping Children Safe in Education' statutory guidance, schools can now use the Employer Access (EA) Online Service to also identify restrictions imposed by all EEA authorities. Restrictions imposed by another EEA authority do not prevent an individual from taking up teaching positions in England. However, schools should consider the circumstances leading to the restriction when considering a candidate's suitability. The EA Online service explains how to get additional information about EEA restrictions.

Chase Grammar School will implement this EA as part of the Recruitment process.

## **16. Induction and Training**

As part of their induction, all staff must read:

- Part 1 and Annex A of 'Keeping Children Safe in Education' 2016

- The school's Child Protection Policy, including all annexes

Additionally, all existing staff have completed an induction into internal safeguarding procedures. All new staff also complete this induction process, which is overseen by the DSL, and completion recorded by HR.

Newly appointed staff, temporary staff and volunteers have a robust induction into the safeguarding procedures when they join Chase Grammar School. They will be made aware of the Staffordshire Safeguarding Children Board procedures ([www.staffsscb.org.uk](http://www.staffsscb.org.uk)) as part of that induction programme, and read Part One of 'Keeping Children Safe in Education' 2016, the school's safeguarding policy and the staff code of conduct. Staff will also carry out appropriate child protection training in accordance with the SSCB training strategy, within six months of joining Chase Grammar School. The Safeguarding training given to each member of the organisation will be updated and refreshed at least annually and often more frequently (e.g. online safety "Tip on Tuesday" in January 2017). Induction also includes how to identify children and young people at risk, prevention of radicalisation, whistle blowing and the school's behaviour and counter-bullying policies. HR retains records of all child protection and safeguarding training accessed by staff and volunteers.

The DSLs will attend Staffordshire Safeguarding Board Courses at Level Two and above at least every two years in order to maintain continuous professional development and comply with statutory guidance and the SSCB training strategy. The DSL will cascade relevant safeguarding information and training to staff, in the school and proprietors and Advisory Board members, enabling relevant staff, proprietors and Advisory Board members to attend specific training events.

## **17. Professional support**

Chase Grammar School recognises the importance of professional reflective support for staff when working with vulnerable children, particularly in relation to child protection cases. Arrangements are in place for the Designated Safeguarding Leads to have regular and scheduled professional support. The Designated Safeguarding Leads offer appropriate support to other staff within Chase Grammar School according to need or at their request.

## **18. Providing a safe working culture**

Chase Grammar School has implemented a staff Code of Conduct which applies to all permanent and temporary staff, and adult volunteers working in this organisation. Staff and volunteers are in a position of trust. All staff and volunteers must seek to minimise the risk of any situation arising in which children are put at risk, or misunderstandings about their behaviours towards children can occur or be perceived. Staff and volunteers must adhere to the code of conduct and follow the safer working practice guidance given by this organisation. Our code of conduct includes expectations about staff behaviours including outside of the working environment, staff/student relationships and communications including the use of social media. Any reason for staff to be having personal, social contact with students at the school must be explained to the Principal with the rationale and any safeguarding actions required will be recorded.

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a student or student, even when the student/student is over the age of consent but under 18 years of age.

Staff are advised to use the following sensible precautions when working alone with children:

- avoid working in isolation with children unless thought has been given to safeguards;
- work in a room where there is a glass panel in the door or leave the door open;
- make sure that other adults visit the room occasionally;
- do not give students lifts home in your car

Any use of physical force or restraint involving students/students will be carried out and documented in accordance with the relevant physical intervention policy (see Policy to promote good behaviour and to set out the sanctions for misbehaviour). If it is necessary to use physical intervention (for example to prevent the child hurting themselves or others), parents will be informed. Children who attend our setting will not be punished by any form of hitting, slapping, shaking or other degrading treatment, including verbal abuse.

The proprietors at Chase Grammar School recognise their responsibility to remain vigilant and ensure that all staff and volunteers are, and remain, suitable to work with children.

Chase Grammar School complies with the requirements of the Child Care Act 2006 and Childcare (Disqualification) Regulations 2009. Therefore, adults who work in, or manage, our early years setting are required to inform the Principal if they have, or during the course of their employment, are convicted for a relevant offence which disqualifies them from working with children. They must also inform the Principal if they live in the same household as a person who is, or becomes, disqualified because they have committed a relevant offence against a child or adult. In such cases the school will seek advice from ISI as the worker is required to seek a waiver from Ofsted to allow him or her to continue to work with this cohort of children. Whilst the application for a waiver is being considered by Ofsted, the school will take appropriate measures in regards to staffing, which may include re-deployment or suspension.

(In addition, irrespective of the age group worked with), any staff member, volunteer, proprietor, or adviser who becomes the subject of a police investigation in relation to physical or sexual offences against adults or children, or are charged with such a criminal offence, must inform the Principal. Staff must disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children whether received before, or during, their employment at the school. (This would not include 'spent' convictions under the Rehabilitation of Offenders Act). The Principal will discuss any potential safeguarding matters with the Local Authority Designated Officer (LADO) and any required action will be agreed.

Any staff member, volunteer or governor whose own children become subject to child protection investigations must inform the Principal. The Principal will discuss with the LADO in accordance with SSCB procedures for dealing with allegations against adults who work in a position of trust with children (SSCB procedure 4a). Appropriate action will be agreed. In case of serious harm, the police should be informed from the outset.

Staff have a professional duty to report concerns about the conduct of other adults working in Chase Grammar School if there are indications that a child or children could be at risk of harm. Adults working in this school are encouraged to raise any concerns about conduct or practice so that this can be addressed appropriately. Allegations of abuse made against adults working in the school, whether historical or current, should be reported to the Principal (or, if the allegation is against the Principal, it should be reported to the Chair of the Advisory Board Finance and Government Committee in their absence this will default to the Proprietor body Chase Grammar School Limited whose representative is one of the Directors Tong Zhou.). Adults working in the school are also able to follow the 'Whistle Blowing Policy' if they feel unable to follow standard procedures relating to an allegation against staff.

Staff raising genuine concerns, even if, on investigation, these concerns are not substantiated, will be supported by the senior leadership team, and their employment protected.

Staff who fail to follow Chase Grammar School's policies and procedures for safeguarding and promoting the welfare of children may be subject to disciplinary procedures.

#### **19. Allegations of abuse against a person working in a position of trust (staff, volunteers, DSL & Principal)**

Staff should normally raise their concerns with a designated manager under the organisations standard procedures for dealing with allegations about a person in a position of trust (this is Chase Grammar School's Principal, Dr Paul Silverwood, [prs@chasegrammar.com](mailto:prs@chasegrammar.com) 07496 177633). If the Designated Person is the subject of concern the matter should be referred to one of the DSLs. If this is not possible, the Whistle Blowing Policy can be implemented. Under standard procedures, if there are concerns that an adult working with children may have abused a child, or be unsuitable to work with children and young people, concerns will be passed to the Local Authority Designated Officer (LADO) by the Principal or DSL if allegation is about the Principal. First Response Team – including LADO advice – 0800 1313126. All allegations should be referred to the LADO for advice before any investigation takes place and within one working day. In borderline cases, these discussions can be held informally and without naming the individual. In case of serious harm, the police will be informed from the outset. The DSL will inform the Proprietor of any allegations against the Principal – this contact will be made without the Principal being informed. The proprietor will contact the LADO without delay.

Children can be the victims of abuse by those who work with them in any setting. All allegations of abuse of children in relation to any staff member or volunteer are therefore taken seriously.

In line with government guidance and SSCB procedures, the Principal/Proprietor will contact a Local Authority Designated Officer (LADO) to discuss the allegation if the concerns are that an adult in a position of trust has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children (*Keeping Children Safe in Education 2016*).

This initial discussion will establish the validity of any allegation under SSCB procedures ([www.staffsscb.org.uk](http://www.staffsscb.org.uk) procedure 4A) and if child protection enquiries may be required due to a child having possibly suffered, or being at risk of suffering, 'significant harm'. If this is the case a referral will be raised with the relevant social care safeguarding team and a section 47 child protection strategy meeting will be convened that the Principal/Chair of Governors will attend.

The fact that a member of staff offers to resign will not prevent the allegation procedure and any necessary disciplinary action reaching a conclusion.

The decision of the strategy/joint evaluation meeting could be:

- investigation by children's social care;
- police investigation if there is a criminal element to the allegation;
- single agency investigation completed by the school which should involve the Senior HR advisor for the School.



In cases where an employee or volunteer is suspended during an investigation, the Principal will:

- Recognise that suspension of an employee /volunteer in such circumstance must not be construed as a disciplinary penalty. (In consequence a suspended member of staff will be in receipt of full pay and benefits. Voluntary alternatives to suspension - e.g. paid leave of absence - may be considered by the Principal;
- Consider placing a suspended employee normally resident in the Boarding school accommodation in temporary accommodation off-site (provided at the school's expense) whilst investigation is pending of a child protection nature, student relationship and potential for peer abuse.
- Interview the employee/volunteer. An employee will be entitled to bring a trade union representative (or a friend) to the interview. At the interview, the employee or volunteer will be informed of the allegation laid against them and provided with all possible information not prejudicial to the conduct of the investigation;
- Send the suspended employee/volunteer written notification of the reasons for suspension within 24 hours of the oral interview. In this written notification the employee/volunteer will be provided with the name of a member of the SLT who will act as an information channel, keeping them abreast of the progress of the investigation;
- Inform the Proprietor Tong Zhou (advised by Professor Pat Preedy);
- Cases will be resolved as quickly as possible. All allegations will be investigated as a priority to avoid delay. If a disciplinary hearing is required and can be held without further investigation, the hearing will be within 15 working days.
- Inform the student who has made an allegation (and his/her parents) that the accused employee/ volunteer has been suspended.
- Where it is decided that a suspended person can return to work, the Principal and Proprietor will consider how best to facilitate his or her return.

If the matter does not meet the threshold for intervention by other agencies, but concerns remain about the conduct of a person in position of trust working with children, Chase Grammar School will undertake investigatory and, if appropriate, disciplinary action.

## **20. Identifying cases of female genital mutilation (FGM) and Forced Marriage**

Any indications that Female Genital Mutilation (FGM) or Forced Marriage are imminent, or have already taken place, will be dealt with under the child protection procedures outlined in this policy. In support of this provision, we will do everything that we can to ensure that:

- Chase Grammar School is an 'open environment', where students feel able to discuss issues that they may be facing;
- the Designated Safeguarding Leads have a thorough understanding of the issues surrounding FGM and Forced Marriage and access relevant training;
- advice and signposting is available for accessing additional help, e.g. the NSPCC's helpline, ChildLine services, Forced Marriage Unit;
- awareness raising about FGM is incorporated in the safeguarding training so that all staff and volunteers are able to identify indicators.

If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

- to alert the DSL to their concerns. This member of staff will then refer concerns to children's social care, who will inform the police if they need assistance. If a student has

- disclosed that they are at risk in this way, the case will still be referred to social care even if it is against the student's wishes;
- not to consult or discuss with the student's parents or family, or others within the community.

See end of Policy for local Police contact details.

## **21. Online Safety - See Annex E**

## **22. Child Sexual Exploitation (CSE)**

Sexual exploitation of children involves situations where young people receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common.

Children do not become entrenched in CSE without first being subjected to targeted grooming or opportunistic abuse. Systemic sexual abuse is the final stage in a process. Chase Grammar School recognises that students may be targeted for sexual exploitation, and staff will be vigilant for the indicators and report concerns to the DSL. All staff receive awareness training about CSE. The DSL is conversant with the SSCB procedure (4H) and will share information with parents and carers, and the police and social care in appropriate circumstances. We will work with other agencies on plans to protect children who are deemed to be at risk of exploitation.

Chase Grammar School believes that children need to understand how perpetrators groom children for exploitation. We will use appropriate resources in a sensitive and responsible way to educate young people about grooming behaviours, the risk of being drawn into exploitation, possible consequences, and ways of protecting themselves from the risk of sexual exploitation.

## **23. Preventing Extremism and Radicalisation (The Prevent Duty June 2015)**

As part of our safeguarding ethos we encourage students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the students; reasonably practicable steps have been taken to offer a balanced presentation of opposing views to students. We also have a duty under the Counter Terrorism Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in line with our Behaviour and Discipline Policy for students or the Staff Code of Conduct. We will share information with the First Response Team and/ or the Staffordshire police Prevent team when appropriate. We will also work with Staffordshire's Channel Panel in relevant circumstances. Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn

into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned.

Key staff will receive awareness raising and training in regard to preventing extremism and radicalisation in Staff Training set for September 2016.

## **24. Resources**

Section 157 of the Education Act 2002 puts an explicit duty on Governing Bodies (proprietor) to ensure their functions are exercised with a view to safeguarding and promoting the welfare of students. The Advisory Board will therefore ensure that sufficient resources are made available to enable the necessary tasks to be carried out properly under Staffordshire Safeguarding Children Board procedures including attending meetings, collating and writing assessment reports, and staff training. The Advisory Board will also ensure that all members of the Board have an understanding of safeguarding issues and the policies and procedures that are in place in school to safeguard and promote the welfare of all students in the school. Safeguarding awareness will be addressed through the curriculum as appropriate to ensure all the students understand what is meant by safeguarding and how they can be safe.

### **Key documents referred to and underpinning this policy are:**

- Keeping Children Safe in Education 2016 (DfE)  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working Together to Safeguard Children 2015 (DfE)  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children>
- Staffordshire Safeguarding Children Board Procedures (online)  
[www.staffsscb.org.uk/professionals/procedures//](http://www.staffsscb.org.uk/professionals/procedures//)
- Staffordshire Safeguarding Children Board Training Catalogue (online)  
[www.staffsscb.org.uk/professionals/Inter-Agencytraining/events/](http://www.staffsscb.org.uk/professionals/Inter-Agencytraining/events/)
- Keeping Children Safe in Education April 2015 (DfE)  
[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/300309/KCSI\\_E\\_gdnce\\_FINAL.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300309/KCSI_E_gdnce_FINAL.pdf)
- Disqualification under the Child Care Act 2006  
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>
- Information Sharing Advice for practitioners providing safeguarding services HM Gov. 2015  
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- Staffordshire Policy and guidance on the use of Restrictive Physical Interventions (including restraint) in mainstream schools
- The Children Act 1989 and 2004
- The Education Act 2002
- What to do if you're worried a child is being abused – March 2015 - advice for practitioners (HM Gov.)  
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused>
- Section 6L Staffordshire and Stoke on Trent LSCB and SSASPB Prevent Channel Guidance June 2015
- CGS Policy: Whistle Blowing

- Staffordshire e-safety Tool Kit
- Staffordshire Entrust Guidance 'Early Years Mobile Phone and Camera toolkit' (when applicable to setting - [Staffordshire Education Safeguarding Advice](#) – Policies and procedures tab)

**Annex A: Welfare and Safeguarding: Chase Grammar School Annual Audit by the Proprietors in liaison with the Principal, DSL and a member of the Advisory Committee.**

<b>Policy Check</b>	<b>Add notes or mark as met</b>
Does the policy include all the required elements as per the ISI Regulatory Handbook/KSIE/legislation?	

<b>1</b>	<b>Strategic leadership Incorporates Welfare &amp; Safeguarding</b>	<b>Evidence of compliance</b>
1.1	The organisation provides strategic leadership re welfare and safeguarding. W&S is included within self-evaluation, the SDP and performance management.	
1.2	The Directors and Advisory Board provide leadership and support.	
1.3	There is a policy and process for responding to complaints, incidents and concerns. The policy is published on the school's website.	

<b>2</b>	<b>Designated senior person for child protection/safeguarding</b>	<b>Evidence of compliance</b>
2.1	<p>There is a named Designated Safeguarding Lead (DSL) with 'status and authority'.</p> <p>There is a named deputy designated person with status and authority.</p> <p>There is a designated practitioner to take lead responsibility for safeguarding children in the EYFS.</p> <p>Staff and the school community know who these people are.</p>	
2.2	Has the DSL/deputy have been trained at an advanced level <b>to ensure understanding of multi-agency work</b> within the last 2 years?	
2.3	Has the Safeguarding Advisor for the Local Authority been notified if the Designated Person has changed?	
2.4	Does the DSL understand s/he must pass immediately to the Principal any allegations against staff?	
2.5	Does s/he understand s/he must pass immediately to the proprietor/director	

	any allegation against the Head?	
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3	Information for staff	Evidence of compliance
3.1	Does the school liaise regularly with local safeguarding agency and immediately whenever a disclosure or allegation is made?	
3.2	Are safe recruitment procedures implemented as per the policy?	
3.3	Is there a system for staff and other adults in the school to learn about child safeguarding and the school's child safeguarding procedures?	
3.4	Have all teaching and support staff been trained in <b>Basic Awareness of Child Protection</b> within the last three years?	
3.5	Is there a record of all W&S training undertaken? Is this reported to Governors?	
3.6	Is there a handout for supply staff and volunteers which outlines the discipline and child safeguarding procedures?	
3.7	Does the induction programme for all staff include the welfare and safeguarding policy/child protection procedures; staff code of conduct; whistle-blowing policy; radicalization/Prevent, identity of the DSL and a copy of Part 1 of KSIE?	
3.8	Does the safeguarding policy and induction/training also reference the Behaviour Policy, Anti-bullying Policy, Physical Intervention Policy, First Aid and H&S policies?	

