



Safeguarding Policy

This is the Safeguarding Policy for Polwhele House, including Whistle Blowing. It covers all day, weekly and occasional boarding pupils and EYFS. It is published on our website for parents of current and prospective pupils as per ISI guidelines. It takes account of the National Minimum Standards for Boarding Schools and the Department for Education publications 'Keeping Children Safe in Education (KCSiE)' September 2016 and 'The Prevent Duty' published June 2015. It is in accordance with inter-agency procedures.

At Polwhele House School we believe that the welfare of the children in our care is paramount. This is our first consideration when taking action.

1. Statement of intent

At Polwhele House we are committed to the protection of the children. Our setting will work with the children, parents and the community to ensure the safety of the children and to give them the very best start in life. We believe that all children have the right to be protected from any form of abuse. Therefore, any suspicion of abuse will be promptly responded to. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. We expect respect, good manners and fair play to be shown by everyone so that every pupil can develop to his/her potential and feel positive about themselves. All pupils should care for each other.

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. The school considers, at all times, the best interests of the pupils.

2. Aims

In order to achieve this we:

- Promote a child's right to be strong, resilient and listened to by having a school environment that encourages children to develop a positive self-image;
- Promote a child's right to be strong and independent;
- Help children to establish and sustain good relationships within their families, with peers and with other adults;
- Support children in staying safe by teaching them how to identify and minimise risk, how to make informed and safe choices, including e-safety, and how to build resilience to the risks of radicalisation;
- Promote the Every Child Matters (ECM) programme (www.everychildmatters.co.uk);

- Promote the government publication 'Keeping Children Safe in Education September 2016 (KCSiE)', ensuring all staff have read the summary, and issuing a copy to all new staff;
- We work in line with the statutory guidance 'Working Together to Safeguard Children' February 2017 update;
- Promote the DfE publications: 'The Prevent Duty' (July 2015), 'The Prevent Duty: Departmental advice for schools and childminders' (June 2015) and 'The use of social media for online radicalisation' (July 2015).

3. Inter-Agency Liaison or The Team Around the Child (TAC)

- The school will follow the safeguarding procedures in line with those of the Cornwall and Isles of Scilly Safeguarding Children Board.
- We have 3 copies of 'What to do if you are worried a child is being abused' for parents and staff (office, Prep staff room, Pre-prep staff room). All staff are familiar with what to do if they have a concern.
- We have procedures for contacting the local authority on safeguarding issues, including a list of names, addresses and contact numbers of social services to ensure that they can be contacted easily (www.proceduresonline.com/swcpp/).
- Cornwall Multi-Agency Referral Unit: 0300 1231 116
- Cornwall Out of Hours Service: 01208 251300
- We notify the registration authority (Ofsted) of any incident or accident and any changes in our arrangements which may affect the wellbeing of children.
- Contact details of the National Society for the Prevention of Cruelty to Children (NSPCC) are kept on the premises.
- If a referral is to be made to the local authority social services department, we act within the Local Safeguarding Children Board and safeguarding guidance in deciding whether we must inform the child's parents at the same time.
- We have a statutory legal duty to refer an individual, where there is the risk that he or she may harm or has caused harm to children, to the Disclosure and Barring Service within one month of the individual's dismissal or resignation because he or she has been considered unsuitable to work with children. The referral form can be downloaded from www.gov.uk/government/publications/dbs-referrals-form-and-guidance. We have a legal duty to respond to any requests for information that we received from the IDBS at any time.
- All school staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

4. Methods

We have a Designated Safeguarding Lead (DSL) who is responsible for safeguarding in our school. The DSL for the whole school including EYFS is the Headmaster, Alex McCullough. He is assisted by the Deputy DSL (DDSL) the Deputy Head, Julie Keyes. Both the DSL and DDSL have been trained in safeguarding and inter-agency working. They undergo refresher training every two years.

- We provide adequate and appropriate staffing to meet the needs of children.

