



KINGSWOOD
BATH

2.3 CHILD PROTECTION & SAFEGUARDING POLICY INCLUDING EARLY YEARS FOUNDATION STAGE

RESPONSIBILITY

Staff Member(s): Designated Safeguarding Leads, Senior and Prep Schools

Governor Committee: Board of Governors

REVIEW

Last Review date: September 2018

Next review date: September 2019

This policy applies to staff, volunteers and contractors working with pupils on School premises or away from the School on an activity, visit or other educational pursuit. The latter includes checking the staff of other organisations for their suitability as supervisors of Kingswood Pupils. The policy is in accordance with the procedures of the Bath and North East Somerset (B&NES) Safeguarding Children Board whose contact details can be found in Appendix 1. The policy also applies to the EYFS and to boarding.

The Kingswood School Foundation (which comprises Kingswood Senior School and Kingswood Preparatory School) places the safety and wellbeing of all its pupils as our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn and undertake educational activities in safety. Safeguarding and promoting the welfare of children includes protecting children from maltreatment and ensuring they are able to grow up in circumstances consistent with the provision of safe and effective care. Action will be taken to ensure all children have the best outcomes. 'Children' includes everyone in the School under the age of 18 years and within the Kingswood setting, this also includes pupils who are 18 years and above but still in full-time education.

Where a child is suffering significant harm, or is likely to do so, due to the behaviour of adults, immediate action will be taken to protect the child. This action may be prompted by allegations against both employees and non-employees. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are not at immediate risk, through inter-agency assessment using local processes, including use of the Common Assessment Framework (CAF) and Team Around the Child (TAC) approaches. *See local guidance on thresholds and procedures at www.bathnes.gov.uk/services/children-young-people-and-families/child-protection/local-safeguarding-children-board*

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to abuse by one or more pupils, a referral will be made to children's services. Where bullying is thought to have taken place but a child has not suffered significant harm or is not likely to suffer significant harm the School's anti-bullying policy will be followed. In all circumstances the welfare of the children concerned will be the first priority. In the event of disclosures about Peer-on-Peer abuse all children involved, whether perpetrator, victim or any other child affected, will be treated as being "at risk" and will be supported appropriately; this may include counselling or access to the Independent Listener or other agencies as required. In addition to this, any perceived bullying by staff or any other person in authority must be reported to the Designated Safeguarding Lead (DSL) and appropriate action will be taken in line with school policy.

In the case of pupils identified as being at risk of radicalisation, the School will consider the level of risk to identify the most appropriate referral, which could include Channel¹ or Children's Social Care.

Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, the School would not require their consent for a referral where there are reasonable grounds to believe that a child is at risk of serious harm.

¹ Channel provides support across the country to those who may be vulnerable to being drawn into terrorism. The overall aim of the programme is early intervention and diverting people away from the risk they may face. Channel uses existing collaboration between partners to support individuals and protect them from being drawn into terrorism. The process is a multi-agency approach with a wide range of agencies and local partners working together to provide support for individuals. Coordinators are usually police officers with the multi-agency panel being chaired by the Local Authority.

Staff need to be aware that where there are concerns about children being drawn into terrorism that normal referral processes need to be followed.

Both Schools recognise their responsibilities for child protection. All staff must be aware of the professional obligation laid upon them by the 1989 Children's Act and subsequent legislation and guidance, including the Education (Independent School Standards) Regulations 2014, also known as the registration standards or ISSRs, the Independent Schools Inspectorate Commentary on the Regulatory Requirements (September 2018), Working Together to Safeguard Children (July 2018), Keeping Children Safe in Education (September 2018) (KCSIE), Disqualification under the Childcare Act 2006, Prevent Duty Guidance: for England and Wales (July 2015) and the Education Act 2002, section 157.

Both Schools value their Christian ethos based on respect and mutual tolerance. Parents and guardians have an important role in supporting the work of the Foundation.