4	Student Support	Evidence of compliance
4.1	Is the ethos of the school one in which children and young people are always valued, respected, listened to and taken seriously?	
4.2	Do staff create and use opportunities to encourage children and young people to communicate about issues that concern them?	
4.3	Is appropriate support available to children and young people, including any who are at particular risk or who have disclosed abuse?	

4.4	Do students who may be concerned about abuse know how to access support for themselves or for their friends?	
4.5	Where relevant, are appropriate measures in place to safeguard children and young people during work experience, work based learning or educational visits?	
4.6	Is there an e-safety policy? Is there appropriate support for and awareness of children and young people, who may be at risk in their use of the internet including radicalisation? Do all children know how to report concerns via CEOP?	

<b>5</b>	<b>Record keeping</b>	<b>Evidence of compliance</b>
5.1	Is there an established system for recording confidential child safeguarding information?	
5.2	Are these child safeguarding records kept securely and separately from the students' personal files?	
5.3	Are all staff fully aware that they may from time to time be required to monitor particular students with regard to child safeguarding concerns?	
5.4	Are all staff fully aware that all records should be kept bearing in the mind that they may become evidence if they are safeguarding concerns?	
5.5	Does the school's system ensure that confidential safeguarding information on a student is transferred when the student moves to or from another school?	

<b>6</b>	<b>Information to Parents</b>	<b>Evidence of compliance</b>
6.1	Does the school include in the prospectus, information for parents about the school's role in child safeguarding? Is the W&S/Child Protection policy on the school website?	
6.2	Does the school have a system to inform parents of support available within the community?	

<b>7</b>	<b>Curriculum</b>	<b>Evidence of compliance</b>
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7.1	Does the school promote child protection and the safeguarding of children through the curriculum: (i.e. personal safety, keep safe, self-esteem, anti-bullying, sex and relationships, access to the internet)?	
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8	Common Assessment Framework	Evidence of compliance
8.1	Do you know who within the school co-ordinates Common Assessments (use of the CAF)?	
8.2	Is that person aware of the procedures and protocols for use of the CAF?	
8.3	Has that person undertaken training in the use of the CAF?	

9	Recruitment & Selection of Staff	Evidence of compliance
9.1	Are senior staff and governors aware of the procedures the school must follow for safer recruitment and selection of staff and volunteers? Staff contracts and job descriptions include a clause regarding safeguarding children.	
9.2	Have the Headteacher, proprietor & sufficient senior staff been trained in <b>Safer Recruitment</b> within the last five years?	
9.3	Do senior staff and governors understand the processes of DBS and barred list check & how to interpret the response?	
9.4	Is the single central register accurate and reflective of safer recruitment?	

10	Allegations against staff & a Code of Conduct	Evidence of compliance
10.1	Are senior staff/proprietors aware of the procedures the school must follow when an allegation of abuse has been made against the head, a member of school staff or a volunteer?	
10.2	Have senior staff and proprietors undertaken any training regarding allegations against staff?	
10.3	Do senior staff and proprietors have an understanding of the statutory guidance on 1) Behaviour & Discipline in Schools, 2) Preventing and tackling Bullying, 3) Use of Reasonable Force,	



	4) Screening, Searching and Confiscation?	
10.4	Is the Head aware of the importance of contacting the Local Authority Designated Officer (LADO) in the event of any allegation being made?	
10.5	Is the proprietor aware of the importance of contacting the LADO in the event of any allegation against the Head?	
10.6	Are you satisfied with the school's arrangement to reduce the likelihood of allegations, e.g. a policy and training on physical intervention, and a Code of Conduct that explains boundaries of professional behaviour?	
10.7	Are all staff aware of their duty of care and their responsibility to prevent and tackle bullying in line with statutory guidance?	
10.8	Have all teaching and support staff been provided with appropriate training to prevent and tackle bullying?	

<b>11</b>	<b>Proprietor Responsibilities</b>	<b>Evidence of compliance</b>
11.1	Does the designated person make an annual report to the proprietors covering changes to policy & procedures, training undertaken by the designated senior person, other staff & proprietors/advisers, the number of cases (without names or details) and the place of child safeguarding issues in the curriculum?	
11.2	Have all proprietors/members of the Advisory Board been provided with appropriate child safeguarding training?	
11.3	Has the proprietor been trained in Safer Recruitment techniques?	
11.4	Has a proprietor/adviser been nominated for liaison, to monitor and support the work of the DSL?	
11.5	Is the proprietor aware of his/her responsibility to manage any allegation against the Head and received appropriate training?	
11.6	Are proprietors aware of their	

	responsibilities relating to extended provision or other activities taking place on school premises, outside normal school hours?	
11.7	Do proprietors understand that they have no right of access to information involving any child protection cases within school?	
11.9	Do proprietors check that child safeguarding arrangements are adequate and the deficiencies or weaknesses are remedied without delay?	

12	Links with other agencies	Evidence of compliance
12.1	Is the school pro-active in establishing positive links with other relevant agencies, particularly Education Welfare, Educational Psychology, Social Care, Police and Health?	
12.2	Any other significant points to review	

<p>Reviewed by:</p> <p>_____</p> <p>(Designated Senior Lead – Safeguarding)</p> <p>Reviewed by:</p> <p>_____</p> <p>(Proprietor)</p> <p>Review date:</p> <p>_____</p>	<p>Date report presented to Board:</p> <p>_____</p> <p>(see Minutes)</p> <p>Next Review due:</p> <p>_____</p> <p>(within twelve months)</p>
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## **Annex B: Job Description for Designated Safeguarding Lead (DSL)**

### **Introduction**

The role of the DSL in educational settings is set out in the following reference documents:

- Working Together to Safeguard Children 2015
- Keeping children safe in Education (DFE) March 2015
- Disqualification under the Childcare Act 2006

Section 175 (Section 157 for Independent Schools and Academies) places an explicit duty on Governing bodies/Advisory Committee or proprietors to ensure that policies and procedures in schools and colleges regarding safeguarding and promoting the welfare of children are effective. The legislation is supported by DFE statutory guidance ‘working together to safeguard children 2015’ and ‘keeping children safe in education’ (KCSE) 2015. The guidance states that all schools and colleges should have a designated safeguarding lead who ‘should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff’. This member of staff should be a member of the **leadership team**.

This role may be referred to as the DSL (Designated Safeguarding Lead). There should also be at least one Deputy Designated Safeguarding Lead who is appropriately trained (Level 2, SSCB). The Deputy does not have to be a member of the leadership team.

The Designated Safeguarding Lead is not expected to be an expert but is expected to take **local** responsibility for:

- (a) Policy
- (b) Practice
- (c) Procedures
- (d) Professional Development

#### **(a) Policy**

Although it is the Proprietor and Advisory Committee’s responsibility to ensure that Chase Grammar School has a current Safeguarding Children policy, the designated Safeguarding Lead should ensure that the senior management/leadership team is aware of its significance. This must be reviewed by the full Advisory Committee on an annual basis. If the Policy is drawn up or amended locally, it should cover circumstances where child protection issues may arise and include:

- responsibility of the Proprietor and Advisory Committee to ensure that procedures to safeguard and promote children’s welfare are effective and appropriately resourced.
- casework and referral issues
- the distinction between “children in need” and “children in need of protection”
- reference to local procedures (LST and SSCB)
- the boundaries of prior consultation with parents
- confidentiality
- child safety and the setting’s “duty of care”, including where children are off the school premises but under the school’s supervision (e.g. trips, swimming etc.)

- prohibition of corporal punishment
- the setting's use of physical intervention
- the recruitment and supervision of staff, volunteers and helpers
- allegations against staff procedures including reference to Whistle Blowing Policy (which should specifically highlight 'safeguarding')
- the name of the designated safeguarding lead
- name of the nominated Governor for child protection/safeguarding
- contact details for Staffordshire LADO service (re Allegations against adults working in Education)

The Policy should also be linked to wider policies such as Attendance & Behaviour, Anti-bullying, Health and Safety, e-safety, Restrictive Physical Intervention, PSHEE/citizenship curriculum including safeguarding children from radicalisation (Prevent).

Parents should be routinely informed of the existence of the setting's Child Protection/Safeguarding Children policy, both on admission and subsequently. It must be publicly available and it would be good practice to have this available on the organisation's website. Students and students should also be made aware, in an age appropriate way, about the policy. A reference to the policy is included in Chase Grammar's Parental hand book. A full copy of the safeguarding policy is available to parents if requested from the school office. It may also be helpful to include a summary of the school's responsibilities in the governor's annual report.

## **(b) Practice**

The Designated Safeguarding Lead (DSL) must ensure that staff follow Chase Grammar School procedures and advise the Principal or deputy designated safeguarding lead (in accordance with the organisation's procedures) **without delay** about welfare concerns. The Designated Safeguarding Lead must then make a professional judgment about whether the concerns can be dealt with by the school in conjunction with child and parents or whether the concerns meet the threshold for the involvement of other agencies. In particular, this means:

- there is effective induction for child protection and safeguarding for all adults working in the school be they staff or volunteers (including work experience students), and supply agency staff (see 'Keeping children safe in education' 2015 and section on 'professional development' below).
- ensuring that all staff have read at least part one of the statutory DFE guidance 'Keeping children safe in education' (page 3).
- making sure that welfare concerns are raised by staff/volunteers when appropriate
- ensuring that the names and contact details of the DSL/Deputy are on display for all staff, parents, students and visitors to Chase Grammar School
- ensuring that the Designated and Deputy Designated Safeguarding Leads are not out of school (e.g. at training events) at the same time (see Keeping children safe in education).
- ensuring that the telephone number for First Response is available and easily accessible to staff in case, for any reason, the DSL or Deputy are not contactable, in order to ensure there is no unwarranted delay in referral. Statutory guidance says 'anyone' in school may make a referral, but best practice is that this comes via the DSLs who have more training on safeguarding matters,

and may have more relevant information about the child than the referrer.

- discussing concerns as required with outside agencies e.g. a specific agency for single need (e.g. speech and language), multiple agencies/LST (e.g. CAF process) or First Response/existing social worker (child protection - significant harm concerns or acute need)
- completing all necessary paperwork and correspondence including referral forms to Local Support Teams or the Multi agency referral forms (MARF) in regard to child protection referrals
- ensuring that Chase Grammar School is represented by a DSL at child protection conferences, core groups and multi-agency meetings about 'Children in Need'. It is the Designated Safeguarding Lead who should attend Child Protection Conferences rather than another representative from the school. If this is not possible, the Deputy Designated Safeguarding Lead should attend. If neither can attend it may be appropriate, given support from a DSL both before and after the meeting, for a class teacher or pastoral worker from the school to attend. If apologies must be given then a written report must be submitted prior to the conference (a template is available on the [Staffordshire Education Safeguarding Advice](#) - designated safeguarding lead tab)
- compiling a written report to be shared verbally at the child protection conference. The contents of this should generally be shared with parents (and possibly older children depending on circumstances) before the conference takes place – see link above. This should be via a meeting so that the contents can be explained and discussed. It is not appropriate to send such a report in a written form to the parents
- ensuring there is appropriate representation on Core Groups when a child is on a child protection plan. If the most appropriate person is a class teacher, there must be joint working with the Designated Safeguarding Lead – consider appropriate safeguarding supervision arrangements
- ensuring there are appropriately trained staff to lead on EHAs (Early Help Assessments) and that all staff are aware of the EHA process
- ensuring that the team manager in the LST (local support team) is advised of any EHAs implemented by the school even if there is no involvement of LST staff
- ensuring that relevant staff are informed and advised about appropriate action when a child is subject to a Child Protection Plan
- ensuring that welfare records are kept securely and confidentially (locked in a cabinet and with limited access)
- that child protection/welfare records are chronologically recorded, with significant incidents or events clearly highlighted.
- ensuring that relevant welfare records or child protection records are transferred when a child changes school or goes to college (if under 18 years of age).
- a mechanism is in place to support the Designated Safeguarding Leads in regard to their child protection responsibilities e.g. weekly/monthly one to one meetings between the Designated and Deputy Designated Safeguarding Leads to offer mutual support and reflection on cases, or between Designated Safeguarding Leads working in a locality (confidentiality must be maintained) – see 'Working Together to Safeguard Children 2015' (page 53)

- keeping the school's SLT informed about child protection issues as appropriate
- responding in a timely manner to requests for information from the Local Authority and Staffordshire Safeguarding Children Board. The Local Authority has a duty to monitor the compliance of schools/colleges with statutory guidance in relation to Safeguarding, which includes audit procedures in relation to Section 175/157 of the Education Act 2002 and Section 11 of the Children Act 2004. The SSCB has a duty to ensure the effectiveness of what is done by each organisation to safeguard and promote the welfare of children
- ensuring the curriculum is developed in a way which supports the understanding, awareness and resilience of children and takes into account current research into the risks to children and young people

The Designated Safeguarding Lead does not necessarily have to do all the casework themselves, but he/she must ensure that it is done.

### **Allegations or concerns about adults working in a position of trust in the school**

Allegations or concerns about conduct of adults who work in Chase Grammar School should be referred to the Principal or, if it is about the Principal, to the Chair of the Advisory Committee. However, the DSL may be contacted directly by colleagues who are concerned about an adult's conduct, or by parents or children. If the DSL is not the Principal, he/she must discuss the issues with the Principal or Chair of the Advisory Committee, as appropriate. The DSL should not rely on the person raising concerns to do this but can support that person to ensure that it happens. If, for any reason, the DSL does not think that the Principal or Chair of the Advisory Committee is taking appropriate action, the DSL must discuss with the Local Authority Designated Officer (LADO). The DSL must also ensure that all adults working in the organisation are aware of the Chase Grammar School Whistle Blowing Policy so that if there are concerns about staff which are not being addressed under standard school/college reporting allegations procedures, they can follow this process.

Those working in specific sectors (Early Years or care of children up to the age of eight e.g. in after school clubs), should be asked to declare at induction and on a regular basis, whether they have a caution or conviction that would disqualify them from working with children, or if they live in the same household as someone with a disqualifying offence (EYFS and KCSE supplementary guidance October 2014 – 'disqualification under the childcare act 2006).

### (c) Procedures

Designated Safeguarding Leads should ensure that:

- concerns from individual staff are written down using an internal pro forma and kept safely in a way which is confidential but accessible when required (a template is available under the 'Useful Documents tab' at [Staffordshire Education Safeguarding Advice](#))
- written accounts of any incidents are available when making a referral
- all referrals are backed up in writing within 48 hours using the multi-agency referral form (MARF) – downloadable from the SSCB website (procedure 3B)
- staff are informed as appropriate of actions arising from conferences, reviews, core group meetings and of children subject to a child protection plan
- risk management plans are implemented when appropriate e.g. a child has demonstrated harmful sexual behaviour, or a level of violence and aggression is putting children and/or staff at risk of harm
- Relevant and proportionate information is passed confidentially and in a timely manner to the Designated Safeguarding Lead in a child's subsequent school/college. The best place for a child's WHOLE child protection history is in their CURRENT education setting. This can save a great deal of time later on
- The Advisory Committee and Proprietor receive information about safeguarding procedures and processes in the school on a regular basis. This does **not** mean that confidential information about children is shared with the Advisory Committee. The Advisory Committee should understand the safeguarding issues faced by Chase Grammar School and be regularly updated about numbers of children subject to Child Protection, Child in Need or Team Around the Child plans, current safeguarding issues for school/community, and any resourcing issues. A template for reporting to the Advisory Committee is available on [Staffordshire Education Safeguarding Advice](#)

Remember that any records kept specifically for the purposes of child protection may be exempt from the usual regulations about parents' right of access. If there are welfare concerns that have not reached the threshold for child protection, this may also apply. If a parent puts in a formal request to see their child's records, advice should always be sought in regard to the data protection issues from the County Council Information Governance Unit or the organisation's own legal team.

