

SAFEGUARDING POLICY

Applies to Prep, Pre Prep and EYFS

Reviewed and approved:	February 2019
Next Review due:	February 2020
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PART ONE

School's Aims and Ethos

Saint Ronan's School is committed to safeguarding and promoting the safety and welfare of every child at the School and acting in the best interests of each child to enable all children to have the best outcomes. This is the responsibility of the whole School, including all staff, volunteers and Governors. The School aims to provide an environment in which children feel secure, their viewpoints are valued, are encouraged to talk and are listened to.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's health and development – physical, mental and emotional; ensuring children grow up in circumstances consistent with the providing of safe and effective care; and taking action to enable all children to have the best outcomes.

The School recognises the contribution it can make to safeguard and support the children in its care through Prevention, Protection and Support:

Prevention

- Follow procedures to prevent unsuitable people working with children as set out in the Safer Recruitment Policy (appended).
- Create a positive and emotionally safe school atmosphere with careful and vigilant teaching; providing good adult role models.
- Have safeguarding at the heart of the school with all staff and children fully involved in strategies and development and offering a wide range of support to children.
- Establish a culture where children know how to keep themselves safe (in the real and virtual world), know who to talk to when concerned and are listened to.
- Provide opportunities to discuss and understand a full range of safeguarding situations through PSHEE, Circle Time, the curriculum and activities in and outside of the School.
- All teaching staff are trained in Safeguarding and Prevent (College of Policing Channel General Awareness),

Protection

- Follow agreed procedures to identify and report concerns that a child is at harm or at risk of harm.
- Ensure staff are trained and supported to identify and respond appropriately and sensitively to all safeguarding and child protection concerns.

Support children and staff who have concerns or who may have been abused

- Recognise the emotional, social and academic impact of abuse or witnessing abuse and find appropriate support.
- Recognise the role of the School in being a stable and safe environment and provide appropriate support and training.

All children have a right to be protected. Child abuse is no respecter of class or wealth, race or religion. People who abuse children can be from any section of society, often appearing quite ordinary, respectable and caring. This makes it very difficult for the children they abuse to be believed. Within a professional, close community like the Saint Ronan's School, where people dedicate their lives to caring for and educating children, it can be difficult to appreciate that some people neglect or seek to harm children, even their own, or to use them for their own sexual gratification. Teachers and other school staff are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop, because they have daily contact with the children. The School recognises its important role in the early recognition of the signs and symptoms of abuse or neglect and the appropriate referral process.

This policy serves to minimise harm, or risk of harm, and to specify action in clear procedures of which all staff are made fully aware. All staff have a responsibility to ensure that children in their care are not harmed. There is no legal duty to report suspicions of abuse. However, in order to fulfil the statutory duty to safeguard children as set out in the Education Act 2002, it is not possible to protect a child without reporting abuse or suspicions of a child at risk of harm. Also, there is a professional obligation to do so and a lack of action could constitute criminal neglect.

The following policy follows guidance from the Department for Education, Local Authority Child Services, Kent Safeguarding Children Board, ISI, BSA and IAPS. The policy applies to all employees and volunteers at Saint Ronan's School: teaching, non-teaching, boarding, peripatetic, temporary, and Governors.

The purpose of this policy is to:

- Ensure child protection concerns are handled sensitively, professionally and in ways that support the needs of the child.
- Inform all staff, parents and governors about the School's responsibilities
- Enable everyone to have a clear understanding of safeguarding and child protection issues and their responsibilities in identifying children in need of early help, safeguarding and child protection support and following procedures.
- To follow the procedures set out by:
 1. Kent Safeguarding Children's Board (KSCB),
 2. Keeping Children Safe in Education, 2018,
 3. Working Together to Safeguard Children, 2018,
 4. Dealing with Allegations of Abuse against Teachers and other Staff, 2012,
 5. Sexual Offences Act, 2003,
 6. Sexual Violence and Sexual Harassment between children in Schools and Colleges, 2018,
 7. Counter Terrorism and Security Act, 2015,
 8. Serious Crime Act, 2015,

9. Information Sharing, 2018

- **To have regard to the statutory obligations placed on us by:**

1. Section 175 and section 157 of the Education Act 2002,
2. Disqualification under the Childcare Act 2006, updated 2016,
3. What to do if you're worried a child is being abused, 2015, updated 2017,
4. Prevent Duty Guidance for England and Wales, 2015,
5. The Prevent Duty: Departmental advice for schools and childminders, 2015,
6. The use of social media for online radicalisation, 2015,
7. Mental Health and Behaviour in Schools, 2016,
8. Counselling in schools: a blueprint for the future, 2016.

The School observes the Boarding Schools National Minimum Standards (April 2015) and the requirements of the Early Years Foundation Stage statutory framework.

This policy is reviewed regularly and updated and amended, as necessary and at least Annually. All updates are shared at termly INSET training or via e mail in the interim.

Where boarders are referred to, it includes all children who are accommodated at the school e.g. overnight accommodation

This policy extends to organisations the School works with offsite and to any staff employed by another organisation and working with the School's pupils on another site. Assurance is obtained by the School that appropriate child protection checks and procedures are in place.

This policy covers all types of abuse: physical injury, physical neglect, emotional abuse, sexual abuse and exploitation and other forms of abuse. The School has additional policies and guidance regarding Bullying (including Sexual Bullying and Cyberbullying), Mental Health and Extremism. Recent updated guidance around Peer on Peer abuse and harmful sexual behaviours is reflected in this and other linked policies.

MANAGEMENT STRUCTURE AND RESPONSIBILITIES WITHIN THE SCHOOL COMMUNITY

All schools must nominate a senior member of staff to coordinate child protection arrangements and this person is named in this policy guidance. The Designated Safeguarding Lead is a member of the School Leadership Team in line with the requirements of KCSIE. The School ensures that the Designated Safeguarding Lead or a Deputy will be on site at all times that the School is functioning.

Chairman of the Governors	Colin Willis
Safeguarding Governor	Simon Bennie
Headmaster	William Trelawny-Vernon
Designated Safeguarding Lead (DSL):	Emma Trelawny- Vernon
Deputy DSL Prep School	Ross Andrew
Deputy DSL Pre Prep and EYFS	Andrea Bright

The Role of the Safeguarding Governor

- Oversee the Schools' Safeguarding Policy and practice and ensure that the Policy is reviewed annually and signed by the Chairman of the Governors
- To ensure that an annual report, compiled by the DSL is made to the Governing Body and then send to the Kent Education Safeguarding Team.
- To chair the Welfare subcommittee which will review safeguarding and child protection every term and on request in between times.
- To assess the efficiency with which the related duties have been discharged.
- To ensure that any deficiencies or weakness in safeguarding are remedied without delay.
- To monitor systems of online security.
- To determine whether there are any improvements to be made to a school's procedures or practice following a substantiated allegation against a member of staff.
- To ensure that the DSL should have regular reviews of her own practice and provide opportunities to discuss any concerns about welfare and safeguarding matters.

Role of the Headmaster

- To ensure that the Safeguarding Policy and procedures are implemented and followed by all staff
- To allocate sufficient time and resources to enable the DSL and deputies to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings
- To ensure that staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing policy.
- Ensure that the children's safety and welfare is addressed through the curriculum.

The Role of the Designated Safeguarding Lead.

The DSL is a member of the Senior Management Team and is given authority, resources and time in order to fulfil the role.

Raise awareness across the school:

- Ensure that all staff and the Headmaster (teaching and non-teaching, part time, temporary, volunteer), parents and governors know who the DSL is and what their responsibilities are.
- Brief all school staff and the Headmaster (teaching and non-teaching, part time, temporary, volunteer) on the relevant contents of the guidance and procedures they must follow as specified in this document – including the briefing of new staff and Governors as part of their induction at the school.
- Ensure that all staff and the Headmaster (teaching and non-teaching, part time, temporary, volunteer) understand their responsibilities in being alert to and acting appropriately in cases of or suspected cases of abuse.
- Ensure that the Headmaster is kept informed of any concerns.
- Act as a source of support and expertise to the School community.
- Review and update the policy annually and when new legislation is issued.

- Make this policy available to staff, volunteers and parents and ensure it is posted on the school website.

Coordinate, deliver, record and assess training:

- Keep a record of all staff training: safeguarding INSET, annual updates, training in response to changes to local and national guidance, or changes in policy
- Ensure that all staff have read and understood KCSIE (Part 1 and Annex A) September 2018.
- Deliver support staff and Governors' Induction and statutory training
- Provide statutory training for all staff and the Headmaster (teaching and nonteaching, part time, temporary, volunteer) and Governors every three years.
- Receive appropriate training approved by Kent Safeguarding including the LA specialist Inter agency Working Together and Child Protection Training every two years, or when new legislation is introduced, and ensuring that this training is disseminated to all others in the school in line with statutory requirements.
- Ensure the Deputy DSLs have the LA Specialist Inter agency Working Together and Child Protection training every two years
- Assess staff training needs regularly through testing staff understanding of policy in practice.

Online Safety:

- Safeguarding includes online safety and the DSL and Deputies must ensure that they are trained adequately to be able to advise and guide school staff and policy in this area.

SEND:

- Safeguarding includes SEND and the DSL and Deputies must ensure that they are trained adequately to be able to advise and guide school staff and policy in this area.

Keeping up to date on new local and national guidance and regulations:

- Hold relevant documentation and guidance including the School's copy of "Working Together: a guide to arrangements for inter-agency co-operation for the protection of children from abuse" and KCSIE, September 2018
- Develop and maintain effective links with external agencies.

Work with Governors:

- Attend a termly meeting with safeguarding governor preceding the Governors' meeting to provide information for Governor review.
- Attend the three annual safeguarding sub-committee meetings.
- Ensure that the Governing Body undertakes an annual review of the School's child protection policies and procedures and of the efficiency with which the related duties have been discharged.
- Provide an annual safeguarding report to the Governors which is sent to the Kent safeguarding team within the required timeframe.

Management of Safeguarding and Child Protection concerns:

- Develop effective working relationships with other agencies and services and cooperating as required with enquiries of a child protection nature or safeguarding.

- Keep written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file.
- Decide whether to take further action about specific safeguarding (not child protection) concerns e.g. discuss with Educational Safeguarding Team, Early Help, LADO, talk to parent, find suitable support, use Early Help Assessment (EHA), refer to Child Services.
- Make referrals as appropriate, following guidance on further action.
- Submit reports to and attend child protection conferences
- Coordinate the School's contribution to child protection plans.
- Inform Early Years and Family Support if a child, who is in receipt of a Child Protection Plan, has unexplained absence of more than 2 days.
- Ensure that when a child with a child protection plan leaves the school, their information is passed to their new school and the child's social worker is informed.
- To ensure that when a child moves to a new school, in addition to the transference of the Child Protection file, the DSL should share information proactively with the new school to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of their needs.
- Ensure the School effectively monitors children who have been identified as "at risk"
- Provide guidance to parents, children and staff about obtaining suitable help.
- Attend multi-agency briefings.
- Follow guidance on reporting and tracking lost/missing children and removing children from the admission register.
- Ensure safe recruitment practices are always followed and staff/volunteers are selected and recruited following appropriate safe recruitment processes detailed in the Safer Recruitment Policy (appended)
- Review child protection procedures and remedy any weaknesses immediately.
- The DSL should consider the context within which any incidents or behaviours occur. This is known as contextual safeguarding where assessment of children should consider whether environmental factors that are present in a child's life are a threat to their safety or welfare

Role of the Deputy DSL

- Deputise in the absence of the Designated Safeguarding Lead and to be trained in all areas to the same level as the DSL.
- Support and liaise with the Designated Safeguarding Lead in all matters regarding safeguarding and child protection
- Receive specialist training from KSCB every 2 years.