This policy will be reviewed by the Board of Governors at least annually and a copy of the policy will be provided on the Schools' websites. A record of this review will be created in the minutes of the Governors' meeting in each Summer Term.

The following policies and procedures are also relevant to the School's safeguarding practices:

- Code of Conduct for Staff
- Whistleblowing Policy
- Recruitment, Selection and Disclosure Policy
- Anti-bullying Policy
- Missing Pupil Policy
- ICT Acceptable Use Policy
- E-Safety Policy
- Pupil Behaviour Policy

There are five main elements to the policy:

1. Establishing a safe environment in which pupils can learn and develop;
2. Ensuring the governance of safeguarding and promotion of welfare is fully embedded within the Schools;
3. Raising awareness of child protection issues and ensuring that staff, volunteers and contractors working at the Schools are fully aware of presenting issues and how to act in the event of concerns being raised;
4. Ensuring staff recruitment practice is safe and fully accords with the requirements of Keeping Children Safe in Education (2018);
5. Supporting pupils who are in need of protection or require additional help to achieve good outcomes.

Every new member of staff, including part-timers, temporary, visiting or contract staff working in either School and every new Governor will receive induction training on this policy and expectations for effective safeguarding.

Child protection training will be provided and monitored for all staff who work with children on a regular basis and in accordance with the training requirements of the local safeguarding children board in terms of content and frequency.

Identifying abuse – what is abuse and neglect?

Through their day-to-day contact with pupils, School staff are well placed to observe any signs that a child may be suffering or is likely to suffer significant harm or is in need of additional support to promote their welfare. The Schools will therefore:

- establish and maintain an environment where pupils feel secure, are encouraged to talk and are listened to;
- ensure pupils know that there are adults in the School whom they can approach if they are worried through the system of form tutors, pastoral teams, school nurses and independent listeners;
- include opportunities in the curriculum for pupils to develop the skills they need to keep themselves safe from harm. This may involve classroom teaching through PSHCE and available online resources.

The following definitions are taken from ‘Working Together to Safeguard Children’, HM Government (2018):

- **Abuse**
A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.
- **Physical abuse**
Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse**
The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- **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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

- **Child Criminal Exploitation**

As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

- **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:

- a. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b. protect a child from physical and emotional harm or danger
- c. ensure adequate supervision (including the use of inadequate care-givers)
- d. ensure access to appropriate medical care or treatment

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

See Appendix II for characteristics and symptoms of child abuse or neglect.

Specific safeguarding issues

The Schools will seek expert professional advice on specific safeguarding issues relating to such matters as child sexual exploitation (CSE), body image, drugs, bullying, domestic violence, gangs and youth violence, faith abuse and matters linked to cultural customs or practices. These may include issues such

as honour based violence (HBV), FGM, forced marriage and breast-ironing. Staff will be made aware of issues associated with child on child abuse, consequential harm and the need to ensure that such matters are appropriately handled in the best interests of both the victim(s) and the alleged abuser(s).

In line with Department for Education guidance (KCSIE), staff must be aware of pupils who may be at risk of Child Sexual Exploitation, Radicalisation or Female Genital Mutilation (FGM) and report any concerns in line with this policy.

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on www.gov.uk/government/publications/female-genital-mutilation-guidelines.

In the case of FGM, from October 2015, it is mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss such a case with the School's DSL and involve children's social care as appropriate.

Staff must also be alert to the impact of bullying, cyber-bullying and behaviours that may place individual children at risk of serious harm, including children who go missing from School. Peer-on-peer allegations of abuse may include sexting (also known as Youth Produced Sexual Imagery), banter, sexual assaults and gender-based issues and these will be reported to local agencies as appropriate. In the event of disclosures about Peer-on-Peer abuse all children involved, whether perpetrator or victim, will be treated as being 'at risk'. Advice and support would be taken from local agencies about how best to support all parties.