### (d) Professional Development

The Designated Safeguarding Lead is responsible for both their own and their colleagues' professional development and training in regard to Safeguarding Children. Every Designated Safeguarding Lead in a Staffordshire Education Setting should:

- attend the Staffordshire SSCB level 2 foundation course on "Working Together". Details of the courses and locations are available on the [SSCB website](#)
- attend appropriate multi agency training at least every 2 years. It is **not** necessary or appropriate

to redo the Level 2 Working Together Course every 2 years. Multi-agency Refresher training or courses in regard to specific child protection and welfare concerns are offered through the SSCB Training team e.g. Designated Safeguarding Person/Lead training

- ensure that all staff (including Designated Safeguarding Leads and Principal) receive 'Level One' child protection training at least every three years that meets the requirements of the SSCB training strategy and has been quality assured
- provide a briefing for all staff at least annually to update them on the importance of child protection and any new issues, and remind them of the school procedures
- ensure that staff are kept up to date by including an agenda item on safeguarding children at regular staff meetings
- ensure that staff receive relevant continuous professional development training around safeguarding issues e.g. that pastoral staff attend SSCB training around specific issues such as child sexual exploitation, self-harm and intent to commit suicide, neglect or domestic violence (see website for further information: [www.staffsscb.org.uk](http://www.staffsscb.org.uk))
- ensure that all newly-appointed staff, volunteers, Advisory Committee, and agency staff, (teaching and non-teaching), are given necessary information about the school's Safeguarding Children policy and procedures, and training in the local procedures by an **induction** into safeguarding. All adults working within the school, including work experience placements, need a robust induction into safeguarding, including safer working practices such as dress and codes of conduct when working with children. Statutory guidance 'Keeping Children Safe in Education' says that the school/college must have a Staff Behaviour Policy/Code of Conduct.

(NB – The Advisory Committee need the knowledge and information to be able to carry out their safeguarding responsibilities. In order to evidence that all Advisory Committee should attend 'Level One' child protection training, irrespective of whether the school has appointed a Nominated Advisory Committee for Child Protection. It is good practice to ensure that all Advisory Committee members are invited to any Level One inset or twilight safeguarding training which is being delivered in the school. If they are unable to attend such a session, they must receive an induction into the school or college's safeguarding processes. It is also recommended that they complete '**The Awareness of Child Abuse & Neglect**' SSCB e-learning core or foundation package or attend a Level One safeguarding course for Advisory Committee members (Designated Safeguarding Leads should ensure they keep a record of this training by taking a copy of the certificate).



## Contact Details

Staffordshire County Council Learning Net website – includes a template safeguarding policy, information regarding procedures when there are concerns or allegations against staff, safer working practice guidance, record keeping guidance, checklist for best practice, and links to statutory guidance:

Hyperlink: [Staffordshire Education Safeguarding Advice](#)

Full website address: <http://education.staffordshire.gov.uk/Student-Support/Families-First-in-School/Education-safeguarding-support/Education-safeguarding-support.aspx>

Education Safeguarding Advice Service (ESAS) 01785 895836 or email: [esas@staffordshire.gov.uk](mailto:esas@staffordshire.gov.uk)

<b>First Response (includes LADO service)</b>	<b>0800 1313 126</b>
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<b>Emergency Duty Team (out of office hours)</b>	<b>0845 604 2886</b>
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SSCB: inter-agency training and procedures	<a href="http://www.staffsscb.org.uk">www.staffsscb.org.uk</a>
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Workforce Development Team (Level one training and for submission of nomination forms for level 2 training):

Miranda Smith: email [safeguardingtraining@staffordshire.gov.uk](mailto:safeguardingtraining@staffordshire.gov.uk), or telephone: 01785 854577

## Annex C: Intimate Care Policy

### Introduction

The pastoral care of our children is central to Chase Grammar School's aims, ethos and teaching programmes and we are committed to developing positive and caring attitudes in all our children. Our Intimate Care Policy is part of our collective pastoral care policies. This policy is in line with multi-agency guidance as found in the Area Child Protection Committees' (ACPC) Regional Policy and Procedures (2005). It is our intention to develop independence in each child, however there will be occasions when help is required. The principles and procedures apply to everyone involved in the intimate care of children.

'Intimate care may be defined as an activity required to meet the personal care needs of each individual child in partnership with the parent, carer and the child.' (9.26, ACPC Regional Policy and Procedures). In school this may occur on a regular basis or during a one-off incident. Chase Grammar School is committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times. We recognise that there is a need to treat all our children with respect when intimate care is given. No child should be attended to in a way that causes distress or pain and adults and staff must be sensitive to each child's individual needs. Intimate care is any care which involves one of the following:

1. Assisting a child to **change his/her clothes**
2. **Changing or washing a child** who has soiled him / herself
3. Assisting with **toileting** issues
4. Supervising a child involved in **intimate self-care**
5. Providing **first aid** assistance
6. **Providing comfort** to an upset or distressed child
7. **Feeding** a child
8. Providing **oral care** to a child
9. Assisting a child who requires a specific **medical procedure** and who is not able to carry this out unaided\*

\* In the case of a specific procedure only a person suitably trained and assessed as competent should undertake the procedure, parents have the responsibility to advise the school of any known intimate care needs relating to their child.

### Principles of Intimate Care

The following are the fundamental principles of intimate care upon which our policy guidelines are based:

- Every child has a right to be safe;
- Every child has the right to personal privacy;
- Every child has the right to be valued as an individual;
- Every child has the right to be treated with dignity and respect;
- All children have the right to be involved and consulted in their own intimate care to the best of their abilities;
- All children have the right to express their views on their own intimate care and to have their views taken into account; and

- Every child has the right to have levels of intimate care that are appropriate and consistent.

### **Assisting a child to change his / her clothes**

This is more common in our Foundation Stage. On occasions an individual child may require some assistance with changing if, for example, he / she has an accident at the toilet, gets wet outside, or has vomit on his / her clothes etc. Staff will always encourage children to attempt undressing and dressing unaided. However, if assistance is required this will be given. Staff will always ensure that they have a colleague in attendance when supporting dressing/undressing and will always give the child the opportunity to change in private, unless the child is in such distress that it is not possible to do so. If staff are concerned in any way parents will be sent for and asked to assist their child and informed if the child becomes distressed.

### **Changing a child who has soiled him/herself (EYFS and KS1)**

Children in the EYFS are the most likely to have accidents, which may initially go unreported. On discovering a child has soiled him/herself it is paramount that the child's needs are considered and he/she should be comforted and reassured throughout. The following guidelines outline our procedures but we will also seek to make age-appropriate responses.

- The Head of Prep is to be consulted and the decision taken on the basis of loco-parentis and our duty of care to meet the needs of the child.
- Children should be supervised and assisted in their changing. This should be with a member of staff and should be in an area where other children are not present.
- School will have a supply of wipes, clean underwear and spare uniform for this purpose. (A supply of clean underwear and spare uniforms are available in the Prep Dept.).
- The child's Parents should be contacted and informed that he/she has soiled him/herself, explaining what may have been the trigger for this. Should this be a regular occurrence suitable discussions will need to take place with the Parents and the school in order to best meet the individual needs of the child.
- The member of Staff who has assisted a student with intimate care will complete the intimate care record.

### **Changing a child who has soiled him/herself (KS2 and above)**

If a child soils him/herself in school a professional judgement has to be made whether it is appropriate to change the child in school, or request the parent/carer to collect the child for changing. In either circumstance the child's needs are paramount and he/she should be comforted and reassured throughout. The following guidelines outline our procedures but we will also seek to make age-appropriate responses.

- The child will be given the opportunity to change his / her underwear in private and carry out this process themselves.
- School will have a supply of wipes, clean underwear and spare uniform for this purpose. (A supply of clean underwear and spare uniforms are available outside the Medical Room).
- If a child is not able to complete this task unaided, school staff will attempt to contact the emergency contact to inform them of the situation.

- If the emergency contact is able to come to school within an appropriate time frame, the child will be accompanied and supported by a staff member until they arrive. This avoids any further distress and preserves dignity.
- If the emergency contact cannot attend, school will seek verbal permission for staff to change the child. If none of the contacts can be reached the Principal is to be consulted and the decision taken on the basis of loco-parentis and our duty of care to meet the needs of the child.
- The member of Staff who has assisted a student with intimate care will complete the intimate care record.

#### **General Guidance: CARE – CONCERN – COMMUNICATE**

#### **Pastoral Care Procedures**

- Ensure the child is happy with who is changing him/her.
- Be responsive to any distress shown.

#### **Basic hygiene routines**

- Always wear protective disposable gloves.
- Seal any soiled clothing in a plastic bag for return to parents.

### **Providing comfort or support to a child:**

There are situations and circumstances where children seek physical comfort from staff (particularly children in Early Years). Where this happens staff need to be aware that any physical contact must be kept to a minimum.

When comforting a child or giving reassurance, staff must ensure that at no time can the act be considered intimate.

If physical contact is deemed to be appropriate, staff must provide care which is professionally appropriate to the age and context.

If a child touches a member of staff in a way that makes him/her feel uncomfortable this can be gently but firmly discouraged in a way which communicates that the touch, rather than the child, is unacceptable. If a child touches a member of staff, as noted above, this should be discussed, in confidence with the Designated Safeguarding Lead or Deputy safeguarding Lead with responsibility for Prep.

### **Assisting a child who requires a specific medical procedure and who is not able to carry this out unaided**

Our Administration of Medications Policy outlines arrangements for the management of the majority of medications in school. **Parental permission must be given before any medication is dispensed in school – a letter with parental instructions and signature must be handed to the Principal and kept on the student's file with the medication.**

A small number of children will have significant medical needs and in addition to the arrangements included in our First Aid Policy will have an Individual 'Care Plan'. This Care Plan will be formulated by the relevant medical body. If required, school staff will receive appropriate training.

### **Swimming**

Our Prep school classes participate in a swimming programme at Chase Leisure Centre. Children are entitled to respect and privacy when changing their clothes however, there must be the required level of supervision to safeguard young people with regard to health and safety considerations and to ensure that bullying, teasing or other unacceptable behaviour does not occur.

Chase Leisure Centre is organised on a village style changing basis. This supports effective and discrete supervision and privacy for our children when changing. Where a child needs additional support for changing parental permission will be sought and a personal care plan will be drawn up so as to maintain dignity but increase independence.

### **Residential Trips**

Residential educational visits are an important part of our Year 7 and Year 8 school experience. We offer many cultural trips abroad for KS3, KS4 and KS5. Particular care is required when supervising students in this less formal setting. As with Extra-Curricular Activities, although more informal relationships in such circumstances tend to be usual, staff are still guided by our Safeguarding

procedures, Pastoral Care and Code of Conduct Policies. Some specific Intimate Care issues may arise in a Residential context.

### **Showering**

Children are entitled to respect and privacy when changing their clothes or taking a shower. However, there must be the required level of supervision to safeguard young people with regard to health and safety considerations, and to ensure that bullying, teasing or other unacceptable behaviour does not occur. This means that staff should announce their intention of entering changing rooms, avoid remaining in changing rooms unless student needs require it, avoid any physical contact when children are in a state of undress and avoid any visually intrusive behaviour.

Given the vulnerabilities of the situation, it is strongly recommended that when supervising children in a state of undress, another member of staff is present. However, this may not always be possible and therefore Staff need to be vigilant about their own conduct, e.g. adults must not change in the same place as children or shower with children.

It is best practice in our school that when an incident has taken place that has necessitated a member of staff to be present when children are changing that an incident report is made.

### **Night Time Routines**

It is established practice that the children's bedrooms are private spaces and anyone else wanting to enter the room should knock and announce their intention to enter.

At bedtime, children are given a set amount of time to change and prepare for bed and will be told when the supervising teachers will visit the rooms to check all is okay and switch off the lights. A reciprocal arrangement is in place in the mornings.

There are occasions when incidents take place during the night and the need arises to:

- Assist a child to **change his / her clothes**
- **Change a child** who has soiled him / herself
- **Provide comfort** to an upset or distressed child
- Assist a child who requires a specific **medical procedure** and who is not able to carry this out unaided
- Guidance as above will be followed with the support of an additional member of staff in attendance

### **School Responsibilities**

All members of staff working with children are vetted by the Education Authority (formerly NEELB). This includes students on work placement and volunteers who may be left alone with children. Vetting includes criminal record checks and two references.

Only those members of staff who are familiar with the intimate care policy and other Pastoral Care Policies of the school are involved in the intimate care of children.

Where anticipated, intimate care arrangements are agreed between the school and parents and, when appropriate and possible, by the child. Consent forms are signed by the parent and stored in the child's file.

**Only in emergency would staff undertake any aspect of intimate care that has not been agreed by parents and school.** Parents would then be contacted immediately.

The views of all relevant parties should be sought and considered to inform future arrangements.

If a staff member has concerns about a colleague's intimate care practice he or she must report this to the Designated Safeguarding Lead.

### **Guidelines for Good Practice**

All children have the right to be safe and to be treated with dignity and respect. These guidelines are designed to safeguard children and staff. They apply to every member of staff involved with the intimate care of children.

Young children and children with special educational needs can be especially vulnerable. Staff involved with their intimate care need to be particularly sensitive to their individual needs.

Members of staff also need to be aware that some adults may use intimate care, as an opportunity to abuse children. It is important to bear in mind that some forms of assistance can be open to misinterpretation. Adhering to the following guidelines of good practice should safeguard both children and staff.

1. **Involve the child in the intimate care.** Try to encourage a child's independence as far as possible in his or her intimate care. Where a situation renders a child fully dependent, talk about what is going to be done and, where possible, give choices. Check your practice by asking the child or parent about any preferences while carrying out the intimate care.
2. **Treat every child with dignity and respect and ensure privacy appropriate to the child's age and situation.** Care should not be carried out by a member of staff working alone with a child.
3. **Make sure practice in intimate care is consistent.** As a child may have multiple carers a consistent approach to care is essential. Effective communication between all parties ensures that practice is consistent.
4. **Be aware of your own limitations.** Only carry out activities you understand and feel competent with. If in doubt, ask. Some procedures must only be carried out by members of staff who have been formally trained and assessed.
5. **Promote positive self-esteem and body image.** Confident, self-assured children who feel their bodies belong to them are less vulnerable to sexual abuse. The approach you take to intimate care can convey lots of messages to a child about their body worth. Your attitude to a child's intimate care is important. Keeping in mind the child's age, routine care can be both efficient and relaxed.

6. **If you have any concerns you must report them.** If you observe any unusual markings, discolouration or swelling report it immediately to the Designated Teacher for Child Protection.

If a child is accidentally hurt during intimate care or misunderstands or misinterprets something, reassure the child, ensure their safety and report the incident immediately to the designated teacher. Report and record any unusual emotional or behavioural response by the child. A written record of concerns must be made available to parents and kept in the child's personal file.

### **Working with Children of the Opposite Sex**

There is positive value in both male and female staff being involved with children. Ideally, every child should have the choice for intimate care but the current ratio of female to male staff means that assistance will more often be given by a woman. The intimate care of boys and girls can be carried out by a member of staff of the opposite sex with the following provisions:

- When intimate care is being carried out, all children have the right to dignity and privacy, i.e. they should be appropriately covered, the door closed or screens/curtains put in place;
- If the child appears distressed or uncomfortable when personal tasks are being carried out, the care should stop immediately. Try to ascertain why the child is distressed and provide reassurance;

Report any concerns to the Designated Teacher for Child Protection and make a written record; Parents must be informed about any concerns.

### **Communication with Children**

It is the responsibility of all staff caring for a child to ensure that they are aware of the child's method and level of communication. Depending on their maturity and levels of stress children may communicate using different methods - words, signs, symbols, body movements, eye pointing, etc. To ensure effective communication:

- Make eye contact at the child's level;
- Use simple language and repeat if necessary;
- Wait for response;
- Continue to explain to the child what is happening even if there is no response; and
- Treat the child as an individual with dignity and respect.



### Intimate Care – Permission

Should it be necessary, I give permission for the child named below to receive intimate care. This may involve a trained member of school staff assisting with one of the following:

- Assisting a child to **change his/her clothes**
- **Changing or washing a child** who has soiled him / herself
- Assisting with **toileting** issues
- Supervising a child involved in **intimate self-care**
- Providing **first aid** assistance
- **Providing comfort** to an upset or distressed child
- **Feeding** a child
- Providing **oral care** to a child
- Assisting a child who requires a specific **medical procedure** and who is not able to carry this out unaided\*

\* In the case of a specific procedure only a person suitably trained and assessed as competent should undertake the procedure, parents have the responsibility to advise the school of any known intimate care needs relating to their child.

I understand that staff will endeavour to encourage my child to be independent and I understand that I will be informed discretely should intimate care need to be given.

I am fully aware of the school's responsibilities and of the school's Safeguarding (Child Protection) Policy.

**Name of Child:**

\_\_\_\_\_

**Signature of Parent/Guardian:**

\_\_\_\_\_

**Print Name:**

\_\_\_\_\_

**Date:**

\_\_\_\_\_

### Record of Intimate Care

Name of Child	Date	Time	Comments	Staff Involved	Signature

## **Annex D – Substance Abuse**

### **Substance Abuse Policy**

This policy has been written in line with the DfE and ACPO Drugs Advice for Schools (September 2012) and Standard 6 (Safety of Boarders) of the National Minimum Standards (NMS) for Boarding Schools (April 2015) endorsed by the Independent School's Inspectorate (ISI). The policy covers:

- Introduction
- References
- The Legal Position
- Chase Grammar School Rules and Sanctions regarding Alcohol, Smoking and Substance Abuse
- Education relating to Alcohol, Smoking and Substance Abuse at Chase Grammar School

This policy has been reviewed and approved by the Board of Directors (Proprietors) on 13 April 2016.