Role of the EYFS DSL

- Liaise with the Designated Safeguarding Lead on all matters regarding safeguarding and child protection
- Receive specialist training from KSB every 2 years.

Role of All Staff and Governors

Safeguarding is everyone's responsibility, including senior management, academic, pastoral, non-teaching, health, support, part-time staff; volunteers and Governors.

- Implement and follow the guidance within this policy

- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- Provide a safe environment in which children can learn. 'Safe' includes a feeling of emotional safety and the promotion of positive emotional health.
- Identify children who may be in need of early help or who are suffering, or likely to suffer, significant harm, and report their concerns
- Welfare concerns must be escalated to the DSL within 24 hours
- Be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label
- Recognise that the DSL (and deputies) are most likely to have a complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns
- Ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral.
- Recognise that for children who have special educational needs and/or disabilities (SEND) and children who speak English as an additional language (EAL), additional barriers may exist when recognising neglect. This includes assumptions that indicators of potential abuse (behaviour, mood, injury) relate to the child's disability without further exploration. These children may be disproportionately impacted by issues such as bullying without outwardly showing any signs. There may be communication barriers and children may have difficulty overcoming them.
- Take appropriate action and work with other services as required
- Attend induction, termly and statutory 3 year safeguarding training
- Read Part 1 and Annex A of Keeping Children Safe in Education 2018 and confirm they have read and understood it.
- Follow the staff Code of Conduct as contained in this Policy.
- To accept the fact that "it could happen here"

How do we support staff to fulfil their duties:

- Termly safeguarding training
- Weekly safeguarding updates in the Staff meetings and Senior Management Team meetings
- Ease of reporting via Green forms.
- "I have a concern" button by which children can directly access help
- AS tracking which may highlight concerns
- Close liaison between Pastoral Heads and DSL
- Information regarding safeguarding made available in staff handbooks

ABUSE

Identifying abuse:

At Saint Ronan's we want every pupil to feel safe and protected from neglect and abuse or to know that there is someone they can turn to. All staff have a duty to protect children from harm and this duty applies to everyone working in this school:

The child's wishes

Where there is a safeguarding concern, teachers, governors and school leaders should ensure the child's wishes and, feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the **best interests** of the child at their heart.

Types of abuse and neglect

All School staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff should be considering the context within which such behaviours occur. There may be wider environmental factors in a child's life which are a threat to their safety and/or welfare.

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm means ill treatment or the impairment of health or development. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children. A child is defined by the Children Act 2004 as someone who has not reached their 18th birthday

Peer on Peer Abuse

A third of child sex abuse is carried out by other children.

Peer on peer abuse can include different forms of abuse:

- Inappropriate sexual play
- Harmful sexual behaviour
- Sexting
- Grooming
- Child sexual exploitation
- Bullying
- Gender based bullying, initiations, sexual violence

It can be physical, verbal or emotional.

All sexualised behaviour of children is taken seriously.

Abuse must not be passed off as banter, nor as part of growing up.

Specific differentiation will be made for children with additional needs.

All incidences of Peer on Peer abuse must be reported to the DSL

The response to any peer on peer incident must be to follow the Green Form and recording process. Consultation with KSCB will be undertaken as appropriate.

Support will be given to both perpetrator and victim as all children involved can be seen to be "at risk".

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

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

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

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

What staff should be alert to**Observation of indicators**

There are many signs that may indicate a child is suffering abuse or is at risk of abuse. If you have any concerns about a child talk to the DSL. Staff must regularly familiarise themselves with the detailed list of indicators in Annexe B of this policy. The following list, although not exhaustive, should cause a member of staff to be concerned. When there are any safeguarding or welfare concerns about a child, staff must put the interests of the child first and report concerns to the DSL immediately.

Staff should be concerned about a child if any of these overriding indicators are observed:

- Significant change in behaviour, performance or attitude
- Concerns about outward appearance – clothing, hygiene, equipment, possessions
- An injury which is not typical of the bumps and scrapes normally associated with children's injuries
- Frequent or regular injuries (whether or not reasonable explanations are given)
- Confused or conflicting explanations on how injuries were sustained
- Sexual behaviour which is unusually explicit and/or inappropriate to the child's age
- Disclosure of an experience in which s/he may have been significantly harmed or been at risk of harm
- Conduct of a parent or carer
- Conduct of an adult in school
- Rumour and Hearsay
- Displays one or more of the indicators listed in the policy.

It is important to report to the Safeguarding Team any concerns even if there are no specifically listed indicators present.

Sexual Violence and Sexual Harassment between children

Sexual violence and sexual harassment can occur between two children of any age and gender. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

All reports of sexual violence and sexual harassment must be reported to the DSL immediately and recorded using the Green form.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable.

It is important that all victims are taken seriously and offered appropriate support, though it should be noted that current evidence has shown overwhelmingly that girls are more likely to be the victims of such abuse or harassment and boys the perpetrators.

All staff must make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up, 'having a laugh', 'boys being boys', or banter of any kind.

All staff must challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children with additional needs and SEND are three times more likely to be abused than their peers.

Sexual harassment

This is understood to mean 'unwanted conduct of a sexual nature' that can occur online and offline.

Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes;

Online sexual harassment

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two.

Harmful sexual behaviour should be considered in a child protection context and must be reported immediately to the DSL

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Children displaying harmful sexual behaviour have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

'Sexting' - Youth Produced Sexual Imagery

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.

They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages.

What the law states:

Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- *Take an explicit photo or video of themselves or a friend*
- *Share an explicit image or video of a child, even if it's shared between children of the same age*
- *Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created*

What to do when an incident involving youth produced sexual imagery comes to the school's attention:

- If possible, the device involved should be confiscated and set to flight mode, or if not possible, switched off
- The incident must be referred to the DSL as soon as possible
- The DSL should hold an initial strategy meeting with appropriate staff
- There should be subsequent discussions with the pupils involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm
- At any point in the process if there is a concern a child has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Mental Health Concerns

The School views child mental health concerns (eg anxiety, low mood, eating disorders, self harm) as safeguarding issues and support is provided through the Safeguarding Team and the wider Pastoral Team around the individual child and family. All concerns about a child's mental health must be reported to the DSL. A strategy discussion will agree upon next steps and consideration will be given to Early Help and referral to external professionals. All steps will be discussed with the child, parents and carers, and will take in to consideration the wishes and age of the child

Mental Health difficulties and Substance Abuse within the family

Family member substance abuse can lead to neglect, an unsafe house e.g. dealers visiting, increase the risk of child substance abuse and put the child at risk of other forms of abuse.

Other mental health difficulties within the family can similarly impact on children and cause significant Safeguarding and Child Protection concerns.

Staff must escalate any concerns or information they have in this regard, to the DSL immediately

Domestic violence and abuse

This is defined as “any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by those aged 16 or over who have been intimate partners of family members. This can encompass, but is not limited to: psychological /emotional abuse- intimidation and threats, social isolation, verbal abuse, constant criticism, enforced trivial routines. Physical violence- slapping, pushing, kicking, punching, stabbing, damage to property or items of sentimental value, attempted murder or murder. Physical restriction of freedom- controlling who the victim or children see or where they go, what they can do, stalking, imprisonment. Sexual violence or financial abuse- stealing, depriving or taking control of money etc. Domestic violence can be perpetrated by men to women and vice versa, can occur within same sex relationships and to/from a child to an adult. Children’s exposure to adult conflict, even when violence is not present, can lead to serious anxiety and distress. It can also have a serious impact on a child’s development and emotional wellbeing. Consideration must also be given to young people who may themselves be in a violent relationship and be suffering or likely to suffer significant harm.

Staff must escalate any concerns or information they have in this regard, to the DSL immediately

Child Sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money, or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly “consensual” relationship where sex is exchanged for affection or gifts, to serious organised crimes by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of abuse. Child Sexual exploitation does not always involve physical contact and can happen online. **Child Sexual exploitation is never the victims fault, even if there is some form of exchange.**

Staff must escalate any concerns or information they have in this regard, to the DSL immediately

Honour based violence (HBV): So-called “honour-based” violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as

breast ironing. All forms of HBV are abuse (regardless of the motivation). If a member of staff has a concern about HBV they should activate local safeguarding procedures.

Forced marriage: Forcing a person into marriage is a crime in England and Wales. Staff can contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or email fmv@fco.gov.uk

Female Genital Mutilation (FGM) Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of female genital mutilation (FGM). Victims of FGM are likely to come from a community that is known to practise FGM. Girls at risk of FGM may not be aware of the practise or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Whenever there are concerns about the imminent possibility that FGM is about to take place, or that it has already taken place, the School will activate local safeguarding procedures with Police and Children's Social Care. From October 2015 there is a new professional duty for all staff to report cases of FGM in girls under 18 to the Police using the 101 service. The report must be made as soon as possible (within 24 hours) and the DSL must be informed. The duty to report is a personal duty.

Gangs/ youth violence including initiation/ hazing- The School recognises the risks posed to children in relation to involvement in gang related activity which may be street gang, peer group or organised crime. Young people who are involved in gangs are more likely to suffer harm themselves, through retaliatory violence, displaced retaliation, territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of initiation of hazing practises. The School understands that Early help can be crucial in the early identification of children who may need additional support due to gang related activity and as such will provide an Early help response when concerns are raised about indicators of gang activity. If information suggests a child may be at risk of significant harm, due to gang related activity a referral will be made.

Radicalisation/Extremism

Schools are well-placed to intervene to protect children from the risk of radicalisation and during the process. This refers to all forms of radicalisation to extremism including right wing, religious and gangs.

Identifying Pupils at Risk

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. In order to fulfil the Prevent duty, it is essential that staff are able to identify children who might be vulnerable to radicalisation, and to know what to do when they are identified. There are various factors which can put young people at risk such as:

- Peer pressure
- Influence from other internet users
- Bullying
- Family tensions

- Lack of self-esteem or identity
- Desire for status, excitement or adventure
- A need to dominate or control others
- Personal or political grievances
- Race or hate crime

Signs of Radicalisation

All staff have a duty to look out for and to report any action or expression of views which suggest that pupils are being radicalised or drawn into terrorism.

Such views might concern:

- Beginning to express and interest in exploring extreme views
- Carrying out internet searches into areas concerning terrorism showing support, either vocal or active, for extreme political ideologies and or organisations
- Showing support for extreme religious views and organisations

Views could be displayed in class, in discussion in boarding, in conversations with teachers or peers, in year group assemblies or elsewhere. Effective engagement with parents/ the family should be considered as they are in a key position to spot signs of radicalisation. The School will discuss concerns in relation to possible radicalisation with a child's parents unless doing this would put the child at risk.

PREVENT is part of safeguarding; similar in nature to protecting children from other forms of harm and abuse. There is a duty to report suspicions or radicalisation through Channel. The School's use of 'E-Safe' to monitor on-line behaviour allows for appropriate concerns to be identified in respect to the Prevent duty.

- The Prevent Governor is Simon Bennie
- The Prevent Officer is Emma Trelawny-Vernon, DSL

The Counter Terrorism & Security Act, 2015, places a duty upon schools and specifies they must have "due regard to the need to prevent people from being drawn into terrorism".

Staff must report any concerns they have around the PREVENT duty to the DSL and consideration will be given to the appropriateness of a referral to Channel.

Further information about how Saint Ronan's actively promotes core British Values can be found in our SMSC and PSHEE policy and all departmental schemes of work and detail of the management of how speakers are vetted can be found in the Visitor Policy.

Children Missing Education (CME)

The School follows the procedures laid out in 'Keeping Children Safe in Education' (Dept. for Education September 2018) and 'Children Missing Education' (Dept. for Education statutory guidance for local authorities September 2016).