- We have procedures for recording the details of visitors to the setting and checking the identities of contractors and visiting staff on arrival.
- We abide by the guidelines in KCSiE (September 2016) requirements in respect of DBS for staff and volunteers, to ensure that no disqualified person or unsuitable person works with or has access to the children.
- We ensure all staff have some basic safeguarding training including.
- The school understands and follows the LSCB guidance and threshold guidance found on the CioSSCP website (www.safechildren-cios.co.uk/media/28243514/cios-scp-threshold-guidance-august-2017.pdf).
- Volunteers do not work unsupervised.
- We ensure that all staff, volunteers, and temporary staff are made aware of safeguarding procedures and complete the Child Protection Induction Procedure for Staff and Volunteers, signing the relevant form which is then held on file by the Bursar (see *Staff Induction Policy*).
- Any deficiencies or weaknesses in safeguarding arrangements are remediate without delay as soon as they are identified.
- The Principals (proprietors) carry out an annual review of the Safeguarding Policies and Procedures, including reviewing the efficiency with which the policies are implemented and the related duties discharged; Staff with safeguarding experience may contribute to writing policy. The proprietors undertake such training required to carry out this function.
- We check with the relevant employer that any staff employed by another organisation has had the appropriate suitability checks if they are responsible for pupils of the school on a site away from the school.
- Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of this child.
- The Chair of the Managing Council is nominated to liaise with the local authority and/or partner agencies in the event of allegations of abuse made against the DSL.
- We consider how children may be taught about safeguarding, including online, through teaching and learning opportunities as part of providing a broad and balanced curriculum.
- We ensure children can express their views and give feedback by means of the School Council. We also have an independent listener they can contact.

5. Disclosures

If a child makes a disclosure to a member of staff, that member of staff must:

- Offer reassurance to the child;
- Listen to the child;
- Not ask leading questions
- The staff are aware that they cannot guarantee confidentiality as they may need to tell someone else.
- See Staff Code of Conduct

6. Types of Abuse and Neglect (See Appendix 1 – Signs and Types of Abuse)

- Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse may involve the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional

development. 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 grooming 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. It includes allowing children to watch inappropriate material.
- Neglect may mean the persistent failure to meet a child's basic physical and/or psychological needs.
- Abuse may be caused by adults (men and women) or by other children, therefore staff should be aware of pupil relationships and the potential for peer abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues i.e. www.nspcc.org.uk. Staff can also access broad government guidance on the gov.uk website to assist in the fulfilment of their safeguarding responsibilities in the following areas:

- Body image issues
- Bullying including cyberbullying
- Children missing education (refer to KCSiE Annex A)
- Children missing from home or care
- Child sexual exploitation, including female genital mutilation (FGM) – (teachers to report FGM to THE POLICE; refer to KCSiE Annex A)
- Domestic violence (www.operationencompass.org)
- Drugs
- Fabricated or induced illness
- Faith abuse
- Forced marriage (refer to KCSiE Annex A)
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Honour-based violence
- Indicators of abuse from parents or carers
- Mental health
- Missing children and adults
- Peer abuse, including victim support
- Private fostering
- Preventing radicalisation, i.e. children in danger of being drawn into terrorism (ANYONE can make a referral for this, not just the school's designated safeguarding lead)
- Relationship abuse
- Self-harm
- Sexting and unacceptable banter
- Trafficking

7. Possible Signs of Abuse

The NSPCC lists some of the signs and behaviours which may indicate that a child is being abused:

- Repeated minor injuries
- Children who are dirty, smelly, poorly clothed or who appear underfed

- Children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- An air of 'detachment' or 'don't care' attitude
- Overly compliant behaviour
- A 'watchful' attitude
- Sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age) continual open masturbation, aggressive and inappropriate sex play
- A child who is reluctant to go home or is kept away from school for no apparent reason
- Does not trust adults, particularly those who are close
- 'Tummy pains' with no medical reason
- Eating problems, including over-eating, loss of appetite
- Disturbed sleep, nightmares, suicide attempts
- Self inflicted wounds
- Reverting to younger behaviour
- Depression, withdrawal,
- Relationships between children and adults which are secretive and exclude others
- Pregnancy

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

8. Recording suspicions of abuse and disclosures

Staff must make a record of:

- The child's name;
- The child's address;
- The age of the child;
- The date and time of the observation of the disclosure;
- An objective record of the observation or disclosure;
- The exact words spoken by the child as far as possible;
- The name of the person to whom the concern was reported, along with date and time; and
- The name of any other person present at the time.