## 1. Introduction

Concern at the physical, social and moral consequences of alcohol and drug abuse by teenagers was a significant factor in the recommendation in the 2008 report to the Government by the Advisory Group on Drug and Alcohol Education that OFSTED should, in future, be required to inspect and report upon the quality of education in this area. This recommendation could impact upon independent schools, which are already required as part of their duties to provide pastoral care (ISI Regulatory Standard 3.1) to have a policy on alcohol, illegal drugs and tobacco. This report emphasised the importance of education in leading young people to make “healthy, informed choices.”

## 2. References

- DfE and ACPO Drugs Advice for Schools (September 2012)
- <http://www.talktofrank.com/faq/what-drug-classification-system> (January 2014)
- <https://www.gov.uk/penalties-drug-possession-dealing> (August 2015)
- MOSA “Guidelines for the Management of Alcohol Intoxication” ([www.mosa.org.uk](http://www.mosa.org.uk))
- B. MOSA “Testing for Substance Misuse in Schools” ([www.mosa.org.uk](http://www.mosa.org.uk))
- C. The Education (Independent School Standards) (England) Regulations 2003 and amended (SI2003/1910)
- D: ISI Regulatory Checklist (0907)
- E: DOH Guidance “Boarding Schools: National Minimum Standards, Inspection Regulations” [http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_4006331](http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4006331)
- F. Farrer & Co ([www.farrer.co.uk](http://www.farrer.co.uk)) for the ISBA Briefing Note: “The Licensing Act 2003” (ISBA Bulletin 35/03)
- G. “Alcohol Concern” ([www.alcoholandfamilies.org.uk](http://www.alcoholandfamilies.org.uk))
- H. “Drug Education: An Entitlement for All. A Report to the government by the Advisory Group on Drug and Alcohol Education” ([www.teachernet.gov.uk](http://www.teachernet.gov.uk))
- I. “Intervention in Schools to prevent and reduce alcohol use among children and young people” National Institute for Health and Clinical Excellence ([www.nice.org.uk](http://www.nice.org.uk))

## 3. The Legal Position

### The Licensing Act 2003

This act brought about a wholesale change to the licensing arrangements currently in place for selling and supplying alcohol and providing entertainment. The new Act unified the authorities with control of licensing (now the local authority will be the only Licensing Authority) and brought together the legislation and the licenses required for the following Licensable Activities:

- sale of alcohol
- supply of alcohol by a club
- provision of “Regulated Entertainment”
- late night refreshments

### Sale of Alcohol

Before 2003, when selling alcohol at school the individual who authorises the sale had to hold a Justices' On-license. This license allowed that person to sell alcohol within the premises listed on the license – be it the school bar, hall or elsewhere. If alcohol was only sold to the members of a club rather than to the public, as was the case with sixth form bar, then the club must have held a Club Registration Certificate. The Justices' On-licenses were abolished under the new Act and replaced by a Premises License and the nomination of a Designated Premises Supervisor holding a Personal License.

### **The Premises License**

This will be granted to the school itself (or more accurately “the proprietor of the educational establishment”; this has the same meaning as in the Higher Education Act 1996 viz. “the person or body of persons responsible for the management of the school”, i.e. in Chase Grammar School's case, the Proprietor and Advisory Committee) rather than to an individual. Such licenses will be granted on a permanent basis and will run until revoked or surrendered. When the school hires out its premises for private functions such as weddings and/or parties, the outside caterers may well hold a license for selling alcohol but this is not sufficient under the new Act - the school premises themselves must be licensed, not just an individual. The major change introduced by the new licensing regime is the fact that it permits schools to carry out more than one of the new Licensable Activities. This means that if your school sells alcohol and carries out Regulated Entertainment, both activities will be covered by the catch-all Premises License.

### **The Designated Premises Supervisor**

As mentioned, the Premises License is not all the school needs if selling alcohol. The new Act still places responsibility on individuals for the sale of alcohol. Therefore, the school will nominate a Designated Premises Supervisor to be the point of contact for the Licensing Authority, the police and the fire service. The DPS must hold a Personal License. This new license is the nearest equivalent to the previous Justices' License but unlike the old Justices' License it does not tie an individual to specific premises. A bar manager or otherwise will be able to move freely between venues if needs be.

### **Supply of Alcohol by a Club**

Under the old licensing regime, individuals under the age of 18 were able to consume alcohol in non-profit making members' clubs. This allowed schools to run successful bars for their sixth-formers which were established as a members' club. Members' clubs were treated with a light touch where licensing was concerned. They only had to register their club with the Court (and obtain a Club Registration Certificate) in order to supply their members and guests with alcohol. The new Act changed this by requiring clubs to be formally licensed under a **Club Premises Certificate**, although the licensing system became less stringent than for other licensed premises.

### **Sale and Supply of Alcohol to Under-18s**

A major change was how under-18s would be treated in clubs. Clubs are brought into line with all other licensed premises, so it became an offence to sell alcohol or to supply alcohol to those under the age of 18. Both the Club itself and the individual physically supplying the alcohol can be charged with the offence. It is also an offence for a person under 18 to buy or attempt to buy alcohol or, where he/she is a member of a club, for alcohol to be supplied to him/her by or on behalf of the club.

### **Supply (but not sale) of Alcohol to 16-18 year olds**

There is one narrow exception to this: children aged 16 and 17 are permitted to consume (but not buy) beer, wine or cider with a table meal if they are in the company of adults. A table meal is defined in the Act as being a meal which is eaten at a table or similar surface and it is thought that Authorities

will expect the meal to be a substantial one, eaten with a knife and fork. Schools could take advantage of this by creating a dining club where alcoholic beverages could be consumed by the sixth formers. However, it would have to be under permanent adult supervision.

### **Sixth Form Bars**

There is no discretion for Licensing Authorities in relation to sixth-form bars: it will be unlawful for Authorities to turn a blind eye to the legislation. The Government issued the following guidance: “Previously registered members’ clubs also enjoyed another privilege of being outside the normal licensing regime: the freedom to sell alcohol to minors and allow them to consume it on the club premises. Although in recent years, most clubs have operated voluntary rules which prohibit sales and supply of alcohol to those under 18 years old, the 2003 Act has removed this privilege and the sale or supply of alcohol to children is now unlawful”. Under the new Act, therefore, many schools were left with no option but to abandon the supply of alcohol in their Sixth Form bars.

### **Regulated Entertainment**

Under the new Act, regardless of whether or not alcohol is available, schools must be licensed if they intend to carry out Regulated Entertainment. This includes any of the following activities carried out to any extent for members of the public or a section of the public or for a fee charged with a view to profit:

- performance of a play
- performance of a dance
- performance of live music
- an indoor sporting event

If the public is not invited and invitations are to a private audience only (such as parents and friends) then a licence will not be required. The distinction between public and private events is not made clear in the Act and time will tell which events will fall into which category. As a rule of thumb, if your event is open to the public (i.e. people other than parents, teachers, students and their friends are allowed to attend) and is advertised rather than by invitation only, it will be classed as Regulated Entertainment. To carry out the activity the school will need to obtain a Premises Licence (which it may already need if it is selling alcohol). However, unlike the position with alcohol, the Premises Licence is all that is required to carry out the activity.

If the number of performances at the school will be restricted during the year to less than 12 then a school may consider applying for a temporary licence for each event rather than the permanent catch-all Premises Licence. Schools will be exempt from the normal fee required to obtain a Premises Licence in connection with Regulated Entertainment. The exemption, however, does not apply if the school is also selling alcohol.

### **The Medical Position**

MOSA guidance, “Alcohol and the Management of Student Intoxicated with Alcohol” is a useful reference document.

## Smoking – the Law

It has been illegal to smoke in public places, including schools, since 01 July 2007. Chase Grammar School complies and is a non- smoking site.

## Substance Abuse

**The different kinds of controlled drugs, often referred to as 'illegal drugs', are divided into three different categories, or classes.** These classes (A, B and C) carry different levels of penalty for possession and dealing. The Misuse of Drugs Act is the main piece of legislation covering drugs and their categorisation.

## Penalties for Possession and Dealing

Table taken from: <https://www.gov.uk/penalties-drug-possession-dealing> (August 2015):

Class	Drug	Possession	Supply and production
A	Crack cocaine, cocaine, ecstasy (MDMA), heroin, LSD, magic mushrooms, methadone, methamphetamine (crystal meth)	Up to 7 years in prison, an unlimited fine or both	Up to life in prison, an unlimited fine or both
B	Amphetamines, barbiturates, cannabis, codeine, ketamine, methylphenidate (Ritalin), synthetic cannabinoids, synthetic cathinones (eg mephedrone, methoxetamine)	Up to 5 years in prison, an unlimited fine or both	Up to 14 years in prison, an unlimited fine or both
C	Anabolic steroids, benzodiazepines (diazepam), gamma hydroxybutyrate (GHB), gamma-butyrolactone (GBL), piperazines (BZP), khat	Up to 2 years in prison, an unlimited fine or both (except anabolic steroids - it's not an offence to possess them for personal use)	Up to 14 years in prison, an unlimited fine or both
Temporary class drugs*	Some methylphenidate substances (ethylphenidate, 3,4-dichloromethylphenidate (3,4-DCMP), methylnaphthidate (HDMP-28), isopropylphenidate (IPP or IPPD), 4-methylmethylphenidate, ethylnaphthidate, propylphenidate) and their simple derivatives	None, but police can take away a suspected temporary class drug	Up to 14 years in prison, an unlimited fine or both

\* The government can ban new drugs for 1 year under a 'temporary banning order' while they decide how the drugs should be classified.

## **Misuse of Drugs Act**

All of the drugs on the list above, whether Class A, B or C, are designated as controlled drugs under the Misuse of Drugs Act 1971. Class A drugs are considered to be the most likely to cause harm. The Misuse of Drugs Act states that it is an offence to:

- possess a controlled substance unlawfully
- possess a controlled substance with intent to supply it
- supply or offer to supply a controlled drug (even if it is given away for free)
- allow a house, flat or office to be used by people taking drugs

Drug trafficking attracts serious punishment, including life imprisonment for Class A offences.

## **Cannabis**

Cannabis was reclassified from Class C to Class B in January 2009. The maximum penalty for supply, dealing, production and trafficking is 14 years imprisonment. The maximum penalty is five years imprisonment.

## **Young people in possession of Cannabis**

A young person found to be in possession of cannabis will be arrested and taken to a police station where they can receive a reprimand, final warning or charge depending on the seriousness of the offence. Following one reprimand, any further offence will lead to a final warning or charge. Any further offence following a warning will normally result in criminal charges. After a final warning, the young offender must be referred to a Youth Offending Team to arrange a rehabilitation programme. This police enforcement is consistent with the structured framework for early juvenile offending established under the Crime and Disorder Act 1998.

## **Adults in possession of Cannabis**

Anyone caught in possession of cannabis could be arrested. Alternatively, police may:

- issue a warning (primarily for first-time offenders)
- issue a penalty notice for disorder, with an on-the-spot fine of £80

## **2010 Drug Strategy**

On 08 December 2010, the government released its new drug strategy: 'Reducing demand, restricting supply, building recovery: supporting people to live a drug-free life'.

## **Rules and Sanctions regarding Alcohol, Smoking and Substance Abuse**

### **Alcohol**

Chase Grammar School is licensed to provide alcohol under [2] and [3] below. Applications are made to the local authority for provision of alcohol under [1] above for limited duration when required. The school does not provide alcohol under [4] below.



- [1] sale of alcohol
- [2] supply of alcohol by a club
- [3] provision of “Regulated Entertainment”
- [4] late night refreshments

Chase Grammar School appoints a Designated Premises Supervisor in order to provide alcohol on certain occasions.

We may offer wine to parents and guardians at certain formal events, including plays and concerts to which they are invited. We expect that parents will cooperate and not permit their children to drink on these occasions.

Chase Grammar School Prep students and students in Years 7-11 are not allowed to consume or possess alcohol. We believe that students in their final two years at the school should learn that the moderate consumption of alcohol has its place in our civilisation when accompanied by food and lively conversation, therefore Sixth Form students over the age of 16 are allowed to drink alcohol under staff supervision on special occasions approved by the Principal. On all such occasions, food and non-alcoholic drinks will be available. A senior member of staff will be in charge of each event and will monitor carefully any student who is drinking, setting an appropriate limit and being responsible for the distribution of alcohol. Students must not drink alcohol on any school trips where local law prohibits it; otherwise the policy is as for the consumption of alcohol in school. We do not allow the students to bring alcohol onto the premises, or to consume alcohol on the journey to or from school. Sixth Formers over the age of 16 are therefore permitted to drink alcohol under the following rules:

- Alcohol is provided by the member of staff responsible of a particular event (Event Organiser), under the oversight of the Designated Premises Supervisor (DPS).
- The event at which alcohol is served must have its own unique Risk Assessment which must be counter-signed by the DPS and Principal.
- Alcohol shall only be served to Sixth Form students with a valid parental consent form.
- Written permission for the controlled consumption of alcohol under these guidelines must be received from parents for any students in the school.
- Permission will be accepted as applying for the whole of the student’s time in the Sixth Form.
- The alcohol shall be dispensed by the member(s) of staff named on the Risk Assessment.
- No student shall be served any alcohol if there is any indication that she has already had any alcohol in the previous 24 hours or if she is unwell.
- The maximum quantity of alcohol supplied to any student shall not exceed the equivalent of three units of alcohol, but it may be appropriate for a lower limit.
- It is the responsibility of the Event Organiser to ensure that students consuming alcohol are also eating a reasonable amount of food.

### **Smoking**

Chase Grammar School is, by law a no smoking site and this extends to all the buildings, grounds and gardens. Smoking is therefore illegal for everyone, including staff and visitors. Smoking is not permitted within the school grounds or buildings by staff, students, parents or visitors on any occasion, in or outside full term. It is an offence to be found in possession of matches, lighters,

cigarettes or other related items. Students may not smoke off the school premises when under the direct care of the school (this includes on all school trips, visits, expeditions and special occasions). The school does not and will not provide smoking areas, directly or indirectly support the act of smoking and will take action following the appropriate disciplinary procedure against any student or member of staff who smokes anywhere within the school campus. Staff are reminded that to smoke immediately outside the gates of a school is also prohibited by law and that smoking in the vicinity of Chase Grammar School is likely to bring the school into disrepute and must be avoided.

### **Substance Abuse**

The Proprietor, Advisory Committee and Principal intend Chase Grammar School to be and remain an environment free from illegal drugs and the 'culture' of drugs. Any breach of this policy is treated as a very serious breach of school discipline. Any student found in possession of or using solvents or illegal drugs should expect to be permanently excluded from the school and the police informed.

### **Searching a student's belongings**

The school has a duty to initiate searches of person, belongings, accommodation etc. if the Principal is satisfied that there are reasonable grounds for suspicion. A search will be conducted by a senior member of staff with another member of staff as a witness (see Policy to promote good behaviour and to set out the sanctions for misbehaviour for further guidance on searching students and on sanctions). The Police will immediately be involved if illegal substances are discovered. Circumstances under which drug testing may be necessary are set out below.

### **Education relating to Alcohol, Smoking and Drugs**

As part of the school's commitment to the welfare of students and in accordance with the duty of care owed to students in a boarding environment the school believes it has a duty to inform and educate students on the consequences of drug use and abuse. Accordingly, the school's Lifeskills programme includes short courses on substance abuse in addition to other aspects of health education such as smoking, alcohol, eating disorders, sex and sexuality, STDs. Experts are invited into the school on a regular basis and are informed of the school's values and policy on these matters before they address the students.

We have extensive education built into our Lifeskills programme at Chase Grammar School that focus upon the potential risks from excessive consumption of alcohol and risks of smoking. They concentrate on teaching the importance of young people making healthy, informed choices. Education also extends across the curriculum, involving English, science and drama lessons. We also have assemblies on the topic, and from time to time make use of travelling workshops and road shows to cover the serious risks from abuse of alcohol, tobacco and illegal substances.

Medical staff play an active role in promoting greater awareness about the risks involved with the misuse of alcohol, smoking and substance abuse, and will offer informed medical advice. Students can discuss their individual worries about drinking and smoking with their houseparent, matron, tutor, or any member of the pastoral team. They can also refer themselves to staff for individual guidance, without fearing sanctions or adverse report. We are also very conscious of the importance of working together with parents in order to promote the well-being of all the students.

## **Drugs Testing**

### **Testing**

It is Chase Grammar School policy that where an investigation leads to the view that serious suspicion of the consumption of illegal drugs rests upon an individual or individuals, students and parents must accept that testing for the presence of illegal drugs, usually by urine testing, will be instigated under the direction of the school's matron. Such testing should not be perceived as any form of punishment in itself, nor as having any value other than that of producing information which may or may not be helpful to investigators and investigatees.

It must be understood that a urine test which proves negative does not necessarily endorse the innocence of the person(s) in respect of whom investigations are conducted; equally, a positive result may, under certain circumstances, need yet further scrutiny before it may be taken as definitive evidence of guilt.