Unusual non-school attendance, missed appointments, or a history of frequent moves, may indicate that a child is at risk. In order to monitor children who fall into this category the school will:

- Record daily attendance
- Contact the child's parent/carer if no explanation is given as to absence
- Request a doctor's note for prolonged illness
- Request school records from the child's previous school
- Complete a handover process to the child's next school
- Report after 5 days to the Local Authority (LA) if a child is absent without reason from school
- Report after 5 days to the LA if a child leaves the school with no forwarding school (or with no forwarding address)
- Report after 2 days to the LA a child in receipt of a Child Protection Plan who has unexplained absence
- Report to the LA any child joining or leaving the school at a point outside the usual year or entry or leaving. The usual points of joining are Reception and leaving are Year 8.
- The DSL will meet Matron at the half way point and end of each term to review absences in the School and follow up concerns accordingly.

Staff must report all welfare concerns around CME to the DSL

Private Fostering

The School is required to notify the Local Authority of any private fostering arrangements. Private fostering happens when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made by a parent and a carer for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

PART 2 SCHOOL PROCEDURES

Recording

- All concerns, discussion and decisions and reason for decisions must be recorded, dated and signed/attributed.
- All safeguarding records are kept confidential and shared only on a need to know basis.
- Safeguarding records are kept securely and away from a child's main school file.
- Forms and others concerns are reviewed weekly to track and monitor progress.

Where should staff record concerns?

Staff should record all incidents via a Green Form.

MEETING CHILDREN'S NEEDS AND TAKING ACTION

The importance of recognising children who may need Early Help

Staff are asked to contact a member of the Safeguarding Team if they have concerns about children who may be in need of Early Help so that support can be provided and issues addressed. A pre-emptive approach is desirable to prevent smaller issues turning into bigger problems.

Information on Early Help, prevention and statutory services for everyone working with children is available from the Kent Safeguarding Children Board web page below:

www.kelsi.org.uk

Staff should always bear in mind that additional barriers can exist when recognising abuse and neglect in pupils with additional needs or SEND. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury
- relate to the child's disability without further exploration
- The potential for children with children with SEND being disproportionately
- impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

What staff should do if they have welfare concerns about a child

Child In Need and Early Help

All staff are to be alert to children who may require Early Help, paying particular attention to EAL and SEND children.

Staff should report a concern even if they do not have proof that their concern is justified.

- If any member of staff is concerned about a child s/he must inform the DSL on the same day.

- The member of staff must record and report information on a Green Form and bring it to the DSL.
- It is the responsibility of the DSL to escalate if appropriate and ensure detailed records are maintained.
- **External help.** When you have a safeguarding concern about a pupil you need to talk to the DSL or you can go straight to external agencies. There are several levels of help available depending on the degree of the need the pupil has.

Kent County Council provides services with four tiers to support children.

Tier 1 Universal services

Children are supported by their families and universal services meet their needs. Universal services include parenting, health and education.

Tier 2: Additional Services

If any member of staff has a concern about a pupil's safety or welfare, or considers a pupil could benefit from some form of intervention to prevent harm happening, he/she must act in the pupil's interests to seek help, usually by discussing the concern with the DSL who will then seek support from other agencies as necessary. Staff may be required to support other agencies in an assessment. Cases must be kept under review and consideration given to a higher level of referral if the child's situation does not improve.

At this level, the pupil is unlikely to qualify for Early Help provided by the local authority (LA), but the DSL will speak with the LA and ask if there are any services which the pupil and/or her parents can access. Staff should be alert to the potential need for early help for a pupil who:

- Is disabled and has specific needs
- Has special educational needs
 - Is showing signs of being drawn into anti-social or criminal behaviour
 - Is misusing drugs or alcohol
 - Is living in difficult circumstances at home
 - Is at risk of being radicalised or exploited
- Is showing early signs of abuse or neglect.

Tier 3: Child in Need referral to Integrated Front Door

Where intensive or specialist support is needed, including Early Help, the Single Request for Support Form must be completed. A child in need is defined as one who is unlikely to achieve or maintain a reasonable level of health or development, or whose development is likely to be significantly or further impaired without the provision of services. Children in need may be assessed under section 17 of the children Act 1989

Tier 4: Child at Risk: referral to Integrated Front Door

If there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the local authority and other organisations have a duty to make enquiries under section 47 of the Children Act 1989. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. With all referrals via the Front Door, the case will be assessed and there will be some form of

screening by a Duty Senior within 24 hours. Following that there are three likely outcomes:

- I. Pupil referred back to school for school or universal services support and referral is closed
- II. Pupil meets the criteria for a 'child in need' and is offered Early Help or Statutory Social Care such as 'Team around the Family' support
- III. Pupil meets the child protection criteria and the Kent Child Protection Procedures will be invoked

An Early Help Assessment (EHA) will be offered for a child and family who may benefit from a co-ordinated support from one or more agency. If no consent is given to share an EHA the DSL will contact KSFB for advice and then escalate to Children's Services if appropriate

Pupil in Danger or at Risk

Where a child is suffering, or is likely to suffer harm, an **immediate** referral to children's social care and, if appropriate, the police, must be made. Staff can go direct or via the DSL to Kent County Council Front Door for children's social care. Parental consent is not required for a referral.

- office hours tel. **03000 41 11 11**
- email social.services@kent.gov.uk
- out-of-hours and emergency tel. 03000 419191
- www.kelsi.org.uk contains the current route to the Front Door but this will move to www.theeducationpeople.org at some stage this year.

The Police tel. 999 must be contacted if a crime has been committed.

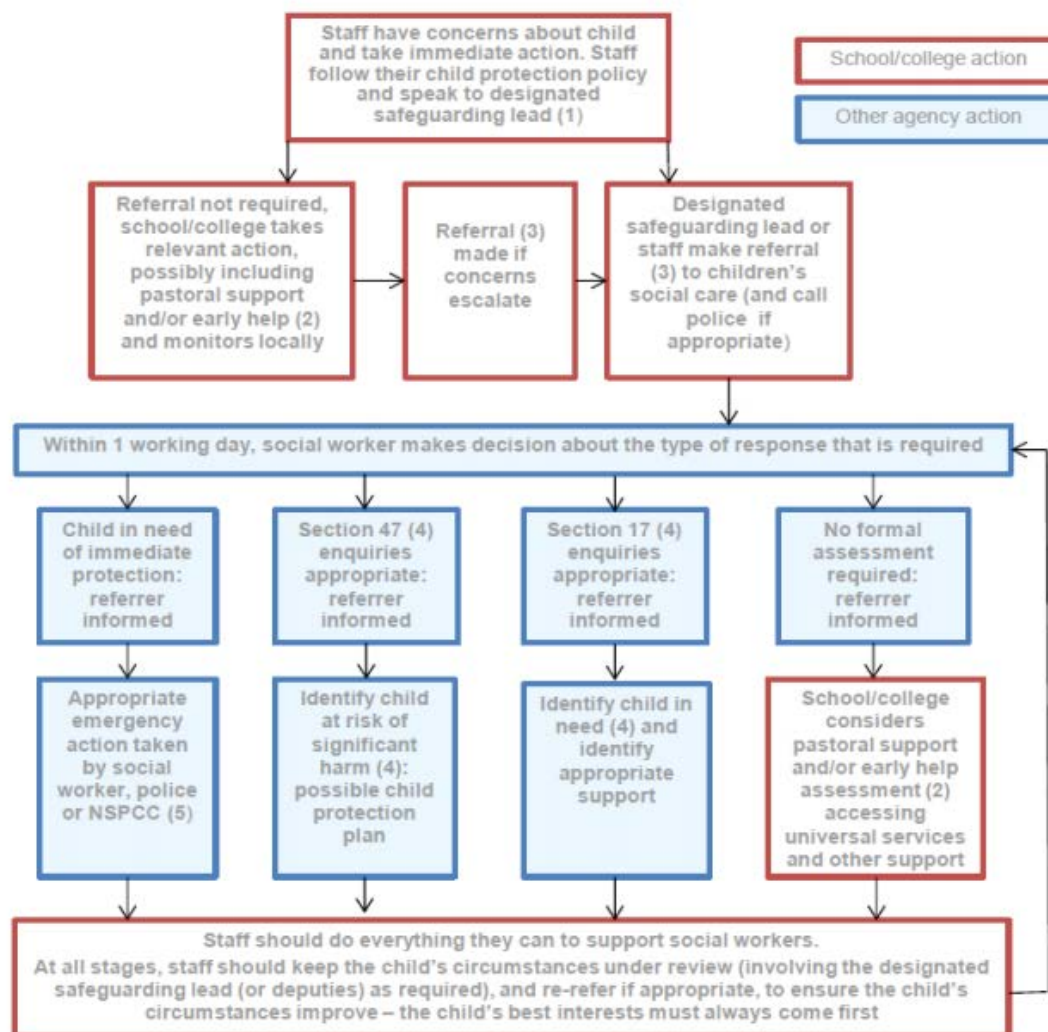
The referral is usually made by the DSL, though anyone can make a referral and should inform the DSL as soon as possible if they have done so. Emergency referrals to external agencies do not require parental consent. Section 17 (a child in need) and section 47 (a child is suffering or likely to suffer significant harm i.e. child at risk) must always be reported to the DSL or external services. If the DSL is not available, this should not delay appropriate help being sought.

All concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. Staff should discuss what kind of records they need to keep with the DSL.

If, after a referral, the child's situation does not appear to be improving, the referrer should ask the local agencies for a review to ensure the child's situation continues to improve.

KCSIE provides the chart below which can help with deciding which route you/ and the DSL must follow.

Actions where there are concerns about a child



Support with identifying child abuse

Significant harm can take a variety of forms. It could be physical, emotional or sexual abuse, or it could also manifest as neglect (eg failing to act to prevent harm to a child). Sometimes a number of issues may present at the same time. Examples may include:

- Abuse by an adult or adults
- Abuse by another child or children (peer on peer abuse)
- Abuse by people known to or not known to the child
- Real world settings – in a family, institution or community
- Virtual world settings – eg via gaming platforms or social media sites

Further information is provided for staff in the detailed list of indicators of abuse in Appendix B.

What staff should do if they have Child Protection concerns about a child

Staff (including volunteers) working for or on behalf of the School are required to report any concerns about a child suffering or being at risk of suffering significant harm (whether in or outside the School) to the DSL immediately.

Staff must not agree confidentiality with the child and must always act in the best interests of the child.

The School will always take into account the child's wishes and feelings when determining what action to take and what services to provide to protect individual children, through ensuring that there are appropriate systems in place for children to express their views and give appropriate feedback.

What staff should do if they have concerns about the conduct of another member of staff or volunteer (see Appendix: Managing Allegations against staff)

Allegations of Abuse:

- If a child or parent makes a complaint about a member of staff, the person receiving the information must take it seriously and immediately inform the Headmaster. Similarly if a member of staff hears of, or sees, conduct of a member of staff that causes concern, he/she must inform the Headmaster immediately. The Headmaster will inform the LADO. In the absence of the Headmaster, allegations against staff must be reported to the Chair of Governors and the Chair will inform the LADO.
- This procedure includes volunteers, who are treated the same way as staff.
- If the concerns are about the Headmaster or the DSL in the case of Saint Ronan's School, immediately inform the Chair of Governors (without informing the Headmaster first) who in turn will contact the LADO and follow the advice given.
- Alternatively you can contact the LADO who in turn will contact the Chair of Governors.
- AN allegation against the Chairman of the Governors should be reported directly to the LADO.
- Any member of staff who has reason to suspect that a child may have been abused by another member of staff, either at school or elsewhere, must immediately inform the Headmaster. He or she should also make a record of the concerns including a note of anyone else who witnessed the incident or allegation. The Headmaster will refer to the LADO. The DSL and LADO will ensure that the child is safe.
- The Headmaster will not investigate the allegation himself, or take written or detailed statements, but will consult with the LADO and follow the advice given. If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, it will be necessary to liaise with the police at the outset - before informing the member of staff.
- The School would consider precautionary suspension, without prejudice, of staff during any police or Department for Education child protection investigation involving them. This procedure includes provision for guidance and support to staff during suspension or investigation while allegations against them are being investigated.
- The School will consider informing the Teaching Regulation Agency (TRA), previously the NCTL, of any staff member or adult who resigns or is dismissed in circumstances which may render them unsuitable to work with children or young people, where a prohibition order may be appropriate. The reasons for such an order being considered are: unprofessional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.
- Schools have a legal duty to refer to the DBS anyone who has harmed, or pose a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and that the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

- When it is decided that it is not necessary to refer (usually in consultation with the LADO), the Headmaster will consider whether there needs to be an internal investigation.
- If residential or boarding staff are suspended pending investigation, the School will provide appropriate alternative accommodation.