It is important to note that the production and distribution of sexting images involving anyone under the age of 18 is illegal and needs very careful management for all those involved. The UK Council for Child Internet Safety (UKCCIS) have published a guide 'Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People.' In the event of a sexting incident, this advice will be followed; [full advice can be found here](#).

Staff should refer to the School's policy and procedure on Managing Allegations Against Other Pupils in Appendix IV.

It is recognised that missing pupils may be a potential indicator of abuse or neglect. The aim is to seek to identify any risk of abuse and neglect, including sexual exploitation, to help prevent the risk of children going missing in the future. In all instances where pupils are missing, the rubric of the School's Missing Pupil Policy and Pupils Missing from Education Policy will be applied. A copy of the policies can be found in the School Handbook.

The Counter Terrorism and Security Act (2015) & the Prevent duty

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.

- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

The Counter Terrorism and Security Act (2015):

This Act places a duty on specified authorities including schools, Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty).

The following definition of Extremism is taken from 'Working Together to Safeguard Children' HM Government (2018):

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

At Kingswood School, we are committed to supporting vulnerable students through our safeguarding policies and procedures and recognise that this will support the school's contribution to the Prevent duty.

As a Foundation, we build pupils' resilience to radicalisation by promoting fundamental British values and enabling our pupils to challenge extremist views.

The school has engaged positively with appropriate training to ensure all staff have the skills and knowledge to refer any concerns appropriately.

Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral. Mr Gordon Opie at the Senior School and Ms Helen Worrall at the Prep School provide the lead for the school on Prevent and can be contacted directly for any concerns or for clarification on process.

Special Educational Needs and Disability (SEND)

The Foundation recognises the particular vulnerabilities of those pupils with SEND and the additional barriers that can exist when recognising abuse and neglect in this group of children. Staff must be aware of this and ensure that any indicators of possible abuse are identified early and not assumed to be related with a child's SEND.

Other Safeguarding Responsibilities

The Foundation ensures that pupils are taught about safeguarding and online safety through the curriculum and PSHE/PSED. The Foundation ensures that all teaching materials are age appropriate and delivered through a planned part of the curriculum. Pupils are supported in understanding 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.

Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

The Foundation makes every effort to ensure that pupils are protected from online threats, access to inappropriate content is blocked and internet use on school networks is managed. Through the use of filtering software 'Fortinet' the Foundation aims to protect pupils from accessing terrorist and extremist material when accessing the internet through school systems. Through staff training and ICT policies all staff are aware of the need to report any concerns or breaches of internet safety.

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

Role and responsibility of Governors

The Governing Body is accountable for ensuring that the Foundation complies with its legal duties under relevant legislation. It is also responsible for ensuring that policies are fully implemented in practice and are reviewed for their effectiveness at least annually and that any deficiencies or weaknesses in child protection arrangements are remedied without delay. The nominated members of the Governing Body who will liaise with the local authority on issues of child protection or in the event of an allegation being made against the Headmaster or member of the Governing Body are Mrs Barbara Pendle and Mrs Helen Bools who are suitably trained in safeguarding and promotion of welfare.

Key tasks of the Governing Body include:

- an annual review of the Foundation's Safeguarding policy and procedures;
- ensuring the Foundation contributes to inter-agency working in line with 'Working Together to Safeguard Children (2018)' through the effective implementation of the policy and procedures in practice and good co-operation with local agencies;
- maintaining appropriate records for staff training and safe staff recruitment and vetting processes to underpin and inform the annual review of safeguarding arrangements.