In any instance of testing the dignity of the individual being tested must be upheld at all times. Thus, any such procedure must be protected by appropriate levels of confidentiality. No such procedure may be instigated without the prior knowledge and consent of parent(s) or guardian and the consent of the student him or herself.

The school does not endorse a policy of random testing for illegal drugs.

**ONLINE SAFETY POLICY**

1. Introduction
2. Roles and Responsibilities
3. Links with other school policies
4. Social Media
5. Safe Use of Images
6. Online Safety in the Curriculum
7. Equal Opportunities
8. Parental Involvement
9. Responsibility of All Users
10. Staff Professional Responsibilities
11. Online Safety Skills Development for Staff
12. Breaches and Incident Reporting
13. Review Procedures
14. Current Legislation

Appendix 1: Acceptable Use Agreement: Students

Appendix 2: Acceptable Use Agreement: Staff

## **1. Introduction**

Technology is part of everyday life in the 21<sup>st</sup> century, and is a significant resource to support learning and teaching. At CGS, we aim to equip our students with the skills to use technology safely, to access life-long learning and to lay the foundations for use of ICT in careers.

Information and Communications Technology covers a wide range of resources including web-based and mobile learning. Currently the internet technologies children and young people are using both inside and outside of the classroom include:

- Websites
- Apps
- Email, Instant Messaging and chat rooms
- Social Media, including Facebook and Twitter
- Mobile/ Smart phones with text, video and/ or web functionality
- Other mobile devices including tablets and gaming devices
- Online Games
- Learning Platforms and Virtual Learning Environments
- Blogs and Wikis
- Podcasts
- Video sharing
- Downloading
- On demand TV and video, movies and radio / Smart TVs

Whilst exciting and beneficial both in and out of the context of education, all users need to be aware of the range of risks associated with the use of these Internet technologies and that some have minimum age requirements (13 years in most cases).

At Chase Grammar School, we understand the responsibility to educate our students on online safety issues, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom.

Schools hold personal data on learners, staff and others to help them conduct their day-to-day activities. Some of this information is sensitive and/or confidential. Everybody in the school community has a shared responsibility to secure any sensitive information used in their day to day professional duties.

Both this policy and the Acceptable Use Agreement are inclusive of both fixed and mobile internet, technologies provided by the school (such as PCs, laptops, mobile devices, webcams, whiteboards, voting systems, digital video equipment, etc.), and technologies owned by students and staff, but brought onto school premises (such as laptops, mobile phones and other mobile devices).

## **2. Online Safety Roles and Responsibilities**

As online safety is an important aspect of strategic leadership within the school, the Principal has ultimate responsibility to ensure that the policy and practices are embedded and monitored. Simona Parker (Network Manager) and John Simpson (Teacher of ICT) have joint responsibility for the

implementation and monitoring of online safety in the school.

### **3. Links with Other School Policies**

This policy, supported by the school's acceptable use agreements for staff is to protect the interests and safety of the whole school community. It is linked to the following school policies: safeguarding, health and safety, and behaviour (including the counter-bullying) policy and Lifeskills.

### **4. Social Media**

Online technologies, including social networking sites, if used responsibly both outside and within an educational context, can provide easy to use, creative, collaborative and free resources. However it is important to recognise that there are issues regarding the appropriateness of some content, contact, culture and commercialism. To this end, we encourage our students to think carefully about the way that information can be added and removed by all users, including themselves, from these sites:

- Students should set and maintain their online profiles to maximum privacy and deny access to unknown individuals.
- Students should be cautious about the information given by others using social media (for example users not being who they say they are)
- Students are taught to avoid placing images of themselves (or details within images that could give background details) online and to consider the appropriateness of any images they post due to the difficulty of removing an image once online.
- Students are always reminded to avoid giving out personal details on websites which may identify them or where they are (full name, address, mobile/ home phone numbers, school details, IM/ email address, specific hobbies/ interests).
- Students are encouraged to be wary about publishing specific and detailed private thoughts and information online.
- Our students are asked to report any incidents of cyberbullying to the school.
- [Staff should follow the School's Code of Conduct when using social media, as well as the guidance in this policy](#)

### **5. Safe Use of Images**

#### **Taking of Images and Film**

Digital images are easy to capture, reproduce and publish. They should not be misused. We must remember that it is not appropriate to take or store images of any member of the school community or public, without first seeking consent and considering appropriateness.

- With the written consent of parents/carers (on behalf of students) and staff, the school permits the appropriate taking of images by staff and students with school equipment.
- Parents/carers may opt out of the appropriate taking of images by staff and students with school equipment. The School in turn will keep an official record of consent given by parents/carers on the School's database.

- Staff are not permitted to use personal digital equipment, such as mobile phones and cameras, to record images of students, this includes when on field trips. However, with the express permission of the Principal or Vice Principal, images can be taken provided they are transferred immediately and solely to the school's network and deleted from the staff device.
- Students are not permitted to use personal digital equipment, including mobile phones and cameras, to record images of students, staff and others without consent.

## **6. Online Safety in the Curriculum**

ICT and online resources are increasingly used across the curriculum. We aim to provide online safety guidance to students on a regular basis:

- The school has a framework for teaching internet skills in Computing/ICT lessons in year 7, 8 & 9.
- Educating students about the online risks that they may encounter outside school is part of the ICT curriculum
- Students are made aware of the relevant legislation when using the internet (such as data protection and intellectual property) which may limit what they want to do but also serves to protect them.
- Students are taught about copyright, respecting other people's information, safe use of images and other important areas through discussion, modeling and appropriate activities.
- Students are taught to critically evaluate materials and learn good searching skills
- Staff across the school are made aware of ways in which they can incorporate online safety into their lessons where appropriate.

## **7. Equal Opportunities**

### **Students with Additional Needs**

Staff are aware that some students may require additional support or teaching including reminders, prompts and further explanation to reinforce their existing knowledge and understanding of online safety issues.

Where a student has poor social understanding, careful consideration is given to group interactions when raising awareness of online safety. Internet activities are planned and well managed for these children and young people, and the guidance of the SENDCO is sought where necessary.

## **8. Parental Involvement**

It is essential for parents/carers to be fully involved with promoting online safety both in and outside of school and to be aware of their responsibilities. We seek to promote a wide understanding of the benefits of new technologies, together with the associated risks. Parents are involved, for example, when students sign their "Acceptable Use Agreement".

## **9. Responsibility of all users of technology**

All users of information and technology are responsible for their actions:

- You are responsible for all activity on school systems carried out under any access/account rights assigned to you, whether accessed via school ICT equipment or your own PC.
- Do not allow any unauthorised person to use school ICT facilities and services that have been provided to you.
- Ensure you remove portable media from your computer when it is left unattended.
- Use only your own personal logons, account IDs and passwords and do not allow them to be used by anyone else.
- Keep your screen display out of direct view of any third parties when you are accessing personal, sensitive, confidential or classified information.
- Ensure you lock your screen before moving away from your computer during your normal working day to protect any personal, sensitive, confidential or otherwise classified data and to prevent unauthorised access.
- Ensure that you logoff from the PC completely when you are going to be away from the computer for a longer period of time.
- Do not introduce or propagate viruses.
- It is imperative that you do not access, load, store, post or send from school ICT any material that is, or may be considered to be, illegal, offensive, libelous, pornographic, obscene, defamatory, intimidating, misleading or disruptive to the school or may bring the school into disrepute. This includes, but is not limited to, jokes, chain letters, files, emails, clips or images that are not part of the school's business activities; sexual comments or images, nudity, racial slurs, gender specific comments, or anything that would offend someone on the basis of their age, sexual orientation, religious or political beliefs, national origin, or disability (in accordance with the Sex Discrimination Act, the Race Relations Act and the Disability Discrimination Act).
- Any information held on School systems, hardware or used in relation to School business may be subject to The Freedom of Information Act.
- Where necessary, obtain permission from the owner or owning authority and pay any relevant fees before using, copying or distributing any material that is protected under the Copyright, Designs and Patents Act 1998.

## **10. Staff Professional Responsibilities**

When using any form of ICT, including the Internet, in school and outside school, staff should follow these guidelines:

- Ensure all electronic communication with students, parents, carers, staff and others is compatible with your professional role and in line with school policies.
- Do not talk about your professional role in any capacity when using social media such as Facebook and YouTube.
- Do not put online any text, image, sound or video that could upset or offend any member of the whole school community or be incompatible with your professional role.



- Use school ICT systems and resources for all school business. This includes your school email address, school mobile phone and school video camera.
- Do not leave unattended a computer that is logged on.
- Do not give out your own personal details, such as mobile phone number, personal e-mail address or social network details to students, parents, carers and others, unless failure to do so would put a child in greater danger. In such exceptional cases, the DSL should be made aware of the reasons for the decision as soon as possible. See **Personal Mobile Devices** below for other exceptions to this guidance.
- Do not disclose any passwords and ensure that personal data (such as data held on SIMS) is kept secure and used appropriately.
- Only take images of students and/ or staff for professional purposes, in accordance with school policy and with the knowledge of SLT.
- Do not browse, download, upload or distribute any material that could be considered offensive, pornographic, illegal or discriminatory.
- Ensure that your online activity, both in school and outside school, will not bring the school or your professional role into disrepute.
- You have a duty to report any online safety incident about which you have concerns.

### **School ICT Equipment including Portable & Mobile ICT Equipment & Removable Media**

#### School ICT Equipment

- School ICT equipment should not be removed from school premises.
- As a user of the school ICT equipment, you are responsible for your activity.
- Ensure that all ICT equipment that you use is kept physically secure.
- Do not attempt unauthorised access or make unauthorised modifications to computer equipment, programs, files or data. This is an offence under the Computer Misuse Act 1990.
- It is imperative that you save your data on a frequent basis to the school's network. You are responsible for the backup and restoration of any of your data that is not held on the school's network.
- Personal or sensitive data should not be stored on the local drives of desktop PC, laptop, USB memory stick or other portable device. If it is necessary to do so the local drive must be encrypted.
- Privately owned ICT equipment should not be used on a school network.
- On termination of employment, resignation or transfer, return all ICT equipment to your line manager. You must also provide details of all your system logons so that they can be disabled.
- It is your responsibility to ensure that any information accessed from your own PC or removable

media equipment is kept secure, and that no personal, sensitive, confidential or classified information is disclosed to any unauthorised person.

- All redundant ICT equipment is disposed of in accordance with Waste Electrical and Electronic Equipment (WEEE) directive and Data Protection Act (DPA).

### **Portable & Mobile ICT Equipment**

This section covers such items as laptops, mobile devices and removable data storage devices. Please refer to the relevant sections of this document when considering storing or transferring personal or sensitive data.

- All activities carried out on school systems and hardware will be monitored in accordance with the general policy.
- Staff must ensure that all school data is stored on the school network, and not kept solely on the laptop. Any equipment where personal data is likely to be stored must be encrypted.
- Equipment must be kept physically secure in accordance with this policy to be covered for insurance purposes. When travelling by car, best practice is to place the laptop in the boot of your car before starting your journey.
- Synchronise all locally stored data, including diary entries, with the central school network server on a frequent basis.
- Ensure portable and mobile ICT equipment is made available as necessary for anti-virus updates and software installations, patches or upgrades.
- The installation of any applications or software packages must be authorised by the ICT support team, fully licensed and only carried out by your ICT support.
- Portable equipment must be transported in its protective case if supplied.
- Portable equipment should not be removed from the school premises.

### **Internet Access**

The internet is an open worldwide communication medium, available to everyone, at all times. Anyone can view information, send messages, discuss ideas and publish material which makes it both an invaluable resource for education, business and social interaction, as well as a potential risk to young and vulnerable people. All internet use is logged and the logs are randomly but regularly monitored. Whenever any inappropriate use is detected it will be followed up.

### **Managing the Internet**

- The school provides students with supervised access to Internet resources (where reasonable) through the school's fixed and mobile internet connectivity.
- Staff should preview any recommended sites, online services, software and apps before use.
- Searching for images through open search engines is discouraged when working with students.
- If Internet research is set for homework, specific sites should be suggested that have previously been checked by the teacher. It is advised that parents recheck these sites and supervise this work. Parents will be advised to supervise any further research.

- All users must observe software copyright at all times. It is illegal to copy or distribute school software or illegal software from other sources.
- All users must observe copyright of materials from electronic resources.

### **Internet Use**

- You must not post personal, sensitive, confidential or classified information or disseminate such information in any way that may compromise the intended restricted audience.
- Do not reveal names of colleagues, students, others or any other confidential information acquired through your job on any social networking site or other online application.
- On-line gambling or gaming is not allowed.
- It is at the Principal's discretion as to what internet activities are permissible for staff and students and how this is disseminated.

### **Infrastructure**

- Chase Grammar School is aware of its responsibility when monitoring staff communication under current legislation and takes into account; Data Protection Act 1998, The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000, Regulation of Investigatory Powers Act 2000, Human Rights Act 1998.
- Staff and students are aware that school based email and internet activity can be monitored and explored further if required.
- If staff or students discover an unsuitable site, the screen must be switched off/ closed and the incident reported immediately to Simona Parker or John Simpson.
- Staff using personal removable media are responsible for measures to protect against viruses, for example making sure that additional systems used have up-to-date virus protection software. It is neither the school's responsibility nor the network managers to install or maintain virus protection on personal systems.
- Staff and students should not download or install any additional programs to the network.

### **Email**

#### **Managing email**

- The school gives all staff their own email account to use for all school business as a work based tool. This is to protect staff, minimise the risk of receiving unsolicited or malicious emails and avoids the risk of personal profile information being revealed.
- Staff should use their school email for all professional communication.
- It is the responsibility of each account holder to keep their password secure.
- Staff should not contact students, parents or conduct school business using personal email addresses. The DSL should be informed immediately if staff have used their personal email account for school business.

- All emails should be written and checked carefully before sending, in the same way as a letter written on school headed paper.
- Emails created or received as part of your school job will be subject to disclosure in response to a request for information under the Freedom of Information Act 2000.
- Staff must inform Simona Parker or John Simpson if they receive an offensive email.
- However you access your school email (whether directly, through webmail when away from the office or on non-school hardware) all the school email policies apply.

### **Sending emails**

- Keep the number and relevance of email recipients, particularly those being copied, to the minimum necessary and appropriate.
- Avoid sending emails to 'All'. Use 'Senior', 'Prep', 'Staff' and other appropriate groups.
- School email is not to be used for personal advertising.

### **Receiving emails**

- Check your email daily.
- Never open attachments from an untrusted source; if in doubt, consult Simona Parker or John Simpson
- Do not use the email systems to store attachments. Detach and save business related work to the appropriate shared drive/folder.
- The automatic forwarding and deletion of emails is not allowed.

### **Emailing Personal or Confidential Information**

- Staff sending emails of a confidential nature relating to students, e.g. matters pertaining to safeguarding and child protection, should cc. the Principal, and the Designated Safeguarding Lead.

Where your conclusion is that email must be used to transmit such data:

- Do not send the information to any person whose details you have been unable to separately verify (usually by phone)
- Send the information as an encrypted document attached to an email
- Do not identify such information in the subject line of any email
- Request confirmation of safe receipt

### **Publishing Students' Images and Work**

On a child's entry to the school, all parents/carers are asked to give permission to use their child's work/photos in school publications.

Parents or carers may withdraw permission, in writing, at any time.

## **Storage of Images**

- Students and staff are not permitted to use personal portable media for storage of images (e.g., USB sticks) without express permission.
- Rights of access to this material are restricted to the teaching staff and students within the confines of the school network or other online school resource.

## **Data Security**

- The school gives relevant staff access to SIMS, with a unique username and password.
- It is the responsibility of everyone to keep passwords secure.
- Staff should be aware of their responsibility when accessing school data, e.g. confidentiality of data.
- Staff have been issued with the relevant guidance documents and the Policy for ICT Acceptable Use.
- Staff keep all school related data secure. This includes all personal, sensitive, confidential or classified data.
- Staff should avoid leaving any portable or mobile ICT equipment or removable storage media in unattended vehicles. Where this is not possible, keep it locked out of sight.
- Staff should always carry portable and mobile ICT equipment or removable media as hand luggage, and keep it under their control at all times.
- It is the responsibility of individual staff to ensure the security of any personal or sensitive information contained in documents faxed, copied, scanned or printed. This is particularly important when shared copiers (multi-function print, fax, scan and copiers) are used.
- Anyone sending a confidential or sensitive fax should notify the recipient before it is sent.

## **Personal or Sensitive Information**

- Ensure that any school information accessed from your own PC or removable media equipment is kept secure, and remove any portable media from computers when not attended.
- Ensure you lock your screen before moving away from your computer during your normal working day to prevent unauthorised access.
- Ensure the accuracy of any personal or sensitive information you disclose or share with others.
- Ensure that personal, sensitive, confidential or classified information is not disclosed to any unauthorised person.
- Ensure the security of any personal or sensitive information contained in documents you fax, copy, scan or print. This is particularly important when shared copiers (multi-function print, fax, scan and copiers) are used and when access is from a non-school environment.
- Only download personal data from systems if expressly authorised to do so by the Principal.
- You must not post on the internet personal or sensitive information, or disseminate such information in any way that may compromise its intended restricted audience.
- Keep your screen display out of direct view of any third parties when you are accessing personal, sensitive, confidential or classified information.