What staff should do in the event of an allegation against a child

- The allegation should be passed to the DSL immediately.
- The parents of the alleged perpetrator(s) should be told about the allegation as soon as possible if they do not already know of it.
- However, where a strategy discussion is required, or Police and Children's Social Services need to be involved, they should not be informed until those agencies have been consulted and have agreed what information can be disclosed.
- Parents or carers should be kept informed about the progress of the case, including the outcome of any internal discipline process, in all cases where there is not a criminal prosecution.
- Appropriate support, tailored to the needs of the children involved, will be put in place for both victims and perpetrators of peer on peer abuse.

What staff should do if they have concerns about safeguarding practices within the School

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime and that such concerns will be taken seriously by the Senior Leadership Team.
- Appropriate whistleblowing procedures, which are reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the Senior Leadership Team.
- If a member of staff feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Special arrangements for EYFS

- Ofsted will be informed of allegations against any person living or working on the EYFS premises, or of any other abuse alleged to have taken place on the premises.
- The notification to Ofsted will take place as soon as practicable and within 14 days at the latest.

DISCLOSURE – WHAT TO DO IF YOU RECEIVE AN ALLEGATION OF ABUSE

“when a child is being harmed or is at risk of harm”

Disclosure can be verbal or non-verbal. It may be given through a 3rd party – a friend or family member.

Action

The key points to follow if you suspect, or are told of abuse:

1. Receive

- a. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Do not display shock or disbelief.
- b. Accept what is being said and allow the child to talk freely.

2. Reassure

- a. Reassure the child but do not give a guarantee that you will keep what is said confidential or secret. You have a responsibility to tell the right people to protect the child. Explain that you need to tell the people who can sort it out, but that you will only tell people who absolutely have to know. Be familiar with confidentiality as set out in this policy.
- b. Reassure the child that they are not to blame and have done the right thing by telling you.

3. React

- a. Don't ask leading questions that might give your own ideas of what might have happened (e.g. “did he do X to you?”). Ask questions like “What do you want to tell me?” or “Is there anything else you want to say?”
- b. Remember TED - Tell me, Explain to me, Describe to me but do not interrogate for full details.
- c. Avoid criticising the alleged perpetrator
- d. Explain to the child what has to be done next and who will be informed and that you will keep in contact.

4. Record

- a. Write brief notes of what they are telling you straight after the disclosure. Keep these notes (it's what you wrote at the time that may be important later, not a tidier, improved version of it.)

Advice on making notes:

- Do not destroy the original notes in case they are needed by a court
- Record the full name of child, full date and time of conversation, what you have observed and what the child has said to you.
- Record factually any noticeable non-verbal behaviour and the words verbatim used by the child. Do not paraphrase.
- Complete a body map to indicate the position of any bruising or other injury if appropriate
- Record statements and factual observations rather than interpretations or assumptions.
- Remember never to ask leading questions and never try to interview people.
- Sign and date the record
- Hand the document to the DSL as soon as possible and on the same day. The disclosure must be reported to Children's Specialist Services within 24 hours.

5.Report

- a. Immediately tell the DSL (unless they are themselves accused or suspected of abuse. See Allegations Involving School Staff).
- b. Do not tell other adults or young people what you have been told.

Never attempt to carry out an investigation of suspected abuse by interviewing people – Social Services and the Police are trained to do this – you could cause damage and spoil possible criminal proceedings.

Recovery Plan for Children or Staff

Dealing with a disclosure from a child, and a child protection case, is likely to be a stressful experience. The member of staff should therefore consider seeking support for him/herself and discuss this with the DSL.

As every case will be handled with confidentiality (as far as is possible), any child should be able to continue at the school, confident that any incident is not general knowledge. The same will apply for a member of staff in cases of resuming work after an accusation. Counselling may be offered and organised.

CONFIDENTIALITY AND INFORMATION SHARING

All staff and agencies working with Saint Ronan's School will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that information being released into the public domain does not compromise evidence. Information must be shared with the relevant people in order to safeguard a child.

Therefore, the DSL will pass on personal information about a child to other members of staff but on a need to know basis only.

Staff and agencies should only discuss concerns with the DSL.

It should be remembered that information pertaining to child protection and safeguarding can come from any source: the child who is subject of concern, another child, a parent, member of staff, another agency or a person within the wider community.

No one should promise confidentiality to a child or adult as our duty of care is to safeguard the child. Therefore any information that falls in to an indicator of abuse, or concern that a child may be at risk, must be passed on to the DSL. They should however guarantee that

- They will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem
- They will never tell anyone who does not have a clear 'need to know'
- They will take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made

Staff must not publicly speculate about any allegation of (or hint of) a criminal offence against an employee and must not respond to any request from the media, pupils, parents or the public for statements, either written or verbal. Any such requests must be directed to the Headmaster or Bursar.

Child protection information will be stored and handled in line with Data Protection law and the Independent Inquiry into Child Sexual Abuse (IICSA) outcome, 2015. Information about how Saint Ronan's School processes personal data is set out in Saint Ronan's School Privacy Notice.

All documents and information within the school are confidential and must not be shared. In accordance with KCSIE 2018, where children in receipt of a Child Protection File leave the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt is obtained. The receiving school will ensure key staff such as the DSL and SENCOs, are aware as required.

In addition to the child protection file, the DSL may consider if it is appropriate to share any information with the new school in advance of a child leaving. This will only occur where there is a safeguarding need and only once a confirmed placed has been offered and accepted. For example, information that would allow the new school to continue supporting existing additional emotional and mental health needs, difficulties with relationship with food, support for a child who has been the victim of bullying. Information sharing of this kind allows the next school to have support in place for when the child arrives.

PART 3

MINIMISING RISK

Safer Recruitment

The School operates Safer Recruitment procedures and at least one member of a recruitment panel will be safer recruitment trained. Pre-appointment checks are carried out for all staff working for or on behalf of the School (including volunteers, contractors and organisations that support our pupils). This extends to ensuring that written confirmation is received that appropriate child protection checks and procedures have been carried out by the contractor/organisation providing personnel to the School. The School maintains a Single Central Record which is regularly inspected by the Headmaster and the Governor with specific responsibility for Safeguarding.

Further information can be found in the School's Safer Recruitment Policy (appended)

Staff training

Designated Staff for Safeguarding

The Designated Staff receive:

- The Safeguarding Governor, DSL, Deputy DSL have LA Specialist Safeguarding training and this is refreshed every two years.
- Appropriate additional training e.g. Child Mental Health, Early Help, Team Around the Family, Counselling Skills, PREVENT, Online Safety, SEND.

All Staff including the Headmaster, Volunteers and Governors

All staff working for and on behalf of the School (including temporary staff and regular volunteers) need to have an awareness of safeguarding issues:

- The kinds of issues which give rise to safeguarding concerns
- The importance of identifying children who may need early help
- The guidance for identifying child abuse
- Their duty to report concerns and the referrals process
- What to do if a child or adult makes an allegation of child abuse
- The rules about confidentiality

All staff under this heading, including the Headmaster, receive training at a level appropriate to their role to ensure that they are aware of, understand and follow the School's Safeguarding procedures and KCSIE 2018.

On Appointment

All staff working for and on behalf of the School (including temporary staff and regular volunteers) are issued with the following documents and required to read them:

- Part One and Annex A of 'Keeping Children Safe in Education' (Dept. for Education September 2018)
- Safeguarding Policy
- Whistleblowing Policy
- Code of Conduct and Practice (contained in Safeguarding Policy)
- Rewards, Behaviour, Discipline and Exclusion Policy
- Disciplinary and Grievance Procedures
- Staff Use of Social Media Policy
- Personal Use of ICT Facilities Policy
- Use of Cameras and Mobile Devices Policy
- Anti-Bullying, Anti-Sexual Bullying and Anti-Cyberbullying Policy
- Visitors Policy

Contractors are issued with the above as appropriate to the site requirements and pupil contact level with updates as appropriate.

Family members of Boarding Houseparents who are over the age of 16 are DBS checked and are required to sign an agreement confirming the nature of their role and expected conduct in accordance with the requirements of the National Minimum Boarding Standards (April 2015).

Induction, Statutory Training, Updates and Refresher Training

- All members of staff and volunteers attend a face-to-face safeguarding induction with the DSL prior to starting work.
- All members of staff and volunteers attend face-to-face Statutory Safeguarding Training prior to starting work. Statutory Training is refreshed every 3 years.
- All staff and Governors complete online PREVENT training and receive updates on this.
- Thereafter, all staff and volunteers receive updates appropriate to their roles (by email and/or at staff meetings) at the beginning of each term.

Contractors and family members of staff resident in boarding houses also receive safeguarding induction training appropriate to their roles.

All pupils receive on-going safeguarding teaching and have access to online resources, face-to-face work with school staff through PSHEE and Circle time.

External providers working with Saint Ronan's School pupils are checked to ensure they comply with safer recruiting procedures and that their staff are trained adequately in safeguarding. This applies to providers working both on and off-site.

A CULTURE OF SAFEGUARDING (including the Staff Code of Conduct)

All staff should be aware of the risks of abuse (by adults and other young people) and should take steps to reduce those risks. All staff need to be aware of how they interact with children. The current climate of suspicion with regard to child abuse can pose dilemmas for caring adults. This is particularly true in schools like Saint Ronan's, where a pride is taken in fostering a family atmosphere. In order to protect children from abuse, and staff from suspicions of abuse, the natural inclination to comfort and reassure children through physical contact has to be restrained by a considered assessment of the situation. This does not mean that physical contact is never permissible, but there must be limits, and contact outside of these limits must be justified if necessary. Limits will vary according to the age of the child and the role of the member of staff.

All staff need to be familiar with:

- The Sexual Offences Act 2003 which specifies that it is an offence for a person in a position of trust to engage in a relationship with a young person under the age of 18 years.
- The Whistleblowing Policy (appended)
All staff, including those in EYFS must follow the Whistleblowing Policy and report any concerns about a member of staff including concerns when a member of staff shows particular interest in a child or group of children. Staff must report any unsafe or poor practice they observe or hear of.