All members of staff are aware of the procedures for recording in the Child Protection Record. In addition to the above the member of staff must report any disclosures to the DSL so that any information can be recorded in the central record.

We will record all allegations of abuse and our subsequent actions including any disciplinary actions.

9. Anonymous Allegations

If we are faced with an anonymous allegation of child abuse which names both a member of staff and a child we will handle it in exactly the same way as if we knew the identity of the person making the allegation. We will report the matter to the Local Safeguarding Children Board and be guided by them in our handling

of the allegation. Where the allegation names a member of staff but not the pupil we will normally interview the member of staff and ask for his or her version of events unless the LSCB has advised otherwise. A record will normally be kept.

10. Responding to suspicions of abuse

- We are aware that there are many different forms of abuse, including physical, emotional and sexual as well as neglect.
- If a child is suffering a form of abuse, it may be demonstrated in the things they say, changes in their appearance and unusual behaviour or play.
- If the above changes are apparent, they must be recorded by the child's teacher, with details of the concern and the date. The concern must be discussed with the DSL. Information held will be stored confidentially. A child in need should be referred to the children's social care and a child at risk to the same organisation but referral should be immediate.
- Staff must be careful not to alter the way they speak to the child or ask too many questions as this may influence the outcome.
- The members of the staff involved must always remember that **the child's welfare is paramount. Our priority is to safeguard the young people in our care. We will give all the support that we can to a pupil who has been abused. The Headmaster, together with the Principals, will consider how best to support and monitor the pupil concerned through any process of investigation, liaising closely with parents, guardians, Local Safeguarding Children Board or other agencies involved to identify the support strategies that will be appropriate.**
- The school understands and implements the resolving professional differences (escalation) process as necessary (www.cornwall.gov.uk/media/18591637/conflict-resolution-policy-resolving-professional-differences-and-flowchart.pdf).
- In the case of a disclosure made by a child to a member of staff, no other staff should question the child. The exact words used by the child must be recorded, in writing, by the member of staff to whom the disclosure was made. These details should be passed to the Social Services as part of a referral or if appropriate the DSL will make a referral to the Cornwall Multi-Agency Referral Unit, 0300 1231 116 (out of hours 01208 251300). This must be done within 24 hours of disclosure. This referral should be followed up in writing within 48 hours. The school contacts the MARU if they have not received a letter within 5 working days following a referral.
 - Children in need → DSL → children's social care
 - Children at risk → DSL → police (if a crime has been committed, immediately, or at least within 24 hours) or children's social care (if not a crime)
- Where possible the parents of the child concerned should be informed, either before the referral is made or after. This will depend on the circumstances and the degree of concern. In some circumstances, the parents should not be informed, this will usually be the case if the parent is the likely abuser or where the guidance of the Local Safeguarding Children Board does not allow this (for example, if fabricated illness, sexual abuse or multiple abuse is suspected or where if informing the parents may lead to a situation on which one's own safety or the safety of others is a concern). The desire to inform the parents must not delay a referral.

- The staff member should carry out any instructions given them by the Social services, or other enforcing agencies such as the Police.
- If in an extreme case, the member of staff is concerned for the life or well-being of a child, themselves or other people involved, the Police should be contacted by dialling 999.
- Throughout the entire process, confidentiality should be maintained as far as possible. This can be achieved by speaking only to those staff members that need to know, by making telephone calls in private and seeing parents in private. Staff involved must be reminded of the need for confidentiality.
- Any suggestions of breaches of 'The Prevent Duty', FGM or children missing education must be reported to the relevant agencies.
- The school risk assesses the Prevent duty for its pupils and those who may be at risk of radicalisation.
- If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. If in any doubt staff should speak to the DSL. There is a statutory duty on teachers to report personally to the police where they discover that FGM appears to have been carried out on a girl under 18.