Designated Safeguarding Lead(s)

The Governing Body has appointed a member of each School's leadership team to the role of Designated Safeguarding Lead (DSL). In the Senior School this is the Deputy Head, Mr Gordon Opie. Working with him is the Head of Boarding Miss Angie Wright. In the Preparatory School the DSL is the Deputy Head, Ms Helen Worrall. Working with her is Year 5 teacher Mrs Naomi Harding, who also has safeguarding responsibility for the children in the EYFS. Miss Angie Wright and Mrs Naomi Harding will work in concert with the Designated Person to liaise with local statutory children's agencies as appropriate. Furthermore, over the holiday periods, the Commercial Manager, Ms Sarah Hollingsworth, and the Assistant Commercial Manager, Mr Euan Gordon, also form part of the DSL team. The respective Headmasters, Mr Simon Morris for the Senior School and Mr Mark Brearey for the Preparatory School, have a role of oversight and operating in concert with and supporting the above as necessary.

The designated persons will receive updated appropriate inter-agency training in accordance with locally agreed procedures at least every two years.

The Foundation Medical Centre nurses hold a copy of 'Child Protection; Guidance for Senior Nurses, Health Visitors and Midwives' (HMSO) and staff working there are fully conversant with and use its guidance where relevant in the School setting. The nurses will be invited to participate in any School INSET concerned with safeguarding and the promotion of child welfare.

The role and responsibilities of the designated staff are contained in Appendix III.

Reporting concerns about a child

All adults have a duty to safeguard the welfare of pupils. If any member of staff or volunteer has a concern that a child may be suffering significant harm, is likely to suffer significant harm or is in need of additional support to promote their welfare, then the member of staff or volunteer must arrange to meet or make contact with the School's DSL immediately. The DSL will take advice from the local response team and, where asked to do so, will make a referral to children's social care in accordance with local protocols, including taking advice on borderline cases. **Such contacts must be made without delay where there is a risk of immediate serious harm to a child.**

The Foundation recognises the importance of early help and all staff are made aware of this during training. Staff must be prepared to identify children who could benefit from early intervention.

It should be noted that anyone can refer children directly to children's service, including parents. See the contact details and website links in Appendix I. Parental consent is not required for referrals to statutory agencies.

If a member of staff feels the need to make a direct referral the School's DSL should be informed of this as soon as possible.

In February 2016 the NSPCC launched a new whistleblowing advice line for professionals. All professionals with concerns over how child protection issues are being handled in their own or another organisation, can talk to the NSPCC anonymously on 0800 028 0285.

Children's social care services will determine the nature of any investigations or assessments in accordance with sections 47 and 17 of the Children's Act 1989.

Governors must ensure that procedures exist so that the child's wishes and feelings are taken into consideration when determining the actions to be taken and what services are required to ensure protection. Staff must never promise confidentiality to the child and must always act to ensure that the interests of the child are paramount.

All parties should note the importance of children receiving the right help at the right time to address risks and prevent issues escalating. Early referral of signs of abuse, neglect and radicalisation is emphasised. Clear records must be kept, the child must be listened to and concerns reassessed if the situation does not improve. It is important to share information quickly and challenge inaction.

The Foundation has clear whistleblowing policy and procedures, which can be found in the Staff Handbook. Staff are also provided with a hard copy of the Whistleblowing Policy as part of their induction. The Foundation promotes a culture of safety and of raising concerns and one where staff are valued and practices are reviewed regularly.

Guidance in handling concerns raised by children

- a) Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding 'leading' the pupil or adult who has approached you by making suggestions or asking questions that introduce your own ideas about what may have happened.
- b) Stop asking questions as soon as the pupil or adult has disclosed that he or she believes that something abusive has happened to the pupil or to someone else.
- c) Tell the pupil or adult that you will now make sure that the appropriate people are brought in to follow the problem through.
- d) Try to ascertain the wishes and feelings of the pupil or adult at this point if appropriate, but remember that what they want to happen may not be possible.
- e) Do not promise confidentiality.
- f) Refer the matter immediately, with all the relevant details, to the DSL or their Deputy
- g) Make an accurate written record as soon as possible (ideally within one hour) of what you have been told using the **Child Protection Notification Form** and pass this to the DSL or Headmaster.