The following guidance will be regularly re-visited through staff training:

1. Never think that abuse is impossible in your school, or that an accusation against someone you know well and trust is bound to be wrong
2. Never blur the line between professional and personal life. This needs special attention in a boarding school where we live together and spend large amounts of time together.
3. Share any concerns with the DSL if you suspect that a child is becoming inappropriately attached to you or to another member of staff or volunteer.
4. Share any concerns if you feel any member of staff or volunteer is showing particular attention to a child or group of children.
5. Observe the Code of Conduct.
6. Never enter a private area for a child (e.g. toilets, changing room, dormitory) unless in an emergency or as part of your role in the School. Always knock when entering a dormitory or changing room.
7. Be familiar with the School Trips and Education Visits Policy which must be followed in order to reduce risk.
8. Be familiar with the Visitors Policy and understand your role in protecting the school community and how this links with the PREVENT duty.
9. Observe the Use of Cameras and Mobile Devices Policy, in particular the references made to regulations around EYFS.
10. Restraint should only be used where necessary to prevent children at imminent risk of harming themselves or others or inflicting damage to property. Colleagues should be summoned where possible to be present to witness or assist. (See the Use of Force or Control or Restrain Children Policy and Children Act 1996 Section 550A)
11. Demeaning or salacious remarks should never be made to or in the presence of children – verbally or digitally. Remarks about a child's physical characteristics or development could fall into this category.
12. If it is absolutely necessary to convey a pupil in a car, always phone the parent first to agree, inform the school it is happening and of the times. The child should sit in the back of the car and use a seat belt. Staff must comply with the legal guidance re height and age regarding car seats

13. Try as far as possible to avoid being alone in a room with a child. Where one to one teaching/counselling needs to occur, try to leave the door open or arrange to be within earshot or vision of others.
14. A robust Health and Safety approach reflects the consideration we give to the protection of our children both physically within the school environment, in relation to Internet use, and when away from school undertaking school trips and visits.
15. The School recognises that children who have special educational needs and/or disabilities can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

Guidance on Staff Digital Behaviour

- Do not text or use social networking sites to contact pupils or ex pupils (until they are over 18 years old) nor accept as a friend on social networking sites, chat rooms etc.
- Do not use your phone in the classrooms or in the presence of children unless in an emergency
- Do not take photos of children using your own device. Use a school camera and only download to the school system. (Photographs should only be taken for educational or marketing purposes.)
- Staff must abide by the Acceptable Use Policy (AUP). As part of their induction, all new staff sign the AUP once they have read and understood it.
- The Use of Cameras and Mobile Devices Policies must be adhered to. The Pre-Prep policy is displayed in the EYFS area and is available to parents.
- Personal mobile phones belonging to EYFS staff must not be taken in to the classroom. These must be stored in the locked cupboard provided.
- Personal mobile phones belonging to specialist staff teaching EYFS or in the EYFS area must be stored safely and securely and must not be on their person when they are in contact with children.

Physical Contact with Pupils

The Guidance for Safe Working Practice for Adults who work with Children and Young People (DfE, 2009) acknowledges that there are occasions 'when it is entirely appropriate for... adults to have some physical contact with the child or young person with whom they are working'. Some physical contact may be necessary to demonstrate exercises or techniques during PE lessons, music lessons, sports coaching or DT, or if a member of staff has to give first aid. Young children and children who have special educational needs may need staff to provide physical prompts or help. Touching may also be appropriate where a child is in distress and needs comforting. Teachers will use their own professional judgement when they feel a child needs this kind of support. The guidance emphasises that adults should only touch children with their permission and in ways that are appropriate to their professional or agreed role and responsibilities. A 'no-touch' approach is viewed as impractical.

There may be some children for whom touching is particularly unwelcome. This may be for example because of their cultural background, or because they have been abused. It is important that all staff receive information on these children. If you are made aware of a child in this category you need to inform the DSL or Deputy DSL who will pass on the information to all relevant parties. Physical contact with pupils becomes increasingly open to question as children reach and go through adolescence, and staff should be aware that even innocent and well-intentioned physical contact can sometimes be misconstrued.

School Trips

Staff taking pupils on school trips should ensure that they are in mixed groups where possible and that staff members of both present are present for mixed groups. If trips are residential, staff should ensure that they do not enter pupils' bedrooms/bathrooms on their own, unless the situation necessitates this.

Procedures for speaking to a child on his/her own

If staff have occasion to speak to a child alone, they should take steps to ensure that they do not put themselves in a position whereby they could be accused of improper behaviour, and have no witnesses to support them. Procedures which could be followed include:

- Leaving the door of the room open
- Locating yourself near a window, so that you can be seen by passing staff

Taking pupils in your car

Staff should not take pupils home, or elsewhere, in their own cars as a matter of course. A houseparent may transport a pupil in their own car to an appointment with parental consent.

If an emergency necessitates use of their own car, the pupil should sit in the back of the car and his/her parents/guardians should be informed that the journey is about to commence. If it is not possible to speak to someone, inform the school office and ask them to leave a message. On arrival at the destination, the responsibility for the pupil will be formally transferred to the parent/guardian.

Pupils entering staff accommodation

Resident staff should not invite pupils into their homes without the express permission of the Headmaster. The exception to this is in the case of resident staff who have their own children who are pupils at the School. Pupils may enter private staff accommodation in the context of facilitating family based play and social interaction outside of normal school hours. Pupils are not allowed to enter Boarding Matron's personal accommodation under any circumstances.

Environment

All members of staff should strive to create an environment where all children in the school feel valued. All members of staff have a statutory responsibility to safeguard and promote the welfare of pupils (Children Act 2004). This duty should inform the way staff behave in the classroom and other workplaces in the school when they interact and communicate with the pupils. Staff must therefore treat pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to their professional position. Verbal abuse and intimidatory or aggressive behaviour in the classroom or wider workplace will not be tolerated and will become a disciplinary matter.

Children should be encouraged to articulate their feelings and wishes, and they should be listened to.

As adults, we should try to ensure that we:

- Do not shout
- Rarely show anger
- Do not give whole class punishments
- Are more often positive than negative
- Admit our mistakes and apologise for them
- Value what children have to offer
- Listen to all sides in any dispute
- Show genuine pleasure when appropriate

- Start afresh after any incident
- Use the manners we would expect from the children, when dealing with children and adults
- Do not give treats outside the limitations of school policy

Staff should dress appropriately: in a professional manner;

- which is not offensive, distracting or revealing;
- likely to cause embarrassment, misunderstanding or be seen as discriminatory;
- with no political or other contentious slogans.

PROACTIVE MEASURES IN PLACE TO SAFEGUARD CHILDREN AS PART OF THE EMBEDDED SCHOOL CULTURE OF SAFEGUARDING

Minimising risk and opportunities to teach safeguarding

- Anti-bullying Policy
- Free time supervision
- Consistent messages about safe touch and healthy relationships
- PSHEE and Circle Time, Social and Emotional Skills sessions.
- Children are tracked via Green forms and AS tracking
- Weekly meetings take place for the safeguarding team to review progress and action
- Regular staff training
- Online activity is tracked via monitoring and filtering software for electronic abuse
- "I am concerned" button for children provides advice and for confidential e-mails to DSL
- Tutor system to support strong and trusting relationships between children parents and staff.
- On-line safety workshops and teaching
- Assemblies

Minimising risk around online safety

Children increasingly work online and use technology. The School recognises that it is crucial to safeguard children from potentially harmful and inappropriate online material. As such we ensure appropriate filters and appropriate monitoring systems are in place. These measures also monitor abusive behaviours that may class as cyber bullying (refer to specific Anti-Cyberbullying Policy). Parents sign an Acceptable Use Policy on behalf of their children stating that they have discussed the policy with their children, and children accept the policy each time they log in to the school IT systems. Children are not allowed mobile phones here.

Monitoring software alerts the DSL immediately if any safeguarding issues arise. These range from matters of radicalisation through to mental health concerns and risk of suicidal thoughts.

Minimising risk through work with children

Children and young adults often tell other children or young adults, rather than staff and adults, about abuse. Prefects are to be made aware of how to respond if they are told of abuse of suspected abuse.

- All pupils are given guidance on the school policy on anti-bullying, anti-sexual bullying, anti-cyber bullying and the Acceptable Use Policy. Pupils agree to the Acceptable Use Policy each time they log in to school IT systems. The School Council considers relevant school policies and produces child friendly versions as appropriate.
- PSHEE and ICT curriculum time is used to cover these issues
- Circle Time and Social and Emotional Skills sessions help children understand these issues and personal safety
- Children are taught what constitutes a good and bad secret
- Pupils have access to an Independent Listener and Counsellor
- There are pupil voice councils for support and to discuss a wide range of issues including safeguarding

Minimising risk through work with parents

The School works hard to build trusting relationships with parents in order to create a safe environment in which children can develop. The School follows the Early Help guidelines and will work with parents and outside agencies to help support families. The School will discuss concerns with the parents to help find solutions. The School takes a neutral, non judgemental position but always puts the duty of care to the child as its priority.

Parents may refer to this policy via the School website to seek guidance if they have a safeguarding concern about their child or another child.

The School has a duty of care to refer concerns of a child being at harm, or risk of harm, to Children's Specialist services. If a child is considered to be at immediate risk of harm the parents will not always be contacted first. Parents should not discuss safeguarding concerns about their child or another child with other people, only the professionals supporting the child and family.

If your child tells you of a safeguarding concern, please contact one of the safeguarding team named in this policy. You are also able to report concerns directly to Children Specialist Services and the school will be notified of the referral.

Disclosures about the actions of someone outside of the school should go to Children's Specialist Services.

Safeguarding concerns regarding a member of staff would go to the Headmaster or the Local Authority Designated Officer (LADO).

Reassure your child that passing on a concern was the right thing to do. If your child promised to keep the information a secret, say that when someone is at risk of harm or being harmed, or that a child is feeling burdened by a secret, it's OK to break promises of secrets.

The School runs regular parent forums including sessions on safeguarding issues such as internet safety and these are run by both internal staff and external speakers.

Minimising risk to children with Additional Needs

For a variety of reasons, children who have additional needs face an increased risk of abuse and neglect. Communication difficulties as well as isolation can affect a disabled child's ability to recognise and understand that they are being abused as well as their ability to access help and support. They can also misunderstand non-abusive situations as being unsafe and will need specific support with this. Support for children who have additional needs is focussed on meeting the needs relating to the child's disability and staff must ensure this doesn't override the child's wider needs including safeguarding.

Other factors that may make children more vulnerable:

- Looked-after children/being in care
- Parents who misuse drugs or alcohol
- Domestic violence
- Oppression or discrimination
- Parental mental illness
- Extreme religious or cultural practices
- Chaotic, unsettled or transient lifestyles
- Lack of parental control
- Speaking English as an additional language
- SEND
- Gender non-conforming and Transgender children

SAFEGUARDING COMPLAINTS

Involving parents when an incident occurs with their child, and showing them this policy which staff adhere to, should help to avoid complaints from parents. It will not prevent all complaints and a dispute about the decisions taken may lead to an investigation, either under disciplinary procedures. In those circumstances it would be for the disciplinary panel or the court to decide whether the actions taken were appropriate and reasonable in all the circumstances. It would be likely to take account of the School's policy on a child's welfare being paramount.