The referral process would normally be carried out by the DSL; however, any member of staff may make a referral.

11. Arrangements for dealing with peer-on-peer allegations

Polwhele House has a robust policy in place for dealing with bullying in all forms (see *Anti-Bullying Policy*). In very serious cases, and only after the Headmaster has been involved, it may be necessary to make a report to the Police or Social Services.

Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include sexting, sexual assault and gender-based issues. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse.

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

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the LCSB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LCSB, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LCSB and/or the Police as appropriate.

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

12. Allegations against DSL, staff, volunteers or temporary staff (staff)

- If an allegation is made against anyone working with children in the school, the school will not undertake its own investigation of allegations without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the LADO on a no-names basis.
- We ensure that all parents know how to complain about staff, volunteers or temporary staff (staff) within the setting, which may include allegations of abuse.
- Allegations that a member of staff or volunteer has abused a pupil or pupils either inside the school premises or during a school trip or visit could be made by parents, the abused pupil, other members of staff, other pupils, the Police or Social Services, a third party.
- An allegation of such seriousness would be reported directly to the Headmaster (DSL) but if another member of staff is told first they must ensure that the Headmaster is informed immediately or, if he is unavailable or involved, the Principals (proprietors) should be told at once. The Principals should be told at once of any allegation involving the Headmaster or DDSL. In this case the Principals would report this immediately to the Local Authority Designated Officer (LADO) without informing the Headmaster.
- We will respond promptly and sensitively to the legitimate concerns of the victim and his or her family. We take any allegation of abuse very seriously.
- We will follow the guidance of the Local Safeguarding Children Board when responding to any complaint that a member of staff has abused a child even in case of doubt.
- We will respond to any disclosure by children or staff that abuse by a member of staff may have taken, or is taking place, by first recording the details of any such alleged incident and establishing the facts before jumping to any conclusion.
- We refer any such complaint immediately to the LADO within 24 hours of a disclosure or suspicion of abuse.
- If we were given information that suggested that a member of staff was abusing a child who was not a pupil at Polwhele House we would immediately pass such information to the LADO to handle. We would then interview the member of staff and formally advise him/her of the allegations, making it clear that the school would not play any part in the investigatory process. He or she would be advised of the possibility of facing suspension, re-assignment to other duties etc. in exactly the same way as if the allegation has involved a school pupil. If the allegation subsequently proved to be unfounded he or she would be given the full support of the school.
- We will inform the member of staff concerned honestly of the allegation that has been made, and advise him or her to contact their Trade Union or Professional Association for advice and support.

- We will inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place, unless the allegation involves the parents, in which case we will contact the Social Services before making contact.
- If the facts suggest that there may be reasonable grounds for suspecting actual abuse or grooming of a child or other criminal behaviour, we will contact the police in order for them to conduct an investigation and consider suspending the member of staff or volunteer concerned.
- We co-operate entirely with any investigation carried out by Social Services in conjunction with the police.
- We recognise the importance of maintaining confidentiality and guarding against unwanted publicity while an allegation is being investigated or considered. We follow the guidance set out in KCSIE.
- Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Even so, it is a serious step and we will take legal advice beforehand and will normally only suspend a member of staff where there is serious risk of harm or further harm to the child; the allegations are so serious as to constitute grounds for dismissal, if proven; the police are investigating allegations of criminal misconduct.
- We recognise fully that we have a duty of care towards all of our staff and we will always keep an open mind until a conclusion has been reached, interview a member of staff before suspending him or her and keep him or her informed of the progress of the investigation.
- Any member of staff who is invited to a meeting whose outcome is likely to result in his or her suspension is entitled to be accompanied by a person of their choice. Staff who reside on-site who are suspended will be required to remain off-site for the duration of their suspension and will be provided with alternative accommodation.
- We will always consider an alternative to suspension including sending the member of staff on leave, giving them non-contact duties, ensuring that a second adult is always present when they are with children.
- The resignation of a member of staff or volunteer will not lead to the investigation being abandoned; every investigation into allegations of child abuse will be completed. No compromise agreement will be used in such a situation.
- We recognise that everyone's interests are served by completing any investigatory process as quickly as possible and we will aim to spend as little time as is compatible with fair and impartial processes on the investigatory process. We would expect almost every case to be completed within one month.
- Any person (whether employed, contracted, a volunteer or student) who has harmed, or poses a risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had he or she not left earlier will be reported to the Disclosure and Barring Service (DBS) promptly.
- Where a teacher has been dismissed for professional misconduct (or would have been dismissed had he/she not resigned first) consideration will be given to making a referral to the National College for Teaching and Leadership (NCTL).