- Ensure hard copies of data are securely stored and disposed of after use in accordance with the document labelling.

### **Storing/Transferring Personal or Sensitive Information Using Removable Media**

- By using the School's virtual desktop facility there should not be a need to use removable media on a regular basis.
- Store all removable media securely.
- Securely dispose of removable media that may hold personal data.
- Ensure hard drives from machines no longer in service are removed and stored securely or wiped clean.

### **Passwords and Password Security**

#### **Passwords**

- Always use your own personal passwords.
- Make sure you enter your personal passwords each time you logon. Do not include passwords in any automated logon procedures.
- Staff should change temporary passwords at first logon.
- Change passwords whenever there is any indication of possible system or password compromise.
- Do not record passwords or encryption keys on paper or in an unprotected file.
- Only disclose your personal password to authorised ICT support staff when necessary, and never to anyone else.
- Never tell a child or colleague your password.
- If you aware of a breach of security with your password or account inform Simona Parker or John Simpson immediately.
- Passwords should contain a minimum of six characters and be difficult to guess.
- Passwords should contain a mixture of upper and lowercase letters, numbers and symbols.

#### **Password Security**

Password security is essential for staff, particularly as they are able to access and use student data. Staff are expected to have secure passwords which are not shared with anyone. The students are expected to keep their passwords private and not to share with others, particularly their friends. Staff and students are regularly reminded of the need for password security.

- All users read and sign an Acceptable Use Agreement to demonstrate that they have understood the school's e-Safety Policy and Data Security.
- Users are provided with an individual network, email, learning platform and Management Information System log-in username. They are also expected to use a personal password and keep it private.

- Students are not permitted to deliberately access on-line materials or files on the school network or local storage devices of their peers, teachers or others.
- Staff are aware of their individual responsibilities to protect the security and confidentiality of the school networks, MIS systems and/or learning platform, including ensuring that passwords are not shared and are changed periodically. Individual staff users must also make sure that workstations are not left unattended and are locked.
- Due consideration should be given when logging into the school learning platform, virtual learning environment or other online application to the browser/cache options (shared or private computer).

## **Mobile technologies**

Many emerging technologies offer new opportunities for teaching and learning including a move towards personalised learning and 1:1 device ownership for young people. Mobile technologies such as smartphones, Blackberries and iPads provide a collaborative, well-known device with possible internet access and thus open up risk and misuse associated with communication and internet use. Emerging technologies will be examined for educational benefit and the risk assessed before use in school is allowed. Our school chooses to manage the use of these devices in the following ways so that users exploit them appropriately.

### **Personal Mobile Devices (including phones)**

- The school allows staff to bring in personal mobile phones and devices for their own use. Members of staff should not use their personal mobiles to contact a student or parent / carer except in specific authorized situations (e.g. bus drivers)
- The school is not responsible for the loss, damage or theft of any personal mobile device
- The sending of inappropriate text messages between any member of the school community is not allowed.
- Permission must be sought before any image or sound recordings are made on these devices of any member of the school community.
- Users bringing personal devices into school must ensure there is no inappropriate or illegal content on the device.

### **School Provided Mobile Devices (including phones)**

- Permission must be sought before any image or sound recordings are made on the devices of any member of the school community.
- Where the school provides mobile technologies such as phones, laptops and iPads for offsite visits and trips, only these devices should be used.
- Never use a hand-held mobile phone whilst driving a vehicle.

## **11. Online Safety Skills Development for Staff**

Staff are given tips, reminders and training through, for example, “Tips on Tuesdays”, email reminders and INSET opportunities.

## **12. Monitoring, Incident Reporting, Online Safety Incident Log & Infringements**

Authorised ICT staff or SLT may inspect any ICT equipment owned or leased by the school at any time without prior notice.

Authorised staff may monitor, intercept, access, inspect, record and disclose telephone calls, emails, instant messaging, internet/intranet use and any other electronic communications (data, voice, video or image) involving employees or contractors, without consent, to the extent permitted by law. This may be to confirm or obtain school business related information; to confirm or investigate compliance with school policies, standards and procedures; to ensure the effective operation of school ICT; for quality control or training purposes; to comply with a Subject Access Request under the Data Protection Act 1998, or to prevent or detect crime.

Authorised staff may, without prior notice, access the email or voicemail account where applicable, of someone who is absent in order to deal with any business-related issues retained on that account.

All monitoring, surveillance or investigative activities are conducted by authorised staff and comply with the Data Protection Act 1998, the Human Rights Act 1998, the Regulation of Investigatory Powers Act 2000 (RIPA) and the Lawful Business Practice Regulations 2000.

Please note that personal communications using School ICT may be unavoidably included in any business communications that are monitored, intercepted and/or recorded by the School’s ICT monitoring software (see Appendix A).

### **Incident Reporting**

Any security breaches or attempts, loss of equipment and any unauthorised use or suspected misuse of ICT must be immediately reported to Simona Parker or John Simpson. Additionally, all security breaches, lost/stolen equipment or data, virus notifications, unsolicited emails, misuse or unauthorised use of ICT and all other policy non-compliance must be reported.

### **Concerns and Complaints**

Concerns and complaints and/or any issues relating to online safety should be made to the Simona Parker or John Simpson.

### **Inappropriate Material**

- All users are aware of the procedures for reporting accidental access to inappropriate materials. The breach must be immediately reported to Simona Parker or John Simpson
- Deliberate access to inappropriate materials by any user will lead to the incident being logged by the relevant responsible person, and an investigation. Depending on the



seriousness of the offence, sanctions could include immediate suspension, possibly leading to dismissal and involvement of police for very serious offences.

- Users are made aware of sanctions relating to the misuse or misconduct by following the appropriate conditions as set out within the School's Behaviour Policy.

## **Breaches**

A breach or suspected breach of policy by a school employee, contractor or student may result in the temporary or permanent withdrawal of school ICT hardware, software or services from the offending individual, and may also result in disciplinary action.

Policy breaches may also lead to criminal or civil proceedings.

## **13. Review Procedure**

There are ongoing opportunities for staff to discuss any online safety issues that concerns them.

There are ongoing opportunities for staff to discuss with a member of SLT any issue of data security that concerns them.

This policy will be reviewed annually and updated.

## **14. Legislation**

### **Acts Relating to Monitoring of Staff email**

#### **Data Protection Act 1998**

The Act requires anyone who handles personal information to comply with important data protection principles when treating personal data relating to any living individual. The Act grants individuals rights of access to their personal data, compensation and prevention of processing.

<http://www.hms0.gov.uk/acts/acts1998/19980029.htm>

#### **The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000**

<http://www.hms0.gov.uk/si/si2000/20002699.htm>

#### **Regulation of Investigatory Powers Act 2000**

Regulating the interception of communications and making it an offence to intercept or monitor communications without the consent of the parties involved in the communication. The RIP was enacted to comply with the Human Rights Act 1998. The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000, however, permit a degree of monitoring

and record keeping, for example, to ensure communications are relevant to school activity or to investigate or detect unauthorised use of the network. Nevertheless, any monitoring is subject to informed consent, which means steps must have been taken to ensure that everyone who may use the system is informed that communications may be monitored. Covert monitoring without informing users that surveillance is taking place risks breaching data protection and privacy legislation.

<http://www.hmsso.gov.uk/acts/acts2000/20000023.htm>

### **Human Rights Act 1998**

<http://www.hmsso.gov.uk/acts/acts1998/19980042.htm>

### **Other Acts Relating to E-Safety**

#### **Racial and Religious Hatred Act 2006**

It is a criminal offence to threaten people because of their faith, or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

#### **Sexual Offences Act 2003**

The new grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. Schools should already have a copy of "*Children & Families: Safer from Sexual Crime*" document as part of their child protection packs.

#### **Communications Act 2003 (section 127)**

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

#### **The Computer Misuse Act 1990 (sections 1 – 3)**

Regardless of an individual's motivation, the Act makes it a criminal offence to gain:

15. access to computer files or software without permission (for example using another person's password to access files).
16. unauthorised access, as above, in order to commit a further criminal act (such as fraud).
17. impair the operation of a computer or program .

UK citizens or residents may be extradited to another country if they are suspected of committing any of the above offences.

### **Malicious Communications Act 1988 (section 1)**

This legislation makes it a criminal offence to send an electronic message (email) that conveys indecent, grossly offensive, threatening material or information that is false; or is of an indecent or grossly offensive nature if the purpose was to cause a recipient to suffer distress or anxiety.

### **Copyright, Design and Patents Act 1988**

Copyright is the right to prevent others from copying or using work without permission. Works such as text, music, sound, film and programs all qualify for copyright protection. The author of the work is usually the copyright owner, but if it was created during the course of employment it belongs to the employer. Copyright infringement is to copy all or a substantial part of anyone's work without obtaining the author's permission. Usually a licence associated with the work will allow a user to copy or use it for limited purposes. It is advisable always to read the terms of a licence before you copy or use someone else's material. It is also illegal to adapt or use software without a licence or in ways prohibited by the terms of the software licence.

### **Public Order Act 1986 (sections 17 – 29)**

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence.

### **Protection of Children Act 1978 (Section 1)**

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison.

### **Obscene Publications Act 1959 and 1964**

Publishing an "obscene" article is a criminal offence. Publishing includes electronic transmission.

### **Protection from Harassment Act 1997**

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other.

A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

### **Acts Relating to the Protection of Personal Data**

#### **Data Protection Act 1998**

[http://www.opsi.gov.uk/acts/acts1998/ukpga\\_19980029\\_en\\_1](http://www.opsi.gov.uk/acts/acts1998/ukpga_19980029_en_1)

**The Freedom of Information Act 2000**

<https://ico.org.uk/for-organisations/guide-to-freedom-of-information/>

**Counter-Terrorism and Security Act 2015 (Prevent), Anti-Radicalisation & Counter-Extremism Guidance**

<https://www.gov.uk/government/publications/preventing-extremism-in-schools-and-childrens-services>

### **Appendix 1: Acceptable Use Agreement: Students**

- I will only use ICT systems in school, including the internet, email, digital video, and mobile technologies for school purposes.
- I will not download or install software on school technologies.
- I will only log on to the school network, other systems and resources with my own user name and password.
- I will not reveal my passwords to anyone
- I will only use my school email address for email communication with staff or email through the school office unless from the DSL.
- I will make sure that all ICT communications with students, teachers or others is responsible and sensible.
- I will be responsible for my behaviour when using the Internet. This includes resources I access and the language I use.
- I will not browse, download, upload or forward material that could be considered inappropriate, offensive or illegal. If I accidentally come across any such material I will report it immediately to my teacher.
- I will not give out online any personal information such as name, phone number or address.
- I am aware that when I take images of students and/ or staff, that I must only store and use these for school purposes, with the person's permission, and must never distribute these outside the school network without the permission of all parties involved.
- I will ensure that my online activity, both in school and outside school, will not cause my school, the staff, students or others distress or bring the school community into disrepute, including through uploads of images, video, sounds or texts.
- I will support the school approach to online safety and not upload or add any images, video, sounds or text that could upset any member of the school community.
- I will respect the privacy and ownership of others' work on-line at all times.
- I understand that all my use of the Internet and other related technologies can be monitored and logged and can be made available to my teachers.
- I understand that these rules are designed to keep me safe and that if they are not followed, school sanctions will be applied and my parent/carers may be contacted.

## A6 SAFEGUARDING

- I understand that I cannot wear my Smart Watch in an exam or assessment.
- I will not plagiarise work from the internet.

Students and parents should read and discuss this agreement, then sign below, and follow the terms of the agreement.

I have read and understand Acceptable Use Agreement and agree to follow online safety rules and to support the safe use of ICT at Chase Grammar School.

Name of student (BLOCK CAPITALS) .....

Year Group: .....

Signature of Student .....  
.....

Date:

Signature of Parent .....  
.....

Date:

### Appendix 2: Acceptable Use Agreement: Staff

ICT (including data) and the related technologies such as email, the internet and mobile devices are an expected part of our daily working life in school. This policy is designed to ensure that all staff are aware of their professional responsibilities when using any form of ICT. All staff are expected to sign this policy and adhere at all times to its contents.

- I will only use the school's network / email / Internet, and any related technologies, for professional purposes or for uses deemed acceptable by the Principal.
- I will not disclose any passwords provided to me by the school or other related authorities.
- I will ensure that all electronic communications with students and staff are compatible with my professional role.
- I will not give out my own personal details, such as mobile phone number, personal email address, personal Twitter account, or any other social media link, to students.
- I will only use the approved, secure email system(s) for any school business.
- I will ensure that personal data (such as data held on MIS software) is kept secure and is used appropriately, whether in school, taken off the school premises or accessed remotely.
- Personal data relating to students, parents or other staff can only be taken out of school when authorised by the Principal. Personal or sensitive data taken off site must be encrypted, e.g. on a password secured laptop or password secured memory stick.
- I will not install any hardware or software.
- I will not browse, download, upload or distribute any material that could be considered inappropriate, offensive, illegal or discriminatory.
- Images of students and/ or staff will only be taken, stored and used for professional purposes in line with school policy.
- Images will not be distributed outside the school network without the permission of the parent/ carer, member of staff or Principal.
- I will support the school approach to online safety and not upload or add any images, video, sounds or text linked to or associated with the school or its community.
- I understand that all my use of the Internet and other related technologies can be monitored and logged and can be made available for scrutiny.
- I will respect copyright and intellectual property rights.
- I will ensure that my online activity, both in school and outside school, will not bring the school, my professional reputation, or that of others, into disrepute.
- I will support and promote the School's Online Safety policy and help students to be safe and responsible in their use of ICT and related technologies.
- I understand that a breach of the School's Online Safety policy may constitute a disciplinary offence

#### User Signature

Full Name (BLOCK CAPITALS) .....

Job title .....

Signature .....

Date .....

## Annex F – Staff Code of Conduct

All staff should behave professionally. The Code of Conduct works in conjunction with all school policies to create a happy, caring environment, in which everyone is treated with respect and politeness, and interactions with students are kind, courteous, friendly and helpful. Only in extreme situations, such as emergencies or preventing accidents, should staff need to shout at students. The usual expectation is that we all work together to create a calm learning environment.

**Purpose:** Relationships with fellow staff, employees, advisory board, contractors, visitors, students and their parents or guardians should be reasonable and mutually respectful at all times. The purpose of the code is to confirm and reinforce the professional responsibilities of all staff clarify the legal position in relation to sensitive aspects of staff/student relationships and set out the expectations of standards to be maintained within the School. There needs to be a professional distance between staff and students at all times. The best way of defining this is to say that we can be friendly with students but we are not their friends.

**Your duty:** It is the contractual duty of every member of staff to observe the rules and obligations in this code. You should also follow the guidance unless there is a good reason not to follow it in a particular case.

**Safeguarding:** All staff should have read Part One of the most up-to-date DfE guidance known as “Keeping Children Safe in Education”. Any safeguarding concerns must be raised within 24 hours of the initial concern to one of the school’s DSLs.

**Application:** Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required so as to ensure the safety of children in our care, and to reduce the risk of an allegation of impropriety against a member of staff. This guidance applies to all adults working in this School, and not just teachers. Forming inappropriate relationships with children or young people who are students or students at another school may also be regarded as gross misconduct. Such behaviour tends to bring the School into disrepute and gives rise to concern that the staff involved cannot be trusted to maintain professional boundaries with students and students at the School.

### General guidelines

#### Lead by example:

- Set high standards in public behaviour
- Do all tasks to the highest possible quality.
- Work cooperatively with others, giving support and guidance as required.
- Form good professional relationships with colleagues, students, parents and others outside School.
- Communicate and co-operate courteously, positively and effectively with parents.
- Refrain from gossip. Inevitably we get to know things about parents, students and other staff and their circumstances. If you know of something that affects education or welfare please tell a Tutor or the Principal as appropriate. Under no circumstances should staff discuss personal information with anyone else either inside or outside the School.
- Use appropriate language at all times.
- Dress smartly. For teaching staff: jacket and tie for men; smart office wear for women. Trousers should be smart - no jeans or cords. Games wear must be smart; it should be avoided for classroom lessons and should not be worn on formal occasions.
- Follow the written School procedures.
- Be punctual. Pay punctilious attention to duties, and especially those which involve caring for



children

- Keep clean, tidy and well organised those things for which you are responsible.
- Make a general contribution to both the day and the boarding School. Contribute proportionately to extra-curricular activities.
- Assist generally with students' social and educational development and School administration and management as appropriate.
- Have good attendance and set sufficient appropriate work when absent.
- Share willingly in duties, assemblies, house events etc.
- Actively support and apply all School policies

### **Treat students well, showing care for the individual**

- Treat students as you would expect to be treated.
- Talk to students, not at them.
- Actively build good professional relationships.
- Do not insult students, abuse them verbally, or make derogatory comments, however much provoked.
- Avoid bearing grudges.
- Avoid shouting at a class: the more noise you make the more they make. Try to avoid confrontations: no one wins.
- Teach students to understand that there are at least two sides to any dispute. Accept all students as individuals.
- Maintain relationships with students that are manifestly professional, for as long as the students are studying at School and for a reasonable time afterwards.
- There should be no suggestion of social or intimate relationships with students.
- Display an interest in what students do outside the formal curriculum.
- Encourage good standards of attendance, punctuality, courtesy, honesty, concern for others and cleanliness.
- Help, support, shepherd and look out for all students, particularly new or prospective ones.
- Keep Tutors and other teachers informed as necessary of relevant matters concerning individual students through established procedures
- Extend an influence outside areas of immediate responsibility to assist in maintaining high standards of behaviour throughout the School.