Allegations of abuse made against teachers and other staff

Where it is alleged that a teacher, member of staff or volunteer has behaved in a way that has harmed a child, may pose a threat to a child, has possibly committed a criminal offence against a child, or there is any suggestion that they may be unsuitable to work with children, then the matter must be reported immediately to the Headmaster. This includes any allegations against the DSL. The Headmaster must then, without delay (within one working day) contact the Local Authority Designated Officer (LADO) to discuss the concerns. The LADO, in conjunction with children's services and/or the police will then confirm the arrangements for investigating the issues raised. The Foundation will fully comply with these arrangements, including maintaining appropriate levels of confidentiality. Where a child has suffered serious harm the police must be contacted from the outset. The Foundation will not undertake any investigation of its own without prior consultation with the LADO.

In the absence of the Headmaster, or if the allegations concern the Headmaster, the initial report must be made to the Chair of Governors or the nominated Governor representative for safeguarding who will then be responsible for notifying the LADO. In the latter situation, the report is made without informing the Headmaster.

The Foundation maintains a Staff Code of Conduct which provides guidance to staff and volunteers about their behaviour and actions so as to not place pupils and staff at risk of harm or of allegations of harm to a pupil. This is issued to staff and volunteers and can be found in the Staff Handbook. This offers further guidance on matters such as one-to-one teaching.

Where a member of staff, volunteer, student or contractor is deemed to be unsuitable to work with children, a prompt report will be made to the Disclosure and Barring Service (DBS) where DBS referral criteria are met, that is they have caused harm or pose a risk of harm to a child.

Where a teacher is dismissed or would have been dismissed if they had not resigned, a report will be made to the Teaching Regulation Agency as a prohibition order may be appropriate. The reasons such an order would be considered are: unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence.

More detailed guidance on handling such allegations is to be found in the separate document 'Procedures for dealing with allegations of abuse made against teachers and other staff', which is held by the Headmaster and Chair of Governors.

In all cases where there is an allegation of abuse made against teachers or other staff the Foundation will aim to investigate and resolve matters without unnecessary delays for the benefit of all concerned.

Staff recruitment and vetting policy

A copy of the Foundation's recruitment, selection and disclosure policy and procedure can be found on the website or on request from the HR Department.

As required by *Prevent*² the Foundation has a clear procedure for visiting speakers, whether invited by staff or by the pupils themselves, to ensure that they are suitable and appropriately supervised. A risk assessment form must be completed in advance of the visit; forms are available on request from the School Office.

Early Years Foundation Stage (EYFS)

Reporting Requirements

Ofsted will be informed within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

Use of Mobile Phones and Cameras

Kingswood Preparatory School recognises the need to respect children's and parents' rights of privacy and is aware of potential child protection issues.

It is recognised that there have been significant advances in mobile devices and wireless technology (including telephones and tablets), many of which have integral cameras, videos and recording capabilities. In order to ensure that the dignity, privacy and confidentiality of children and families at KPS are not compromised, we recognise the necessity for policy and guidance on the use of such devices.

At KPS, we recognise that staff, students, volunteers and visitors may wish to have their personal mobile phones or devices on school premises, for use in case of emergency. However, these must not be used where there are children present and they must be stored in bags, for use at break-time; in the staffroom. Failure to do this will result in a formal disciplinary process.

However, the safeguarding of children within our school is paramount. It is our intention to provide an environment in which children, parents and staff are protected from images being recorded without prior consent. It is also our intention to ensure that staff, students and volunteers are not distracted from their work with children.

Kingswood Preparatory School's Policies and guidance on the Safe Use of Images of Children and the Use of Mobile Phones and Devices are available on request.

Safeguarding within EYFS

Mrs Naomi Harding will take lead responsibility for safeguarding children in the setting.

Childcare Disqualification Requirements

The Childcare Act 2006 (**Act**) and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (**Regulations**) state that is an offence for the School to employ anyone in connection with our early years provision (EYP) or later years provision (LYP) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP.