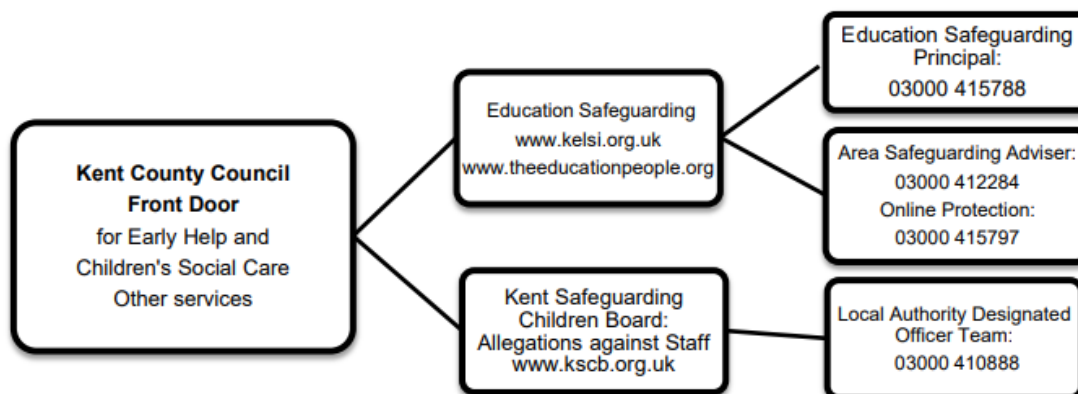
APPENDIX A - SAFEGUARDING 'WHO TO CONTACT' LIST

<u>Service</u>	<u>Contact it</u>	<u>Name of contact</u>	<u>E mail address</u>
SRS Chair of Governors	You have concerns about the conduct of the Headmaster or the DSL	Colin Willis	Via the Clerk to the Governors, John Buckles jcbuckles@saintronans.co.uk
SRS Safeguarding Governor	You have concerns about safeguarding practices at SRS	Simon Bennie	Via the Clerk to the Governors, John Buckles jcbuckles@saintronans.co.uk
SRS Headmaster	You have concerns about the conduct of a member of staff towards a child	William Trelawny-Vernon	Williamtv@saintronans.co.uk
SRS Designated Safeguarding Lead	In the case of disclosure immediately. You have any concerns about a child. You have concerns about any safeguarding related matter at SRS	Emma Trelawny-Vernon	Emmatv@saintronans.co.uk
SRS Deputy Safeguarding Lead and Head of Pastoral Care	In the absence of the DSL you have any concerns about a child. You have concerns about any safeguarding related matter in the Prep School at SRS	Ross Andrew	rossandrew@saintronans.co.uk
SRS Deputy Safeguarding Lead Pre Prep and EYFS	In the absence of the DSL you have any concerns about a child. You have concerns about any safeguarding related matter in the Pre Prep or EYFS at SRS	Andrea Bright	andreabright@saintronans.co.uk

SRS Matron	You have concerns about a child.	Angela Bouchard	angelabouchard@saintronans.co.uk
School counsellor	You wish to set up private counselling for your child at School	Justine Skeet	justine510@btinternet.com
KCC Early Help	Where there is a need for family support at the earliest stages.		TunbridgeWellsEarlyHelp@kent.gov.uk
Area Safeguarding Advisor	If you have concerns about a child or for the school to obtain advice informally on borderline cases	Gemma Wilson	03000 412284 07540 677200 07976581937 Gemma.wilson@theeducationpeople.org
LADO. Local Authority Designated Officer Team	Allegations against staff		03000 410888 kentchildrenslado@kent.gov.uk
Principal Officer of the Safeguarding Team	Ditto plus FGM advice.	Claire Ray	03000 412284 07920 108828 Claire.ray@theeducationpeople.org
E safety Officer	If you have concerns about e safety and online issues	Rebecca Avery	03000 415797 Mobile 07789 968705 Rebecca.avery@theeducationpeople.org
Kent Police Headquarters	Serious concerns relating to the Prevent Duty		01622 690690 101
DfE helpline re extremism	Serious concerns re extremism		020 7340 7264 Counter-extremism@education.gsi.gov.uk
Integrated Front Door	Where a child is at risk of harm		03000 41 11 11 Out of Hours emergency 03000 419191
Childline	For advice		0800 1111
Office of the children's commissioner			020 7783 8330
Out of School listener	For independent help.	Dr Jo Christophers	07818 424651 joelladavies@gmail.com
CEOP			0870 000 3344
NSPCC helpline			0808 800 5000

Working with Kent County Council (the Local Authority and a safeguarding partner) When dealing with disclosures, concerns, suspicions and allegations, the Safeguarding team work in a multiagency setting with the Kent Safeguarding Children Board, the Kent Education Safeguarding team, children's social care, the police and health services. All organisations involved in children's care work in line with the guidance given in Working together to Safeguard Children (July 2018). The new arrangements for the three safeguarding partners will be put in place by Kent this academic year. Staff and parents may contact any group

directly. The table below has the relevant contact details and outlines the structure of Kent's services.



APPENDIX B – DETAILED INFORMATION ABOUT THE INDICATORS OF ABUSE

The following lists are neither definitive nor exhaustive. The information has to be used in context with a range of other information related to a child's circumstances. Any concern even if there is no clear indicator must be reported to the DSL.

Physical Abuse

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries or delay in reporting them
- Excessive physical punishment
- Arms and legs kept covered in hot weather
- Fear of returning home
- Aggression towards others
- Running away

When considering the possibility of non-accidental injuries, remember that injuries may have occurred for other reasons e.g. genuine accidents or medical disorders.

Physical Neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Frequent lateness, or unexplained non-attendance at school
- Untreated medical problems
- Low self-esteem
- Poor peer relationships
- Stealing

Emotional Abuse

- Low self-esteem
- Continual self-deprecation
- Sudden speech disorder
- Significant decline in concentration
- Socio-emotional immaturity
- "Neurotic" behaviour (e.g. rocking, head banging)
- Self-mutilation
- Compulsive stealing
- Extremes of passivity or aggression
- Running away
- Indiscriminate friendliness

Sexual Abuse

Not all children are able to tell, or are believed by parents. Changes in behaviour may be a signal that something has happened. It is important to remember that there may well be no physical or behavioural signs. The following indicators may show that a child is troubled, but not through sexual abuse. The child may have some of these signs or none at all. It is a combination, frequency and duration of signs that can alert you to a problem.

Behavioural:

- Lack of trust in adults, or over familiarity with adults
- Fear of a particular individual
- Social isolation – withdrawal or introversion
- Sleep disturbance (nightmares, irrational fears, bed wetting, fear of sleeping alone, needing a nightlight)
- Running away
- Reluctance or refusal to participate in physical activity or to change clothes for activities
- Low self-esteem
- Drug, alcohol or solvent abuse
- Display of sexual knowledge beyond their years
- Unusual interest in the genitals of adults, children or animals
- Expressing affection in an inappropriate way
- Fear of bathrooms, showers, closed doors
- Abnormal, sexualised drawing
- Fear of medical examinations
- Developmental regression
- Poor peer relations
- Over-sexualised behaviour/sexual promiscuity
- Stealing
- Psychosomatic factors e.g. recurrent abdominal pains or headache
- Physical:
 - Sleeplessness, fear of the dark, nightmares
 - Bruises, scratches, bite marks to the thighs or genital area
 - Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
 - Pain on passing urine or recurrent urinary infection
 - Stained underwear
 - Unusual genital odour
 - Anxiety, depression
 - Eating disorder e.g. anorexia or bulimia
 - Discomfort/difficulty in walking/sitting
 - Venereal disease
 - Soiling or wetting in children who have been trained
 - Self-mutilation/suicide attempts

Sexual Exploitation:

- Unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Older boyfriends or girlfriends
- Change in emotional well-being
- Misuse of drugs or alcohol
- Self-harm
- Missing for periods of time or regularly home late
- Sexually transmitted diseases or pregnancy

APPENDIX C

Safer Recruitment Policy

Applies to Prep, Pre-Prep and EYFS

Saint Ronan's School is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. This policy supports the School's Safeguarding Children Policy.

The School aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

This policy applies to all appointments, including teaching and non-teaching staff, supply staff, volunteers, contractors, third parties and governors within Saint Ronan's School.

This policy and the recruitment processes comply with requirements set out in:

- Keeping Children Safe in Education September 2018
- Boarding Schools National Minimum Standards (NMS) April 2015
- The Education (Independent School Standards) Regulations 2014

This policy should be read together with the following policies:

- Equal Opportunities and Diversity Policy (Staff)
- Code of Conduct and Practice
- Safeguarding Children Policy
- Disciplinary and Grievance Procedures
- Harassment and Bullying at Work Policy

AIMS AND OBJECTIVES

The aim of the Safer Recruitment Policy is to deter, identify and reject people who might abuse children or are otherwise unsuited to working with children by having appropriate procedures for appointing staff.

The School has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the School based on the applicant's abilities, qualifications, experience and merit as measured against the Job Description and Person Specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation. All safer recruitment checks will be done in accordance with data protection and employment legislation requirements.

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, or any other actual or perceived conflict of interest, they must declare this as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

Throughout their employment at the school, all staff are expected to 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).

ROLES AND RESPONSIBILITIES

It is the responsibility of the Governing Body to:

- Ensure the School has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
- Monitor the School's compliance with these policies and procedures.

It is the responsibility of the Headmaster, Bursar and other managers involved in recruitment to:

- Ensure that the School operates Safer Recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the School.
- Monitor contractors' and agencies' compliance with this document and ensure details of all contractors and third parties are registered with the HR department.
- Promote the welfare of children and young people at every stage of the recruitment process.

The governing body has delegated responsibility to the Headmaster (teaching staff for Prep), Head of Pre-Prep (teaching staff for Pre-Prep) and Bursar (non-teaching staff) to lead in all appointments. School governors may be involved in staff appointments but the final decision will rest with the Headmaster / Bursar. The positions of Headmaster and Bursar will be appointed by a panel of the Governing Body.

RECRUITMENT AND SELECTION OF STAFF

Advertising

To ensure equality of opportunity, the School will advertise all vacant posts to encourage as wide a field of applicants as possible. Normally this entails an external advertisement. Any advertisement will make clear the School's commitment to safeguarding and promoting the welfare of children.

All documentation relating to applicants will be treated confidentially in accordance with Data Protection laws.

Application Forms

Saint Ronan's School uses its own application form. All applicants for employment will be required to complete an application form containing questions about their academic and employment history and their suitability for the role. The application must be completed in full. CVs may be supplied but will not be accepted as a substitute for an application form. All applicants are required to fully account for any gaps or discrepancies in employment history and any discrepancies will be explored at interview and may be explored with referees.

The application form will include a declaration regarding convictions and working with children, and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974.

All applicants must provide accurate answers within their application. Applicants should be aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected. Applicants who may pose a risk to children may be referred to the police and other professional regulatory bodies.

Information regarding the disclosure of a criminal record may be made in confidence by providing a supplementary sheet within a sealed envelope for the attention of the Headmaster or Bursar.

Applicants with a disability are invited to inform the school so that reasonable adjustments and arrangements can be made to assist them with the application and interview process.

Job Descriptions and Person Specifications

A Job Description and Person Specification will be produced prior to taking any other steps in the recruitment process.

The Job Description will clearly and accurately set out the duties and responsibilities of the job role including a commitment to safeguarding and promoting the welfare of children. The Person Specification will detail the skills, experience, abilities and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with children.

All applicants should be aware that any role within a school involves a responsibility for promoting and safeguarding the welfare of children.

References

References for short listed applicants will, where possible, be requested in advance of an interview. Where an applicant has indicated on their application form that they do not wish their current employer to be contacted prior to interview, this reference will be taken up immediately after interview and prior to any formal offer of employment being made.

Two written references must be provided. A reference from the applicant's current or most recent employer must be provided. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. Any discrepancies, anomalies or information which raises a concern will be followed up. Direct contact by phone or face-to-face will be undertaken with at least one referee to verify and explore detail in the reference.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism". In doing so the school will always have regard to the Prevent Duty guidance and the definition of "extremism" set out in KCSIE.

If the applicant is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary

offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the applicant has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure.

If the applicant is not currently working with children but has done so in the past, the School will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the applicant's suitability to work with children. Where the applicant has no previous employment history, the School may request character references which may include references from the applicant's school or university.

The School does not accept open references, testimonials or references from relatives.

Interviews

There will be a face-to-face interview either in person or via another method e.g. Skype. The same panel will see all the applicants for the vacant position.

The interview process will always explore the applicant's motivation and suitability to work with children. The interview will assess the applicant's ability to carry out the Job Description and meet the Person Specification. All gaps in employment or academic history and any concerns raised from references will be explored at interview. In all cases the interview panel will seek to satisfy themselves of an applicant's suitability to work with children in a day and boarding environment.

Any information in regard to past disciplinary action or allegations, cautions or convictions must be disclosed and will be discussed and considered in the circumstance of the individual case during the interview process.

At least one member of any interviewing panel will have undertaken Safer Recruitment training. Interview panels will always consist of at least two people. The member of the panel who holds Safer Recruitment training is responsible for ensuring suitable questions are asked and recorded, to establish the applicant's motivation and suitability to work with children.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to children. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at Saint Ronan's School.