### **Encourage and reward good behaviour.**

- Positively encourage effort and achievement consistent with ability by recognition and reward.
- Frequently notice good student behaviour, praise it and draw attention to it. Follow the school Rewards Policy to reward students with House Points.
- Encourage orderly behaviour and a respect for others and their property.

### **Talk to students about disappointing behaviour.**

- We want to create the right atmosphere where students can think, discover and thrive
- Treat students with courtesy and good manners and expect the same from them.
- Do not hesitate to seek help.
- Tact needs to be shown with older students.
- Use school sanctions according to guidance provided by SLT.
- Take responsibility for the care and maintenance of your own areas of the school at all times, and of any other areas you pass through or observe.

- Make it a priority to be at or near your door on arrival or departure of your class to supervise inside and outside your room.
- Elimination of litter is everybody's responsibility at all times.
- Ensure that students do not chew gum.
- Keep Tutors informed of inappropriate behaviour.
- Correct bad language consistently. If bad language is directed towards you, or a student is rude to you, report the matter immediately.
- Make a written report of any observable act of vandalism.

### Guidance on staff/student relationships

***Behaviour giving particular cause for concern:*** You should take particular care when dealing with a student who:

- appears to be emotionally distressed, or generally vulnerable and/or who is seeking expressions of affection;
- appears to hold a grudge against you
- acts in a sexually provocative way, or who is inclined to make exaggerated claims about themselves and others, or to fantasise, or one whose manner with adults is over-familiar
- may have reason to make up an allegation to cover the fact that he or she has not worked hard enough for public examinations

***Procedure to be followed in these cases:*** Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to one of the DSLs in the School.

***General guidance:*** You should be aware of the general guidance that will apply in all cases. In particular you:

- need to exercise professional judgment but always act within the spirit of these guidelines. If you are involved in a situation where no specific guidance exists, you should discuss the circumstances with a senior colleague. A written record should be kept that includes justification for any action taken
- must be familiar with procedures for handling allegations against staff
- must be aware of the School's Safeguarding Procedures
- must seek guidance from a senior colleague if you are in any doubt about appropriate conduct

***General conduct and behaviour:*** You should observe the School's policy on smoking, alcohol and drugs.

***School property:*** You must take proper care when using School property and you must not use School property for any unauthorised use or for private gain.

***Use of premises:*** You must not carry out on School premises any work or activity other than pursuant to your terms and conditions of employment without the prior permission of the Principal. Residential staff have a right to use their own accommodation on site for non-work activities as long as this does not come into conflict with School business or contravene the spirit of the terms and conditions of employment.

**Good order and discipline:** Teaching staff and other staff in charge or control of students must maintain good order and discipline at all times when students are present on School premises and whenever students are engaged in authorised School activities, whether on School premises or elsewhere.

**Assemblies:** All teachers and Tutors are expected to attend assembly and register the attendance of students as required.

**One-to-one meetings:** If you are teaching or coaching one student, or conducting a one-to-one meeting or teaching session with a student, you should take particular care in the following ways:

- use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson/meeting is taking place
- arrange the meeting during normal School hours when there are plenty of other people about
- do not continue the meeting for any longer than is necessary to achieve its purposes;
- avoid sitting or standing in close proximity to the student, except as necessary to check work
- avoid idle discussion
- avoid any conduct that could be taken as a sexual advance
- report any incident that causes you concern to the Designated Lead for Child Protection under the School's Safeguarding Procedures, and make a written record (signed and dated)
- avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact

### Physical contact

#### *The use of force or physical restraint*

See **A2: Policy to promote good behaviour and to set out the sanctions for misbehaviour**

**When physical contact may be appropriate:** Physical contact with a student may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during Dance, Drama, P.E. or Games.

**Guidance on using physical contact:** You should observe the following guidelines (where applicable):

- explain the intended action to the student
- do not proceed with the action if the student appears to be apprehensive or reluctant, or if you have other concerns about the student's likely reaction
- ensure that the door is open and if you are in any doubt, ask a colleague or another student to be present during the demonstration

**Report concerns:** If you are at all concerned about any instance of physical contact, inform one of the DSLs without delay, and make a written record.

**Offering comfort to distressed students:** Touching may also be appropriate where a student is in distress and needs comforting. You should use your own professional judgement when you feel a

student needs this kind of support and should be aware of any special circumstances relating to the student. For example, a child who has been abused may find physical contact particularly difficult. You should always notify a member of SLT when comfort has been offered and should seek guidance if unsure whether it would be appropriate in a particular case.

**Administering first aid:** When administering first aid you should explain to the child what is happening and ensure that another adult is present or is aware of the action being taken. The treatment must meet the School's Health and Safety at Work Rules and parents should be informed. Wherever possible, first aid should be administered by a school nurse.

**Regular physical contact:** Generally, regular physical contact can only be justified where it is part of an agreed plan such as School policy, or as a result of a Special Educational Need.

**Students' entitlement to privacy:** Children are entitled to privacy when changing or showering. However there still must be an appropriate level of supervision to ensure safety. You should:

- avoid physical contact or intrusive behaviour when children are undressed
- announce yourself when entering changing rooms and avoid remaining unless required
- not shower or change in the same place as children

Where a child has been abused: Where a child has previously been abused, staff should be informed on a 'need to know' basis, and should be extra cautious when considering the necessity of physical contact.

**Students changing for games and other activities:** All students should change in the designated changing rooms. Where students do change in a classroom (only EYFS and KS1) it is important that careful steps are taken to ensure that nobody unexpectedly enters the room, and in such circumstances a notice should be placed on the door 'Please knock and wait. Children changing.'

**Pre-arranged meetings:** Pre-arranged meetings with students outside School should not be permitted unless approval is obtained from their parents and a member of SLT. If you are planning to hold such a meeting, you must inform a member of SLT before the meeting.

**Home visits:** Staff should not conduct home visits except when expressly authorised by the Principal

**Language:** You should use appropriate language at all times. You should:

- avoid words or expressions that have any unnecessary sexual content or innuendo; avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails, social media "likes" or messages etc.)
- avoid any form of aggressive contact such as holding, pushing, pulling or hitting, which could amount to a criminal assault, or threatening words
- avoid any words or actions that are over-familiar
- not swear, blaspheme or use any sort of offensive language in front of students;
- avoid the use of sarcasm or derogatory words when punishing or disciplining students and avoid making unprofessional personal comments about anyone

**Dress:** You should dress appropriately and in a professional manner. Dress must not be offensive, distracting or revealing. Political or other contentious slogans or badges are not allowed.

**Dealing with "crushes":** Crushes, fixations or infatuations are part of normal adolescent development. However they need sensitive handling to avoid allegations of exploitation. If you suspect that a student has a "crush" on you or on another colleague you should bring it to the attention of a DSL at the earliest opportunity.

### **Code of conduct for contact outside School**

**Contact outside School:** You should avoid unnecessary contact with students outside School. You:

- should not give students your home address, home phone number, or personal mobile phone number (unless in an emergency) or personal e-mail address
- should not send personal communications to children unless agreed with a member of SLT and then only use your @chasegrammar.com email account
- should not make arrangements to meet students, individually or in groups, outside School other than on School trips authorised by the Principal or member of SLT
- should avoid contacting students at home unless this is strictly necessary, and you should keep a record of any such occasion and submit a copy to a member of SLT
- should not give a student a lift in your own vehicle other than on School business and with permission from the Principal or in an emergency
- should avoid inviting students (groups or individuals) to your home unless there is a good reason or it has been approved by a member of SLT. This prohibition also applies if you have on site accommodation but it is accepted that boarding staff will occasionally invite students into their accommodation as part of their role (see below)

### ***Student visits to Staff Homes***

There may occasionally be good reasons for students to make a visit to staff homes. Any such visits should be organised according to normal school procedures for trips, with the additional proviso that the Principal or Vice Principal should be informed of the planned event.

### ***Students visiting Staff Boarding Accommodation***

The School considers the willingness of staff to allow students access to their homes as an important element of its pastoral system and a strength in its care of boarders in particular.

The following guidelines have been drawn up for the protection of students and staff:

- 1) Housemasters / Housemistresses and House parents may admit students to their 'public' rooms
- 2) for day to day routine business. These would be the areas of their accommodation used for entertaining parents and other visitors on School business.
- 3) Other resident staff may admit groups of students for group tutorials or for social events such as meals. In these cases the Head of Boarding / Principal should be consulted in advance. They are advised not to admit pupils in groups of less than three.
- 4) It is recommended that staff should not see students in groups of less than three in their accommodation although it is recognised that the Housemaster / Housemistress may find this occasionally necessary. This would be an unusual circumstance and staff are advised to have another member of staff present and another student in support close by. Any situation which could be construed as threatening to the student must be avoided (e.g. doors should be left open not closed).
- 5) Group tutorials may be held in staff accommodation, although staff should keep a record of those attending and the dates of the tutorials.

- 6) If groups of boarders are entertained in staff accommodation (e.g. for a meal or other social event), a note of those attending and where, should be entered by duty staff in the Boarding Log book.
- 7) If students are asked to baby-sit for staff, the following procedure should be followed:
  - a) The student should be at least 15 years old
  - b) Parental consent should be obtained by the Housemaster / Housemistress to cover the term in which this will take place.
  - c) Students must not baby-sit alone.
  - d) Staff should be easily contacted if necessary.
  - e) Students should be able to contact other designated staff on the site (usually their Housemaster / Housemistress).
  - f) Students must not feel pressurised or obliged to baby-sit.
  - g) It is recommended that students return to their accommodation before the published 'In House Times'.
  - h) If students are to return to their accommodation after the published 'In House Times', this must be agreed in advance with the Housemaster / Housemistress and a note sent to the Head of Boarding, as well as a specific time for their return.

**Social contact:** You should be aware that where you meet children or parents socially, such contact could be misinterpreted as grooming. Any social contact that could give rise to concern should be reported to a DSL.

**Friendships with parents and students:** Members of staff who are friends with parents of students or who, for example, are voluntary workers in youth organisations attended by students, will of course have contact with those students outside School. However, members of staff should still respect the above wherever possible and should maintain the level of professionalism outside School which would be expected inside School.

**Arranging social contact as part of scheme or care programme:** Where you are arranging planned social contact with parents or students, such as part of a reward scheme or pastoral care programme, you should still seek the approval of a member of SLT.

**Scope of application of code on contact outside School:** The same guidelines should be applied to after School clubs, School trips, and especially trips that involve an overnight stay away from the School. The principles of this guidance also apply to contact with children or young people who are students at another School.

### Communication with students

**Communicating with children and parents:** All communication with children or parents should conform to School policy and be limited to professional matters. Communication should only be made using School e-mail accounts and telephone lines except in an emergency.

**Application:** These rules apply to any form of communication including new technologies such as mobile 'phones, web-cameras and blogs.

### Code of conduct for photographs and videos

See the eSafety guidance above.

### Confidentiality and data protection

**Treatment of student information:** You should respect the privacy of students, parents and colleagues and should not pass information about, for example, addresses, telephone numbers or email addresses to others, without checking first with the person concerned.

**Consent required:** Lists of students'/parents' names, addresses and email addresses must not be used for any purpose without the consent of the Principal. Information about students, parents or colleagues should never be disclosed to telephone enquirers. You should ask the enquirer to put the request in writing so that it can be dealt with appropriately.

**Disclosing confidential information:** Confidential information should only be disclosed on a need-to-know basis. Where it is not necessary to disclose a child's identity the information should be disclosed anonymously. If you are unsure whether you should disclose information, you should seek advice from a member of SMT.

**Duty to disclose confidential information:** You may have to disclose information, for example where abuse is alleged or suspected. In such cases, there is a duty to pass on the information immediately, but only to the Designated Lead for Child Protection under the School's Safeguarding Procedures. The storing of personal information must not breach the School's Data Protection Policy. Note: never give an undertaking of confidentiality to a student where child protection issues are involved (see separate Safeguarding Policy).

### Gifts and rewards

**If a gift is received:** If you receive a gift you should:

- declare the gift where there is a possibility it could be misconstrued, or in any event where the gift is of a value of more than £100. The Principal may in their absolute discretion require you to decline the gift
- decline outright gifts that could be seen as a bribe or that have created an expectation of preferential treatment. Although it is accepted for parents or children to make small gifts to show appreciation, you must not receive gifts on a regular basis or receive anything of significant value

**Giving gifts and rewards:** Where you are thinking of giving a gift or reward:

- it should only be provided as part of an agreed reward system
- in all cases except the above, the gift or reward should be of little value and should be distributed equally
- selection processes should be fair and where possible should be agreed by more than one member of staff

**Allocation of gifts and rewards:** Decisions regarding entitlement to benefits or privileges such as admission to School trips, activities or classroom tasks must avoid perceptions of bias or favouritism. The selection process must be based on transparent criteria.

### Reporting and criminal offences

**Whistleblowing:** You should report any activities or behaviour of colleagues that give you cause for concern. (See Whistleblowing Policy). You should be familiar with the School's Safeguarding Policy.



**Duty of disclosure:** You are required immediately to notify the School if you are arrested, charged or convicted in relation to any criminal offence, if you receive a police caution, reprimand or warning, or if there is a formal child protection investigation of you or any member of your household under section 47 of the Children Act 1989 as amended.

**Examples of criminal offences:**

In addition to being gross misconduct, it is a criminal offence under the Sexual Offences Act 2003 for a person aged 18 or over who is in a position of trust in relation to another person under 18 to engage in sexual activity with that person. Sexual activity is defined broadly and does not have to include physical contact. The offence is punishable by up to six months' imprisonment and/or an unlimited fine. For the purposes of the Act, a teacher is in a position of trust in relation to students at the School at which he or she is teaching. It should be noted, however, as explained above, that forming inappropriate relationships with children or young people who are students or students at another School may also be regarded as gross misconduct. Such behaviour tends to bring the School into disrepute and gives rise to concern that the staff involved cannot be trusted to maintain professional boundaries with students and students at the School.

The Sexual Offences Act 2003 also introduced the offence of "meeting a child following sexual grooming". This applies where an adult arranges to meet a child aged under 16 in any part of the world, if he has met or communicated with that child on at least two earlier occasions and intends to commit a sexual offence against that child. The law is clearly intended to apply where adults contact children through the internet. However, the prior meetings or communications need not have an explicitly sexual content.

Most sexual activity involving a person under the age of 16 (male or female) is an indecent assault which is both a criminal offence and a matter for which damages can be awarded. This is so, even when the younger person is alleged to have provoked or encouraged the activity.

The Education (Prohibition from Teaching or Working with Children) Regulations 2003 (SI 2003/1184) require that where an employee is dismissed for misconduct or as being unsuitable to work with children (or resigns to avoid such dismissal), he or she must be reported to the Secretary of State and may be barred or restricted from teaching or working with children.

Every complaint by a student must be taken seriously and investigated. It may be necessary to involve social services who may themselves involve the police if there are grounds for thinking that a criminal offence has been committed.

### **Consequences of breaching this policy**

**The School's position:** It is in your interests to follow this policy so as to maintain standards of behaviour and your own professional reputation. A breach of this policy may be treated as misconduct or in serious cases, gross misconduct and will render you liable to disciplinary action up to and including dismissal.



**Annex G – Letter Requesting Safeguarding Information from a Student’s Previous School**

**PRIVATE & CONFIDENTIAL**

**FAO: Designated Safeguard Lead**

**RE: CHILD PROTECTION RECORDS:**

**NAME:**

**D.O.B:**

In accordance with best practice and Child Protection & Safeguarding policies, I am writing to ask if you have any relevant records which should be passed on to us concerning the above student who has enrolled with us here at Chase Grammar School.

If you do have any such Safeguarding/Child Protection records for the young person named above, you should send them to me in a sealed envelope marked “Strictly Confidential”.

If there are no such records, you should complete and return the attached form indicating this.

My personal email address is [mh@chasegrammar.com](mailto:mh@chasegrammar.com) and I can be contacted via the School telephone system on 01543 501800.

Thank you in anticipation of your time and help with this matter.