² From 1 July 2015 all schools, registered early years childcare providers and registered later years childcare providers (referred to in Department of Education advice as 'childcare providers') are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

The School will take all necessary steps to ensure that appropriate checks are undertaken in line with Department for Education statutory guidance and will remind staff on an annual basis of their duty to disclose the relevant information under the Act should their personal circumstances change.

Boarding

The Foundation carefully monitors pupil relationships and the potential for abuse by peers within the boarding provision.

Where a member of the boarding staff is suspended pending an investigation of a child protection nature, alternative accommodation will be provided away from children.

The Role of the Charity Commission

The Charity Commission is playing an increasingly important role in safeguarding all those who come into contact with charities, including schools. They have adopted a definition of safeguarding which extends beyond the protection of children to the protection from harm of all those connected with the activities of the charity. Where appropriate, the Foundation and its staff have a responsibility to report concerns they may have about the welfare of pupils, beneficiaries, staff, volunteers and others, so that we can ensure these concerns are properly managed and those affected supported. This may include a report of a 'serious incident' to the Charity Commission, which requires trustees to report suspicions, allegations or incidents of abuse involving pupils or other beneficiaries to them. All staff should also feel able to raise any concerns they may have about the schools' safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

APPENDIX 1
Key contact details

SENIOR SCHOOL		
Designated Safeguarding Lead	Mr Gordon Opie	01225 734212 / 07850 620985 gdo@kingswood.bath.sch.uk
Deputy Designated Person	Miss Angie Wright	07436 168780 atw@kingswood.bath.sch.uk
Headmaster	Mr Simon Morris	01225 734202 headmaster@kingswood.bath.sch.uk

PREPARATORY SCHOOL		
Designated Safeguarding Lead	Ms Helen Worrall	07730 209483 / 01225 734563 hworrall@kingswood.bath.sch.uk
Deputy Designated Person and Lead for EYFS	Mrs Naomi Harding	NH@kingwood.bath.sch.uk
Headmaster	Mr Mark Brearey	01225 734463 kpsheadmaster@kingswood.bath.sch.uk

KPS ACTIVE		
Designated Safeguarding Lead	Mrs S Hollingsworth	01225 734308 / 07920 482488 SAH@kingswood.bath.sch.uk
Deputy Designated Person	Mr Euan Gordon	01225 734309 / 07738 104464 EDG@kingswood.bath.sch.uk

GOVERNING BODY		
Chair of Governors	Mr Tim Westbrook	01225 338263 twestbrook@kingswood.bath.sch.uk
Nominated Governor for child protection	Mrs Barbara Pendle	07913 235920 bpendle@kingswood.bath.sch.uk
Nominated Governor for child protection	Mrs H Bools	hbools@kingswood.bath.sch.uk

EXTERNAL		
Local Authority Designated Officer (LADO)	<p>Francesca Hepden - Independent Chair/LADO</p> <p>Mel Argles – Deputy Safeguarding Lead for Children and Quality Assurance</p>	<p>LADO@bathnes.gcsx.gov.uk</p> <p>01225 396804 (Mon, Tues, Wed, Fri)</p> <p>01225 396810 (Thurs)</p>
Local Safeguarding Children Board Children's Services – B&NES		<p>01225 396339</p> <p>Lesley_Hutchinson@bathnes.gov.uk</p>
Children & Families Duty and Assessment Team		01225 396312 / 396313
BANES Emergency Out of Hours Duty team		01454 615165
Local Authority Prevent Lead		awaiting details from B&NES
Prevent Team Avon and Somerset Police		<p>0117 9455536</p> <p>channelsw@avonandsomerset.pnn.police.uk</p>
Local Police Force	Non-emergency Police	101
DfE telephone helpline and mailbox for non-emergency advice for staff and governors		<p>020 7340 7264</p> <p>counter-extremism@education.gsi.gov.uk</p>
Ofsted		0300 123 1231
Independent Schools Inspectorate (ISI)		020 7600 0100
Disclosure and Barring Service (DBS)		0870 909 0811
Charity Commission	Guidance	RSI@charitycommission.gsi.gov.uk
Teaching Regulation Agency (formerly NCTL)		0345 609 0009

www.bathnes.gov.uk/services/children-young-people-and-families/child-protection

APPENDIX II

Signs of abuse and neglect

HM Government Guidance: What to do if you're worried a child is being abused (Advice for Practitioners)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