OFFER OF APPOINTMENT FOR STAFF

The appointment of all new employees is subject to the satisfactory receipt of all appropriate recruitment checks including:

- Verification of identity
- Verification of the right to work in the UK
- At least two satisfactory written references
- A full employment history together with a satisfactory explanation of any gaps in employment
- Verification of professional qualifications, where appropriate

- A satisfactory enhanced DBS check and if appropriate, a check of the Barred List maintained by the DBS
- Where the successful applicant has worked or been resident overseas such checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered
- For an applicant that has taught outside the UK, an EEA check using the School to School Teacher Services system for information about any teacher sanction or restriction
- For an applicant to be employed as a teacher, a check that that the applicant is not subject to a prohibition order issued by the Secretary of State
- An overseas check for any teacher who has been out of the country for more than 3 months in the last 5 years.
- Satisfactory medical fitness questionnaire
- Where appropriate, receipt of a Declaration form showing that the applicant is not disqualified from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016).
- Where the successful applicant will be taking part in the management of the School, a check under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Leadership Team and teaching Heads of Department and all internal appointments to these positions.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment practice. The checklist will be retained on personal files. The Human Resources Department will confirm when all paperwork has been received and only then can a start date be agreed with the applicant.

Proof of Identity and Right to Work in the UK

All applicants invited to attend an interview at the School will be required to bring at least three identification documents as proof of address, identity and eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations. Only original documents or certified copies are acceptable.

1. All applicants must provide:

- A passport or,
- A current driving licence with photograph or,
- A full birth certificate.

2. All applicants must provide:

- A utility bill or,
- A bank or building society statement or,
- A credit card statement.

This must show the applicant's current name and address and have been issued within the last 3 months.

3. Applicants must provide one additional document from one of the lists above.

Where relevant applicants must provide evidence for a change of name. Applicants must provide any additional documents required to verify their right to work and reside in the UK.

Qualifications

All applicants must provide proof that they have obtained any qualification specified for the role or relevant to the position. Only original or certified copies of certificates are acceptable.

Employment History

All applicants will be required to provide a full employment history as part of the application process. Applicants will be required to provide a satisfactory explanation for any gaps in employment.

DBS (Disclosure and Barring Service) Certificate

All staff at Saint Ronan's School require an enhanced DBS Certificate and therefore a DBS Certificate must be obtained before the commencement of employment of any new employee.

All staff in regulated activity will require a barred list check.

Where staff have a DBS Certificate and have previously signed up to the Update Service, consent must be given for the validity of that certificate to be checked.

In exceptional cases and only when permission is granted by the Headmaster will a staff member be able to start without a DBS certificate. In such cases the DBS certificate must have been requested and a separate barred list check (where required) undertaken in advance of appointment. In such cases:

- Confirmation of appointment will be subject to receipt of a satisfactory DBS Certificate
- The DBS application will be made in advance of the start date
- A satisfactory check of the barred list, all overseas checks and all relevant prohibition checks will be completed in advance of the start date
- Appropriate safeguards, such as supervision will be put in place, and recorded in a formal risk assessment
- Safeguards will be reviewed every two weeks and must be approved by the Headmaster, Head of Pre-Prep or Bursar
- The applicant concerned will be informed of the measures in place

Portability of DBS Certificates

The DBS code of Practice does not facilitate portability of DBS Certificate checks unless the applicant has registered to the DBS Update Service. For clarity portability refers to the re-use of a DBS Certificate obtained for a position in one organisation and later used for another position in another organisation. Saint Ronan's School is committed to adhering to these Codes of Practice and does not accept DBS Certificates carried out by another organisation unless they are registered with the DBS Update Service.

Validity of DBS Certificate

All staff are obliged to inform the School should they receive any convictions, cautions, court orders, reprimands or warnings after the date of their DBS certificate received by the School. Failure to declare any convictions may disqualify an applicant for appointment or result in summary dismissal if the discrepancy comes to light subsequently.

Dealing with convictions

The School operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances,
- decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Human Resources Manager. A decision will be made by the Headmaster or Bursar following this meeting.

Barred List

Before starting work all new staff in regulated activity will be checked against the barred list, a list maintained by the Disclosure and Barring Service of individuals who are barred from working with children.

It is illegal for schools to employ anyone who is on the list.

The definition of regulated activity includes:

- All regular work for schools with opportunity for contact with children except:
 - o Work (not entailing personal care) by supervised volunteers
 - o Work (not entailing care or teaching) by occasional/temporary contractors
 - o Work by pupils for other pupils (excepting for those in early years)
- Personal care, or health care:
 - o Personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing
 - o Health care means care for children provided by or under the direction or supervision of, a regulated health care professional
 - o Within the definition of care, activity is always regulated; considerations of regularity and supervision do not apply
 - Regular, unsupervised teaching, training, instructing, caring for or supervising children
 - Regularly providing advice or guidance for children on well-being
 - Driving a vehicle only for children.

European Economic Area (EEA) Checks

The School is required to check whether individuals who have taught in countries in the EEA and who will be carrying out teaching work (including peripatetic and coaching), are subject to a sanction or restriction imposed by another EEA professional regulating authority for teachers. The check is carried out using the School to School Teachers Services system.

Additional Overseas Checks

All new employees who have lived or worked outside the UK for a continuous period of 3 months or more at any time in the last 5 years will be subject to additional checks. The School may also make additional overseas checks on any other applicant where these checks are deemed relevant by the School.

These checks are required to supplement the information provided by the Disclosure and Barring Service and suitable checks must be completed before the applicant begins work. The Home Office provides guidance on the appropriate checks for each country and the School will have regard to this guidance. Where the country is specified as unable to produce an official record, the School will make all reasonable efforts to verify an applicant's suitability. This will include seeking additional references which cover the time spent overseas.

All applicants must co-operate fully in the process to obtain these additional checks. In exceptional cases, where the official record has been requested but not received before the applicant is due to start work, the applicant may start work only if:

- Additional satisfactory references covering the time overseas have been received in advance of the applicant starting work and
- The Headmaster has given permission for the applicant to start work, subject to the same safeguards set out above for when a DBS Certificate has not been received.

Further details on the overseas checks available can be obtained here:

<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

Prohibition from Teaching

All applicants who will be carrying out teaching work will be checked on the DfE Secure Prohibition list for the following:

- Those that have been prohibited from teaching
- Those that have failed to successfully complete their induction or probation period
- Those that may be the subject of a suspension or conditional order imposed by the General Teaching Council for England (prior to abolition) that is still current

A prohibition order aims to protect pupils and to maintain public confidence in the profession.

Prohibition from Management

All governors, head teachers, staff on the senior leadership team and teaching positions with management responsibility will be subject to a check for prohibition from management (section 128 direction). This check will be made on all teaching posts above classroom teacher and all ancillary posts where the person is a member of the Senior Leadership Team.

Disqualification from Childcare

The DfE Keeping Children Safe in Education, requires schools to ensure that all staff working or directly concerned in the management of any Early Years setting, including Reception and out-of-hours school care for children up to eight years of age are not “disqualified”.

Saint Ronan's School requires all staff (both Prep and Pre-Prep) to sign a Disqualification from Childcare declaration annually.

The grounds for disqualification include:

- They are on the DBS Children's Barred list
- They have been cautioned for, convicted or charged with certain violent and sexual criminal offences against children and adults, at home or abroad;
- Other orders have been made against them relating to their care of children;
- They have had their registration cancelled in relation to childcare or children's homes or have been disqualified from private fostering.

If a staff member has grounds for disqualification and is disqualified, they may, in some circumstances, apply to Ofsted for a decision to waive the disqualification. For more information on disqualification please visit the following website:

<http://www.ofsted.gov.uk/resources/applying-waive-disqualification-early-years-and-childcare-providers>.

Medical Fitness

There are certain questions Saint Ronan's School may ask at an interview stage to determine whether applicants can undertake a function which is intrinsic to the job.

Anyone appointed to a post involving regular contact with children must possess the appropriate level of physical and mental fitness before any appointment offer is confirmed.

All successful applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required.

Staff must also inform the School of any changes to their mental or physical health that may impact upon their ability to work with children or any changes to their own circumstances that the School should be aware of.

The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

Prevent Duty

The School has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This is

known as the Prevent duty. Schools are required to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Accordingly, as part of the recruitment process, when an offer is made the offer will be subject to a Prevent duty risk assessment

VOLUNTEERS

A volunteer undertaking personal care, for any period of time, whether supervised or otherwise will be in regulated activity. An enhanced DBS check with Barred List check is required.

- Personal care is defined as: helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing.

A volunteer who undertakes regular or frequent activity for the school and who is unsupervised will be in regulated activity. An enhanced DBS check with Barred List check is required.

The School also requires an enhanced DBS check (without barred list) for all other regular or frequent volunteers who are not in regulated activity.

Any unchecked volunteers must be supervised at all times. Supervision must be undertaken by a person who is themselves in regulated activity.

SUPPLY AGENCY STAFF

When the School uses agency or supply staff (in any position), the School must obtain confirmation in writing from the agency that all relevant checks (specified in the Independent School Standards Regulations 2014) have been completed in respect of that person. This must be received in advance of that person commencing work.

Supply agencies are required to perform the following checks on each person supplied:

- Verification of identity
- An enhanced DBS check which has been made no earlier than 3 months before the person is due to start work at the School (except where the exceptions in the ISSR paragraph 19.4 apply).
- Verification of right to work in the UK
- Where required, a check of the Barred List maintained by the DBS
- For a person supplied as a teacher, a check that the applicant is not subject to a prohibition order issued by the Secretary of State.
- Where the person supplied will be taking part in the management of the school, a check under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Leadership Team and teaching Heads of Department.
- Verification of relevant qualifications
- Where the person supplied has worked or been resident overseas such checks and confirmations as the School and agency may consider appropriate so that any relevant events that occurred outside the UK can be considered
- Where the person supplied has taught overseas, an EEA check using the TRA Teacher Services system for information about any teacher sanction or restriction.
- Receipt of at least two satisfactory references
- A declaration or verification of medical fitness

- Check of previous employment history
- Check for disqualification from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016).

Agencies are required to inform the School of any information which has been disclosed on the DBS certificate obtained by the agency. The School will require supply staff to show their original DBS certificate to the School.

All supply staff are required to provide proof of identity on the first day of arrival.

CONTRACTORS

Under no circumstances will unchecked contractors be allowed to work unsupervised within the School. Supervision of contractors must be undertaken by a person who themselves is in regulated activity.

Where contractors are to be checked, the levels of check undertaken will be appropriate to the role and whether the work is classed as regulated activity.

All checked contractors must be notified to the HR department who will ensure the correct checks have been completed by the employer before the contractor is allowed to work unsupervised.

GOVERNORS

All Governors complete a selection process, which requires the submission of a CV and an interview with selected Governors from the Nominations and Remuneration Committee.

Every Governor has an enhanced DBS check, barred list check and prohibition from management check. Each appointment is ratified by the Full Governing Body for a period of six years and may be subject to re-appointment. The School arranges for all new Governors to receive a thorough induction in safeguarding of children and in the compliance and fiduciary duties of governance.

SINGLE CENTRAL RECORD OF APPOINTMENTS (SCR)

The School maintains a single central record of all recruitment and vetting checks. This record is maintained by the Human Resources department in accordance with the requirements of the Independent School Standards Regulations 2014.

The Record will contain details of all current members of staff at the School, the Governors and all individuals who are in regular contact with children including supply staff, volunteers and those employed as third parties.

INDUCTION PROGRAMME

All new employees will be given an induction programme which will clearly identify the School's policies and procedures, including the Safeguarding Children Policy, and make clear the expectation and Codes of Conduct which will govern how staff carry out their roles and responsibilities. The Staff Induction Policy will be provided as part of an employee's joining instructions.