**Mr M Hartland, Vice Principal and Designated Safeguarding Lead**

**The following student has recently enrolled at Chase Grammar School:**

**Name:**

**D.O.B.:**

**Previous school:**

**Please tick ONE of the following:**

- ☐ There are no safeguarding concerns or records held by us concerning the student named above.
- ☐ Please find included confidential records concerning the student named above.

**Signed:**

**PRINT NAME IN BLOCK CAPITALS:**

**Post held:**

**Date:**

**Return address:**

The Designated Safeguarding Lead  
Chase Grammar School  
Cannock  
Staffordshire  
WS11 0UR

Annex H - Expression of Concern Form

*(Staff should complete JUST THIS PAGE, leaving the black box at the bottom and the next pages blank)*

<b>STUDENT'S NAME:</b> Date of Birth: Year Group: SEN status:	<b>DATE &amp; TIME:</b>
<b>REPORTED BY:</b>	
Disclosure between: - Cause for concern raised by:	
Persons present: -	
Circumstances:	
<b>REPORT: Who? What? (use student's actual words if it was a verbal disclosure) Where? When? Any witnesses? What is student's view? Any other relevant information? Distinguish clearly between fact and opinion</b>	
Indicate "yes" if skin maps attached, otherwise leave blank:	

PRINT NAME:

SIGN:

DATE:

TIME REPORT COMPLETED:

**WHEN COMPLETED PASS TO M. Hartland / M. Simpson / T. Mayhew / I. Sterling immediately**

**DETAILS OF ACTION:**

**INITIALS:**

**DATE:**

*(This box is to be completed by the Designated Safeguarding Lead or a Deputy)*



## ***Child Welfare Concern - Cover Sheet***

**STUDENT'S NAME:**

**Date of Birth:**

<u><b>STATUS:</b></u>	<u><b>Date of Decision</b></u>
CLOSED	
MONITORING	
REFERRAL MADE	WHO is monitoring?
EARLY HELP ASSESSMENT	Date referral sent
CHILD IN NEED PLAN	
CHILD PROTECTION PLAN	

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<b>Date:</b>  <b>Time:</b>	<b>Communication</b> e.g. email / phone/ meeting	<b>Between:</b>	
<b><u>Notes</u></b>			
<b><u>ACTION:</u></b>	<b><u>By Who</u></b>	<b><u>By When?</u></b>	<b>Tick when complete</b>

  

<b>Date:</b>  <b>Time:</b>	<b>Communication</b> e.g. email / phone/ meeting	<b>Between:</b>	
<b><u>Notes</u></b>			
<b><u>ACTION:</u></b>	<b><u>By Who</u></b>	<b><u>By When?</u></b>	<b>Tick when complete</b>

  

<b>Date:</b>  <b>Time:</b>	<b>Communication</b> e.g. email / phone/ meeting	<b>Between:</b>	
<b><u>Notes</u></b>			

### ANNEX I : Whistleblowing

#### Introduction

Chase Grammar School is committed to improving the way in which we safeguard and promote the welfare of children which is crucial to improving outcomes for children and young people. Key Organisations named under section 11 of the Children Act 2004, have a duty to demonstrate that they have effective arrangements in place within their organisation to safeguard and promote the welfare of children. Governing Bodies of Maintained schools have a similar duty under section 175 of the 2002 Education Act, and Independent Schools, Academies and the Further Education Sector under Section 157 of the same Act. As one of these key bodies, Chase Grammar School recognises the need to demonstrate that we have an effective whistle blowing process in place and that our workforce is aware of this process.

This policy aims to:

- Encourage adults working for or within the organisation to feel confident in raising concerns;
- Provide a process by which concerns can be raised and dealt with;
- Receive feedback on the process (where appropriate); and
- Provide a means by which staff can receive support where concerns have been raised.

#### Policy Statement

Staffordshire Safeguarding Children Board (SSCB) and Stoke-on-Trent Safeguarding Children Board (SCB) expect all staff and employees including adults working with children and young people, temporary staff,volunteers, students, contractors or external partner agencies, to express any concerns that they may have with regards to the conduct of any individual(s). The term 'staff' will hereafter include all of the wider workforce, as stated above.

In line with the expectations of both Boards, Chase Grammar School is committed to the highest standards of openness, integrity and accountability. All persons working for, or with this organisation, must feel safe and supported in order to express their concerns.

This policy document is intended to encourage and enable our staff to raise their concerns and to do so without fear of victimisation or discrimination. It does not replace the Complaints Procedure or the Safeguarding Policy or the organisation's standard procedures for reporting allegations or concerns about staff or volunteers. It includes the school's Whistle Blowing Policy in regards to other forms of malpractice covered under the 'Public Interest Disclosure Act'.

The Public Interest Disclosure Act (PIDA) protects the public interest by providing a remedy for individuals who suffer workplace reprisal for raising a genuine concern, whether it is a concern about child safeguarding and welfare systems, financial malpractice, danger, illegality, or other wrongdoing. The concern may relate to something that is happening or has happened in the past. The PIDA covers all workers, including temporary agency staff. It does not cover the self-employed or volunteers. The Act also provides protection should individuals have difficulty gaining a reference from an employer because they have raised a concern. It makes it clear that any clause in a contract that purports to gag an individual from raising a concern that would be protected under the Act is void.

### **What does the safeguarding Whistleblowing Policy cover?**

This policy is designed to cover concerns that staff have about the conduct of individuals in a position of trust within the organisation which could be detrimental to the safety or wellbeing of young people and where staff, for whatever reason, feel unable to raise them under the organisation's standard child protection procedures around dealing with such allegations. It would include issues about (Please be mindful that these are examples of concerns, and are not exhaustive):

- Unprofessional behaviour
- Bullying by staff
- Any form of abuse (physical, sexual, emotional or neglect)
- Name calling
- Personal contact with children and young people which is contrary to the school's policies and codes of conduct
- Any form of racial abuse
- Inappropriate sexualised behaviour
- Knowledge about an individual's personal circumstances which may indicate they could be a risk to children or
- unsuitable to work with children
- Fraud

### **Safeguarding against harassment or victimization**

Chase Grammar School is committed to professional standards and to supporting staff. It is recognised that the decision to report a concern is a difficult one to make. Harassment or victimisation will not be tolerated and Chase Grammar School will take appropriate action in order to protect the person raising the concern when they are acting in good faith.

### **Confidentiality**

All concerns will be treated in confidence, however, there may be a need for the whistle blower to give evidence e.g. if they have witnessed a crime or in regard to disciplinary procedures if this is the outcome.

### **Fraud**

Chase Grammar School recognises The Fraud Act 2006 which details the legal definitions of fraud, and is used for the criminal prosecution of most fraud offences. The Schools also deals with fraud in non-criminal matters. For the purposes of this strategy, the Audit Commission has defined fraud as 'the intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain.' The definition covers various offences including deception, forgery, theft, misappropriation, collusion and misrepresentation.

Overarching the above policies is the fact that Staff Members and Governors are expected to adopt the highest standards of propriety and to follow the 'Nolan' principles of public life which are:

- \* Selflessness
- \* Integrity

- \* Objectivity
- \* Accountability
- \* Openness
- \* Honesty
- \* Leadership

Chase Grammar School recognises that fraud and corruption are costly, both in terms of financial losses and reputational risk. The prevention and detection of fraud is therefore a key objective of the school. In addition, the prevention and detection includes a commitment to:

- Seek to promote an anti-fraud culture across the community by publicising the impact of fraud on the community.
- We will also seek to assist our partners and stakeholders to understand and reduce the threats of fraud.
- Furthermore, we will seek to deter fraudsters through specific publicity and general campaign;
- Publicise counter fraud work to the widest possible audience and all successful prosecutions will be reported to the media;
- Undertake data matching with other Local Authorities and relevant external organisations to pro-actively identify fraudulent activity;
- Continue to subscribe to and work with the National Anti-Fraud Network (NAFN) to ensure it has access to all intelligence sources to combat fraud and corruption;
- Operate a Whistleblowing policy to ensure concerns of internal probity can be raised and this policy is operated in accordance with the Public;
- Disclosure at Work Act to ensure protection for those who come forward;
- Prevent fraud from entering the system in the first place by ensuring that all appropriate staff receive fraud awareness training.

### **Anonymous allegations**

This policy encourages staff to raise concerns to be identified in doing so as part of their professional role/responsibility. However, anonymous allegations will be investigated as thoroughly as possible.

### **False allegations**

If staff raise a concern in good faith which is not confirmed by an investigation, no action will be taken. However, if a concern is raised maliciously, disciplinary action may be taken.

### **How to raise a concern**

Staff should normally raise their concerns with a designated manager under the organisations standard procedures for dealing with allegations about a person in a position of trust (this is Chase Grammar School's Principal Dr Paul Silverwood, [prs@chasegrammar.com](mailto:prs@chasegrammar.com), +44 (0)1543 501813 or +44 (0)7496 177633). If the Designated Person is the subject of concern the matter should be referred to a more senior member of Leadership Team or, if this is not possible, the Whistle Blowing Policy can be implemented. Under standard procedures, if there are concerns that an adult working with children may have abused a child, or be unsuitable to work with children and young people, concerns will be passed to the Local Authority Designated Officer (LADO) by the manager.

For further information about the Staffordshire LADO process (Section 4A), please use the following link:  
[Staffordshire Managing allegations](#)



For information about the Stoke-on-Trent LADO process, please use the appropriate link:  
[stoke.gov.uk/Managing\\_Allegations\\_LADO.pdf](https://stoke.gov.uk/Managing_Allegations_LADO.pdf)

In certain circumstances, staff may feel they are unable to follow the organisation's standard procedures e.g. because they feel their position in the organisation would be in jeopardy, they would be subject to intimidation, or that the person of concern is the designated manager to whom they should report such matters and there is no one senior to refer to. They should then follow the Whistle Blowing Policy by contacting a nominated person (the 'responsible person') within the organisation or an umbrella organisation to which the organisation is affiliated (Advisory Board, Chair of Advisory Board Finance and Government Committee in their absence this will default to the Proprietor body Chase Grammar School Limited whose representative is one of the Directors Tong Zhou and Ms Roz Randall SSCB). Policy may also be used in circumstances when the matter has been raised under appropriate organisation procedures for referring child protection concerns, but the referrer considers that the manager has not taken the concerns seriously or acted appropriately with relation to them. In such circumstances, referrers are encouraged to contact the named responsible person for 'whistle blowing' for the organisation or a LADO directly for discussion and advice. The LADO contact details are listed at the end of the policy.

When following the Whistle-blowing Policy, concerns may be shared verbally, but should also be recorded in writing (Safeguarding Whistle Blowing report form – Appendix A).

Staff may wish to invite their trade union representative to be present during any subsequent interviews.

### **How Chase Grammar School will respond:**

Any concern regarding child protection will be referred to external agencies for investigation (children's services, police, LADO). If the concern is not of this nature, there will be:

- Investigation by management;
- Disciplinary process if appropriate;
- Consideration of policies, processes and procedures if such issues arise from the investigation.

Within 10 working days of a concern being raised the referrer will receive a written response from the responsible person which will:

- Acknowledge that the concern has been received;
- Supply information on relevant support mechanisms;
- Advise whether further investigations will take place; or
- Advise that no further action has taken place and why.

### **Who to contact**

In all cases (unless it involves the Principal), you should contact the Principal, Dr Paul Silverwood, with your concerns: E: [prs@chasegrammar.com](mailto:prs@chasegrammar.com); T: +44 (0)1543 501813; M: +44 (0)7496 177633.

The Principal will contact other relevant people for an investigation, such as the Chair of Advisory Committee Business Sub-Committee.

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If you are not able to contact the Principal or you wish to express concerns about the Principal, you should contact the Proprietor, Mrs Tong Zhou (tong@achieve-group.com).

If it is felt that it would be unsafe for any reason to share concerns with the named person from your organisation the you may contact Staffordshire County Council individual designated agency leads for Child Protection, First

Response in the MASH – 0800 1313126 (ask to speak to the duty LADO if your concern is that a member of staff could be harming children)

### **Other support**

Recognised trade unions or professional associations can provide support and assistance or independent, external advice this can be obtained from the charity 'Public Concern at Work' T: 020 7404 6609; E: [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk). For further information please see their website at [www.pcaw.co.uk](http://www.pcaw.co.uk).

Regulatory bodies such as OfSTED will also give advice. OfSTED's Whistleblowing hotline is: 0300 123 3155.

**Whistle Blowing Report Form**

Name: \_\_\_\_\_

Location/department:  
\_\_\_\_\_

Please give a brief outline of your concern? (Please give relevant names, dates, locations etc.)

Were there any other witnesses? If so, please give their full contact details.

Did you take any action at the time? – if so, please outline what action you took.

If you did not take action at the time, please give details as to why you took no action

Signed: \_\_\_\_\_  
\_\_\_\_\_

Date:

## ANNEX J - Prevent Policy

On 1st July 2015 the Counter-Terrorism and Security Act 2015 came into force. The proprietor of Chase Grammar School and the Advisory Committee thus recognise their duty to *"have due regard, in the exercise of their functions, to prevent people from being drawn into terrorism"*. The Act is accompanied by guidance which may be accessed [here](#).

**This is known as the 'Prevent duty'.** In complying with the Prevent Duty, Chase Grammar School recognises the need for an awareness and understanding of the risk of radicalisation in their institution. There is sector-specific guidance for schools and the Department for Education has issued advice (available [here](#)).

Following the publication of the DfE's Prevent Duty guidance available [here](#) schools were advised to update their key policies, highlighting clearly how they implement processes *to identify those pupils who may be vulnerable to radicalisation and the steps they take to prevent exposure to extremist views and political indoctrination*.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

*This policy is the school's response for preventing extremism, radicalization and terrorism.*

### 1. Risk Assessment

Chase Grammar School will assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Staff will follow the Safeguarding Policy. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology, however staff have received training and will inform the DSL of any concerns they have. The DSL will liaise with the Staffordshire Prevent Coordinator on 01785 232054 sharing any concerns and following any advice.

### 2. Working in Partnership

Chase Grammar School recognises the Prevent Duty builds on existing local partnership arrangements. The Local Safeguarding Children Board (LSCB) are responsible for coordinating what is done by local agencies for the purpose of safeguarding and promoting the welfare of children in their local area. Chase Grammar School will work with Staffordshire Safeguarding Children's Board to seek advice, support and guidance drawing on multi-agency expertise, to support pupils at risk of harm via social media and the use of the internet. In addition, CGS will consider engagement with parents and carers to assist families who raise concerns and provide them with appropriate support.

### 3. Staff Training

In June 2015 Moira Simpson, Designated Safeguarding Lead (DSL), undertook Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. In September 2015 the DSL led a Training Day at CGS for staff on the new legislation and Prevent Duty. In December 2015 all staff were given a bulletin informing them of the Prevent Duty and to contact the DSL with concerns. From September 2016, all new staff joining Chase Grammar School will complete a short online awareness course delivered as part of the 'Channel' multi-agency programme. The course enables school staff to obtain a certificate upon completion. The certificate should be printed and placed on the member of staff's file. The course is available on-line:

[http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html).

All staff will complete this course before the end of December 2016. Further information and guidance on the Channel programme can be viewed here:

<https://www.gov.uk/government/publications/channel-guidance>.

Chase Grammar School recognises the importance that staff are trained on how to identify factors that can help make people vulnerable to radicalisation. For example, monitoring all pupil absences and promptly addressing concerns about irregular absence with the parent or carer. As part of prevention, staff will receive focused training to support the ever changing landscape of safeguarding which is underpinned by legislation and guidance on issues such as radicalisation.

### 4. IT Policies

Chase Grammar School acknowledges the need to ensure that children are safe from terrorist and extremist material when accessing the internet in school. Chase Grammar School has bought *Smoothwall* to ensure that suitable filtering is in place. Chase Grammar School, through its curriculum and more specifically Lifeskills programme, helps equip pupils with the skills and knowledge to stay safe online, both in school and outside. E-Safety is already an integral part of the Chase Grammar School's Lifeskills curriculum.

### 5. Practical Steps

To comply with the Prevent Duty, Chase Grammar School will:

- Conduct a risk assessment to assess the likelihood of pupils being drawn into terrorist organisations including extremist ideas, to demonstrate an understanding of the risks and how to identify children who may be at risk of radicalisation and what to do to support them. This should form part of an overall risk assessment, rather than a separate activity;
- Review the school's Safeguarding Policy to include reference to the Counter-Terrorism and Security Act 2015 and the Prevent duty;
- Review other relevant policies which may be affected by the Prevent duty including the school's Countering Bullying Policy, Visitors Policy and Bookings & Lettings Policy;
- Continue to work in partnership with the SSCB;
- Ensure there is regular staff training to raise awareness on how to protect children who may be vulnerable to radicalisation or exposed to extremist views;
- Review the school's IT policies to ensure children are protected on-line at school. This will make reference to the Department for Education's new guidance, accessible [here](#), on how terror organisations are using social media to recruit young people.

**ANNEX K: KEEPING CHILDREN SAFE IN EDUCATION 2016**