A child may be experiencing abuse if he or she:

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

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

Signs and behaviours which may indicate that a child is being abused

- repeated minor injuries
- children who are dirty, smelly, poorly clothed or appear underfed
- children who have lingering illnesses which are not attended to, deterioration in their school work or significant changes in behaviour, aggressive behaviour, or 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 inappropriate for the child's age), open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home or is kept away from school for no apparent reason
- a child who does not trust adults, particularly those who are close
- 'tummy pains', with no medical reason
- eating problems, including over-eating, or loss of appetite
- disturbed sleep, nightmares and bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour
- relationships between the child and adults which are secretive and exclude others
- pregnancy
- breaks to limbs and/or bruises in non-mobile babies

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

APPENDIX III

The role and responsibilities of the Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) for child protection will ensure that their role is carried out according to the guidance contained in 'Keeping Children Safe in Education' (2018). They will ensure the operation of safe recruitment procedures, including DBS checks and compliance with Independent School Standards regulations. The role of the DSL is an operational one and now includes on-line safety

The broad areas of responsibility for the designated safeguarding lead are:

Managing referrals

- Referring all cases of suspected abuse to the local authority children's social care and:
 - The designated officer(s) for child protection concerns (all cases which concern a staff member),
 - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
 - Police (cases where a crime may have been committed).
- Liaising with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Training

- The designated safeguarding lead should receive appropriate training carried out every two years in order to:
 - Understanding the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
 - Having 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.
 - Understanding local inter-agency working protocols and training in the LSCB's approach to *Prevent* duties.
 - Ensuring each member of staff has access to and understands the school's child protection policy and procedures, especially new and part-time staff.
 - Being alert to the specific needs of children in need, those with special educational needs and young carers.

- Identifying children at risk of radicalisation.
- Being able to keep detailed, accurate, secure records of concerns and referrals.
- Obtaining access to resources and attend any relevant or refresher training courses.
- Encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raising Awareness

- The designated safeguarding lead should ensure the school's policies are known and used appropriately:
 - Ensuring the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this.
 - Ensuring 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 in this.
 - Linking with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
 - Where children leave the school ensuring 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. Efforts are also to be made to ensure that information is shared to enable the new school to have support in place when a child arrives and ensure key staff, such as the SENCO, are aware of any needs.
 - When a child joins the Foundation from another setting or School, the DSL should ensure that all appropriate records, including child protection and SEND records are received to enable appropriate support for the child and family.

The DSL takes specific responsibility for child protection matters in their School and is responsible for:

- Being fully conversant with B&NES Children's Board Child Protection Procedures and ensuring that the Senior Management Team and members of the pastoral team are aware of them
- ensuring that the School follows the procedures through maintaining ready contact with the social services
- holding and being conversant with the Foundation's copy of 'Working together to Safeguard Children (2018) - a guide to arrangements for inter-agency co-operation for the protection of children from abuse'
- being conversant with appropriate sections of the Children Act 1989 and sections 11 & 157 of the Education Act 2002