ONGOING EMPLOYMENT

Saint Ronan's School recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. The School will therefore provide ongoing training and support for all staff, as identified through the annual review/appraisal procedure.

DOCUMENT RETENTION AND DATA PROTECTION

The School is legally required to undertake the above pre-employment checks and to take all reasonable steps to establish an applicant's suitability to work with children. Therefore, if an applicant is successful in their application, the School will retain on their personal file any relevant information provided as part of the application process.

This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications and any other documentation relevant to the application. Medical information may be used to help the School to discharge its obligations as an employer e.g. so that the School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue. Medical information is also used to establish whether an applicant is medically fit to undertake their duties in regard to caring for children.

This documentation will be retained by the School in line with statutory and legal requirements. All information retained on employees is kept centrally in the Human Resources Office.

The School will retain documents relating to the vetting of other adults (e.g. volunteers, 3rd party providers, contractors) on the same basis.

Saint Ronan's School will retain all interview notes on unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed.

Copies of DBS certificates will be retained for successful applicants for 6 months.

MONITORING AND EVALUATION

The Bursar and Human Resources Manager will be responsible for ensuring that this policy is monitored and evaluated throughout the School.

This will be undertaken through regular audits of the Single Central Record, appropriate training for those involved in recruitment and ensuring that the policy is reviewed and updated in line with relevant legislation.

The Safeguarding Governor will also regularly and frequently check the Single Central Record and records of appointments to ensure compliance.

APPENDIX D

Managing Allegations against staff

School's procedure for dealing with allegations of abuse against teachers and other staff

This guidance complies with the framework guidance about managing cases of allegations of abuse against people who work with children is set out in part 4 of "Keeping Children Safe in Education" "KCSIE" (September 2018) and in Working Together to Safeguard Children "WT" (July 2018).

All allegations of abuse against teachers are handled by the LADO Team. Any member of the LADO team can be contacted and details will be passed to the intake officer. GDPR cannot be allowed to stand in the way of safeguarding children.

LADO Team contact number: **03000 410 888** E Mail: kentchildrenslado@kent.gov.uk or secure via: gcsxsafeguardingunit@kent.gcsx.gov.uk

Team covering the Kent Local Authority:

Becky Cooper (Tues, Wed, Thurs, Fri) LADO Manager
Jinder Pal Kaur LADO
Yetunde Areeson LADO
Admin Support: Emma Cumberbatch, Admin Officer: Jane Davey
If the call is urgent i.e. the child is in immediate danger and the call CANNOT for through to the officer on Duty, the call should go through to:
Central Referral Unit 03000 41 11 11 Urgent child protection issues outside of office hours: Central Duty Out of Hours Number: 03000 41 91 91

Borderline cases can be discussed informally with the LADO without identifying the School or naming individuals. Following discussions, the LADO will judge whether or not an allegation or concern meets the relevant threshold. Discussions with the LADO will be recorded in writing, and communication with both the individual and the parents of the pupils/ parents agreed. The LADO and the HM will decide in the circumstances what further steps should be taken. This could involve informing parents and calling the police.

Duties as an employer and an employee

This guidance is about managing cases of allegations that might indicate a person would pose

a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) in a school that provides education for children less than 18 years of age 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; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

This guidance relates to members of staff regardless of whether the school is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Initial considerations

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The DSL should be informed of all allegations that come to a school's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate.

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

The purpose of an initial discussion is for the DSL and the HM to consider the nature, content and context of the allegation and agree a course of action. The DSL may ask the HM to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the HM will want to involve the police

immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the HM should discuss the allegations with the DSL in order to help determine whether police involvement is necessary. Where the Chair of the Governors is dealing with allegations he should contact the local authority as outlined in this policy.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the HM and the DSL, and agreement reached on what information should be put in writing to the individual concerned and by whom. The DSL should then consider with the HM what action should follow both in respect of the individual and those who made the initial allegation.

The HM should inform the accused person about the allegation as soon as possible after consulting the DSL. It is extremely important that the HM provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the HM should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused. The HM must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the School or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step (see further information on suspension which follows).

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance Working Together to Safeguard Children 2018. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the DSL should discuss the next steps with the HM. In those circumstances, the options open to the School depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the DSL should discuss with the HM how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff.

However, other circumstances (such as lack of appropriate resource within the School, or the nature or complexity of the allegation) will require an independent investigator.

Where an allegation is against the HM, the HM must NOT be informed of the allegation prior to contact with the Chairman of the Governors, Colin Willis and the LADO.

Supporting those involved

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

The case manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. That may include support via the local authority occupational health or employee welfare arrangements. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraph 163). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need

Confidentiality

It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public

themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited.

“Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public”. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

In accordance with the Association of Chief Police Officers’ (ACPO) guidance the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates’ court to request that reporting restrictions be lifted.)

The case manager should take advice from the DSL, police and children’s social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

Managing the situation and exit arrangements

Resignations and ‘settlement agreements’

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

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person’s period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Record keeping

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be preserved for the term of the Independent Inquiry into Sexual Abuse and at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

References

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

Timescales

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are shown below: the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets should be achieved in all but truly exceptional cases. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the DSL. In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Oversight and monitoring

The DSL has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the Local Safeguarding Children Board (LSCB) on the subject. The DSL will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces should also identify officers who will be responsible for:

- liaising with the DSL;
- taking part in the strategy discussion or initial evaluation;
- subsequently reviewing the progress of those cases in which there is a police investigation; and
- sharing information on completion of the investigation or any prosecution.

If the strategy discussion or initial assessment decides that a police investigation is required, the police should also set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service (CPS) about whether to: charge the individual; continue to investigate; or close the investigation. Wherever possible, that review should take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the DSL or police. But suspension is highly unlikely to be justified on the basis of such concerns alone.

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the DSL. In cases where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school, it will be necessary to immediately suspend that person from teaching pending the findings of the National College for Teaching and Leadership's (NCTL) now TRA investigations.

The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the DSL, police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid

suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the school so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the DSL. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the proprietor of the school, or governing bodies of the school who are the employers of staff at the school. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the DSL should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.

Information sharing

In a strategy discussion or the initial evaluation of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the employer should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Children's social care services should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

Specific actions

Following a criminal investigation or a prosecution the police should inform the employer and DSL immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged. In those circumstances, the DSL should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

On conclusion of a case

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the DSL should discuss with the case manager and their personnel adviser whether the school will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and, in the case of a member of teaching staff, whether to refer the matter to the NCTL, now TRA (Teaching Regulation Agency) to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school.

In respect of malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the designated officer(s) should refer the matter to the children's social care services to determine whether the child concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the headteacher, should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil.

Learning lessons

At the conclusion of a case in which an allegation is substantiated, the DSL should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The DSL and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual

APPENDIX E**Whistleblowing**

The School encourages a culture of safety and of raising concerns. Saint Ronan's has a culture of valuing staff and of reflective practice.

We aim, through this policy, to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the organisation.

The School's policy on whistleblowing is intended to demonstrate that the School:-

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

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

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

A member of staff will be at liberty to express their concern to the HM or the Deputy HM. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept

informed of progress and, whenever possible and subject to third party rights, will be informed of the Resolution. A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Trustees.

Where all internal procedures have been exhausted, a member of staff shall have a right of access to the Governors. It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the employee reasonably believes: -

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

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

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

All staff can contact the NSPCC Whistleblowing advice line on 0800 028 0285. This line is free and anonymous.

APPENDIX 5

POLICY ON THE USE OF FORCE TO CONTROL OR RESTRAIN PUPILS

Exceptional circumstances could arise where it is necessary to use “reasonable force” to safeguard pupils. Such force may only be used to prevent harm to a person or property. This should be read in conjunction with the anti-bullying policy.

Background and definitions

1. Whilst the Education and Inspections Act 2006 does permit members of staff to use “reasonable force” to control or restrain a pupil, such actions should be viewed as a last resort.
The type of reasonable force allowable can range from putting an arm out to prevent a pupil hurting themselves to the more extreme circumstances of grabbing a pupil who is running into danger.
2. Reasonable means using no more force than is necessary to keep a pupil safe. This does not mean that using force is a reasonable activity. Staff should be clear that such an activity is an exception.
3. Control means either passive physical contact, such as standing between pupils or blocking a pupil’s path or active physical contact such as leading a pupil by the arm out of the room.
4. Restraint means to hold back physically or to bring a pupil under control. It is used in more extreme circumstances, for example when two pupils are fighting and refusing to separate.
5. Corporal Punishment must never be given to a pupil: this would constitute battery in the eyes of the law. However, anything done to avert an immediate danger of personal injury to any person, or an immediate danger to property, would not constitute corporal punishment.
6. Physical force must never be used as a punishment.

What are exceptional circumstances?

In exceptional circumstances only, staff supervising pupils are authorised to use reasonable force to prevent pupils from hurting themselves or others, or damaging property or from causing disorder.

Situations in which the use of force might be considered are those such as preventing a pupil from:

- Running in front of a moving vehicle
- Behaving in a disruptive manner and not responding to verbal signals or hand signals.
- Harming someone
- Harming oneself.

When using force, the member of staff must make reasonable adjustments for those with SEND.

Where there is an immediate and high risk of death or serious injury, a member of staff would be justified in taking any necessary action consistent with the principle of seeking to use the minimum amount of force required to achieve the desired result. Even in such an emergency, staff should make every effort to avoid acting in a way that might cause injury.

APPENDIX 6

ACTION IF A PUPIL IS MISSING

Usual non-school attendance, missed appointments, or a history of frequent moves may indicate a child is at risk. In order to monitor children who fall into this category, the school will:

- Record daily attendance
- Contact parent/carer if no explanation is given as to absence
- Request Doctor's note for prolonged illness
- Handover child to their next school
- Report any child to the DSL to complete a child missing in education form where we do not know where that child is moving on to.

This procedure is for any missing child in the School, including a child in the EYFS

During the working day:

- First check with the pupil's friends
- Check the Music Department
- Check with the School office

In the case of an older child, staff will also obtain from the child's teachers and fellow pupils relevant information as to the state of mind or personal problems which could have a bearing on the situation.

This procedure is for any missing child in the school including a child in the EYFS

In the event of a pupil becoming unaccountable, staff will immediately put a call out on a radio saying 'Missing child, I repeat Missing child'.

The fire bells and bell on the terrace should be rung and all children should congregate on the tennis courts where role call will be taken.

Staff will also obtain from the child's teachers and fellow pupils relevant information as to the state of mind or personal problems which could have a bearing on the situation.

If the child is not found, the Headmaster or member of the SMT (in his absence) will coordinate staff to go to:

- Front of school
- Side of mansion house
- Grounds from mansion house to salt mines
- Grounds from mansion house to Timbuctoo
- Sports Hall and Shandy Ba
- Outside Harris building and the Woodland Classrooms
- Inside mansion house
- Inside Harris building

- Inside Stable block
- Through the woods.

Support staff or teachers who are not teaching or supervising children at the time will join the hunt.

Y7 & Y8 pupils can join the search under guidance from SMT.

John Watson's mobile should be rung to alert him to the search 07742 750203

If this proves unsuccessful the HM or deputy will telephone the local police station

Stating:

This is Saint Ronan's school

Water Lane

Hawkhurst

TN18 5DJ

Telephone number: 01580 752271

We have a pupil missing

- Give the name of the pupil
- Age
- Length of time unaccounted for
- Last known location
- Details of clothing worn, if known

The person in charge will then

- contact the Matron to check if the child is on any medication
- contact the child's parents/guardians

On the arrival of the Police, all relevant parties and, if requested, others will assist in any search procedure instigated by the senior officer in charge

If a pupil is missing from Boarding:

- Check with the pupils friends
- Consult the Senior Member of boarding staff
- Make a thorough search of the boarding area
- Ring the Headmaster who will contact the police as above.