13. Safer Recruitment

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures are set out in the School's Staff Recruitment and Selection Policy. This includes the requirement for every interview panel to include at least one person who has undertaken safer recruitment training.

13.1 Training

Induction and training are in line with advice from the LSCB.

All Staff

All new staff will be provided with induction training that includes:

- the safeguarding policy, including information about the identity and role of the DSL and DDSL
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media
- a copy of Part 1 of KCSIE
- School leaders and staff who work directly with children will also be required to read Annex A of KCSIE.

Copies of the above documents are provided to all staff during induction. Temporary staff and volunteers are provided with access to the school safeguarding policy.

All staff are also required to:

- Read Part 1 of KCSIE and confirm that they have done so. Each time Part 1 of KCSIE is updated by the Department for Education, staff will be updated on the changes via email.
- Understand key information contained in Part 1 of KCSIE. The School will ensure staff understanding through regular staff training.
- Receive training in safeguarding and child protection regularly, in line with advice from the LSCB. Training will include online safety. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails and staff meetings.

DSL

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children and training in the LSCB's approach to Prevent duties. Further details of the required training content for the DSL are set out in Annex B of KCSIE.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. The DDSL is trained to the same level as the DSL.

14. Guidance to Staff to avoid allegations of abuse

See Staff Code of Conduct.

15. Curriculum

We introduce key elements of safeguarding into our setting to promote the personal, social and emotional development of all children, so that they grow up to be 'strong, resilient and listened to' and so that they develop an understanding of why and how to keep safe. This work includes teaching children to keep safe online and in other settings.

16. Support to families

- Polwhele House believes in building trusting and supportive relationships with families, staff and volunteers in the group.
- The school will risk assess the situation with statutory agencies and keep the best interests of the child at heart.
- We follow the Child Protection Plan as set out by Social Services in relation to the school's designated role and tasks in supporting the child and the family, subsequent to any investigation that takes place.
- Confidential records are shared with the child's parents or those who have parental responsibility for the child in accordance with the procedure and only if appropriate under the guidance of the Local Safeguarding Children Board.
- With the provision that the care and safety of the child must always be paramount, the school will do all in their power to support and work with the child's family.

17. Handling unfounded or unsubstantiated allegations about staff:

17.1 The Child

A child who has been the centre of unfounded or unsubstantiated allegations of child abuse needs professional help in dealing with the aftermath. We will liaise closely with the LSCB to set up a professional programme that best meets his or her needs which may involve the Adolescent Mental Health Services and an Educational Psychologist as well as support from school staff. We shall be mindful of the possibility that the allegation of abuse was an act of displacement, masking abuse that is actually occurring within the child's own family and/or community. However much support the child may need in such circumstances, we need to be sensitive to the possibility that the aftermath of an unfounded allegation of abuse may result in the irretrievable breakdown of the relationship with the teacher and may conclude that it is in the child's best interests to move

to another school. We would do our best to help him/her to achieve as smooth a transition as possible, working closely with the parents/guardians.