- making the above publications and any similar relevant documentation available to the Headmaster, Governors, other child protection staff and the Foundation nurses as appropriate
- briefing staff about the relevant contents of the Foundation's child protection guidance and procedures, including the briefing of new staff and Governors as part of their induction after arrival at the School, together with informing all support staff who have contact with pupils
- ensuring that all staff, including temporary and volunteers are provided with induction training that includes, the Foundation's Child Protection and Safeguarding Policy including the role of the DSL and deputies; the Staff Code of Conduct including use of social media/online safety, Pupil Behaviour Policy, the Foundation's response to Children Missing Education, the Whistleblowing Policy; the Acceptable Use of IT Policy (AUP); the identity of the Designated Safeguarding Persons and the instruction to read Part 1 of Keeping Children Safe in Education (September 2018) (KCSIE). All new staff will be provided with copies of: the Foundation's Child Protection and Safeguarding Policy, Staff Code of Conduct, Children Missing Education Policy, Whistleblowing Policy, Part one of KCSIE and the Role of the DSL/DDSL. All of the documents must be read and a signed declaration is kept to reflect this. Relevant staff will also be provided with KCSIE Annex A, which applies to all school leaders and those who work directly with children.
- staff will be required to demonstrate their understanding of KCSIE. In order to evidence their knowledge they may be required to complete additional training which may be online or in the form of questionnaires.
- ensuring that all staff receive appropriate safeguarding and child protection training which is regularly updated at the start of term staff meetings. In addition to this, information and updates will be circulated when necessary i.e. KCSIE Part One updates etc.
- in liaison with the School Office ensuring that the Headmaster, members of staff and volunteers in regulated activity receive regular child protection training
- ensuring that child protection procedures are followed within the Foundation
- liaising over child protection procedures with the social services department
- with the knowledge and agreement of the Headmaster, communicating to the local social services any reports of alleged or suspected child abuse within the School or reported by a pupil relating to incidents at home or outside the Foundation
- ensuring that, in the event of the Headmaster referring an allegation of child abuse through the DSL to the B&NES social care team, other actions (such as protecting the victim of the alleged abuse) are carried out
- encouraging a rolling programme of training in child protection matters at the Foundation, delivered by a variety of routes as appropriate. Ensuring that all staff receive updated training as recommended by B&NES to include *Prevent* awareness training in line with advice from the LSCB.
- Reporting formally at least once a year to the Governing body on child protection issues
- ensuring that any deficiencies or weaknesses in child protection arrangements are remedied without delay
- ensuring that all teaching staff complete online Prevent/Channel training.

APPENDIX IV

Managing Allegations of Peer-on-Peer abuse

At Kingswood Foundation we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other pupils. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the Foundation's behaviour policies.

All staff should recognise that children are capable of abusing their peers. All staff should be clear about the Foundation's policy and procedures with regard to peer on peer abuse.

It will be made clear to all pupils that abuse is abuse; it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

Procedure to minimise the risk of Peer-on-Peer Abuse

As a Foundation we will minimise the risk of peer-on-peer abuse by:

- Ensuring that Foundation staff are trained to recognise the signs of Peer-on-Peer abuse and that they understand their responsibility in this regard.
- Providing a developmentally appropriate PSHE/PSED syllabus which develops pupils understanding of acceptable behaviour and keeping themselves safe, which recognises the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously. Syllabuses will recognise the different forms peer on peer abuse can take, such as:
 - sexual violence and sexual harassment.
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexting (also known as youth produced sexual imagery)³and
 - initiation/hazing type violence and rituals.
- Having systems in place for any pupils to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils.

Procedure for the recording, investigation and action following allegations of Peer-on-Peer abuse:

- When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed.

³ [The Foundation follows the UK Council For Child Internet Safety's approach to Sexting/Youth Produced Sexual Imagery.](#)

- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- The DSL should contact the local response team to discuss the case. The DSL will follow through the outcomes of the discussion and make a referral where appropriate. This could include Team Around the Child (TAC) support.
- If the allegation indicates that a potential criminal offence has taken place, Children's Social Care will refer the case to the multi-agency agency safeguarding hub where the police will become involved. Pupils can also be put in contact with Victim Support (Tel: 0808 1689111)
- Parents, of both the pupil being complained about and the alleged victim, should be informed and kept updated on the progress of the referral.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils' files.
- It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures.
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.