17.2 The Member of Staff

A member of staff could be left at the end of an unfounded or unsubstantiated allegation of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues may feel there is 'no smoke without fire'. We recognise that he or she is likely to need both professional and emotional help. We will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the school community. A short sabbatical or period of re-training may be appropriate. In response to an allegation, suspension will not be the default option. An individual will only be suspended if there is no reasonable alternative. If suspension is appropriate the reasons and justification will be recorded and the individual notified of the reasons. Allegations that are found to be malicious will be removed from personnel records and not referred to in any employer references.

18. Whistle Blowing

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk. You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation. These feelings, however natural, must never result in a child or young person continuing to be unnecessarily at risk. Remember it is often the most vulnerable child or young person who is targeted. These children need someone like you to safeguard their welfare.

Don't think 'what if I'm wrong' - think 'what if I'm right'

18.1 Reasons for whistle blowing

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour
- To prevent the problem worsening or widening
- To protect or reduce risks to others
- To prevent becoming implicated yourself

18.2 What stops people from whistle blowing

- Starting a chain of events which spirals
- Disrupting the work or project
- Fear of getting it wrong
- Fear of repercussions or damaging careers
- Fear of not being believed

18.3 How to raise a concern

- You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken.
- Try to pinpoint exactly what practice is concerning you and why
- Approach any member of the Senior Management Team (Headmaster, Deputy Head, Bursar) or Richard and Rosemary White (Tel: 01872 261355; riwhite@talk21.com). If your concern is about your immediate

manager/Headmaster, or you feel you need to take it to someone outside the school, approach Richard or Rosemary White.

- Make sure you get a satisfactory response - don't let matters rest.
- Ideally, you should put your concerns in writing, outlining the background and history, giving names, dates and places where you can.
- A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern.

18.4 What happens next

- You should be given information on the nature and progress of any enquiries.
- Your employer has a responsibility to protect you from harassment or victimisation.
- No action will be taken against you if the concern proves to be unfounded and was raised in good faith.
- Malicious allegations may be considered as a disciplinary offence.

18.5 Self reporting

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

18.6 Further advice and support

It is recognised that whistle blowing can be difficult and stressful. Advice and support is available from your line manager, or your professional or trade union. *"Absolutely without fail - challenge poor practice or performance. If you ignore or collude with poor practice it makes it harder to sound the alarm when things go wrong."* (reproduced with acknowledgement to "Sounding the Alarm" - Barnardos)

19. The School's arrangements to fulfil other safeguarding responsibilities

19.1 Teaching children how to keep safe

The proprietors through the head ensure that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the School's curriculum and also embedded in PSHE and sex and relationships education (SRE).

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's

approach to online safety can be found in the School's IT & Home Agreement Policy.

19.2 Looked after children

The proprietors ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Mr Alex McCullough is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role (see Appendix 2 - Role of the Designated Safeguarding Lead).

19.3 Arrangements for Visiting Speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a school employee. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

20. Early Years provision safeguarding arrangements

20.1 Disqualification from working in childcare

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006, including by association with others. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Staff Recruitment and Selection Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified, including by association, or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from

which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

20.2 Use of mobile phones and cameras

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Staff Code of Conduct. Except in urgent or exceptional situations, mobile phone use is not permitted during teaching time, while on duty or when in the presence of pupils. Staff should not use personal devices for photography or video in school unless specifically authorised by the Headmaster.

20.3 DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Mr Alex McCullough.

Read and signed by
(Richard White, Chair of Managing Council)

Dated:

Created: April 2009

Reviewed: March 2010, March 2011, October 2011, November 2011, September 2012, Feb 2013 (SMT), Feb 2014 (SMT), Feb 2015 (SMT), April 2015 (SMT), September 2015 (SMT), October 2015 (SMT), September 2016 (AMcC), March 2017, April 2017, May 2017, October 2017, December 2017, January 2018

Review date: Annually, according to the school's policy review cycle

Related Polwhele House Policies that may be obtained from the School Office:

- See paragraph 18 for Whistle Blowing Procedures**
- Employment Policies and Procedures**
- Staff Induction Policy**
- IT Policy and Home Agreement**
- Data Protection and Use of Pupil Images Policy**
- Staff Code of Conduct**
- Anti-Bullying Policy**
- Policy for Pupils on Confidentiality Issues**
- Staff Recruitment & Selection Policy**

Useful Contact Numbers and Websites

Designated Safeguarding Lead (DSL) for whole school, including EYFS	Mr Alex McCullough 01872 273011 headmaster@polwhelehouse.co.uk
Deputy Designated Safeguarding Lead (DDSL) for whole school, including EYFS	Mrs Julie Keyes 01872 273011 jkeyes@polwhelehouse.co.uk
Member of Managing Council with responsibility for Safeguarding	Canon Richard White 01872 273011 riwhite@talk21.com
Truro Cathedral Safeguarding Officer	Emma Nicholls 01872 276782 emmanicholls@trurocathedral.org.uk
Cornwall and Isles of Scilly Safeguarding Children Partnership Third Floor, West Wing New County Hall Truro TR1 3AY	Contact: www.safechildren-cios.co.uk 01872 327225 safeguardingboards@cornwall.gov.uk Multi-agency Referral Unit: 0300 123 1116 Out of Hours Service: 01208 251300 Local Authority Designated Officer (LADO): 01872 326536
Children's Social Care	0300 1234 101 children@cornwall.gov.uk
Children Missing Education Team	01872 323400 cmeenquiries@cornwall.gov.uk
Elective Home Education	0300 1234 101 ehadmin@cornwall.gov.uk
School Admissions	0300 1234 101 schooladmissions@cornwall.gov.uk
Police	999 (emergency) 101 (non-emergency)
Steve Rowell MICJP Community Safety Officer (West) & Preventing Extremism/Terrorism Lead Cornwall Community Safety & Protection Cornwall Council Penzance One Stop Shop St Clare Penzance Cornwall TR18 3QW	01736 336587 07980 895104 steve.rowell@cornwall.gov.uk or Prevent@Cornwall.gov.uk or Steve.Rowell@cornwall.gcsx.gov.uk
DfE Prevent Duty Helpline	020 7340 7264 Counter-extremism@education.gsi.gov.uk
Jennifer Bourne RN, Queen's Nurse, ISVA, Counsellor, FGM Specialist	jenniferbourne@fgmeducation.co.uk or crasac.jenniferbourne@gmail.com
Early Support Lead (TAC): Crin Whelan	01872 323329

	cwhelan@cornwall.gov.uk
South West Child Protection Procedures	www.proceduresonline.com/swcpp/
NSPCC	www.nspcc.org.uk NSPCC Helpline: 0808 800 5000
Every Child Matters	www.everychildmatters.co.uk
Independent Listeners	Mrs Val Royston 01872 264690 07866 160781 Canon Lynda Barley 01872 273924 07720 593069
Childline	0800 1111
Children's Commissioner for England Sanctuary Buildings 20 Great Smith Street London SW1P 3BT	0800 528 0731
Operation Encompass (police and education early intervention safeguarding partnership which supports children and young people exposed to domestic abuse)	www.operationencompass.org

Appendix 1 – Signs and Types of Abuse

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 anotherⁱ.

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.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female

genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

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

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

So Called 'Honour Based' Violence: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM), forced marriage, and practices such as breast ironing. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the

DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence).

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Special Educational Needs and/or Disabilities: Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

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 SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Children who go missing from school: A child going missing from school is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found in the School's Missing Child and Late Collection Policy. All unexplained absences will be followed up in accordance with this policy.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

Appendix 2 - Role of the Designated Safeguarding Lead

Governing bodies, proprietors and management committees should appoint an appropriate senior member of staff, from the school or college leadership team, to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection. This should be explicit in the roleholder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings - and/or to support other staff to do so - and to contribute to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding lead(s). Any deputies should be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school or college's child protection policies are known, understood and used appropriately;
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child protection file

Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional

circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
