



children's social care). This may lead to a written plan to support a child in need being drawn up or an early help assessment, such as the Common Assessment Framework, being carried out. In either case, the School will liaise and take advice from external agencies as appropriate.

A new paragraph in KCSIE (Sept 2018) (52) has been added to address **contextual safeguarding**. This means assessments of children should consider the wider environmental factors affecting the child's life that may pose a threat to their safety and/or welfare. Schools are encouraged to provide as much contextual information as possible as part of the referral process.

If a member of staff is made aware of **any** allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth. On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.

Every member of staff, including part-time staff, temporary, visiting, contract and volunteer staff working in School should report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to the DSL and submit an accurate written record of the disclosure or concerns. However, any staff member can make a direct referral to children's social care or other external services such as early help services in accordance with the referral threshold set out by OCSB.

Where staff have concerns that a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. **Anyone** can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL that a referral has been made as soon as possible. Staff must share information with children's social care and/or the police where there are any concerns that a child may be at risk of harm or neglect.

In Boarding schools staff need to be aware that children can be particularly vulnerable and that schools should be alert to pupil relationships and the potential for peer abuse particularly in schools with a significant gender imbalance. Guidance and policies can be viewed in the staff handbook and on the website. [Link to Anti-Bullying Policy](#)

If staff members are unsure about whether or not a referral should be made, they should speak to the DSL. The DSL will contact the Designated Officer (DO) for advice or direction and will inform Ofsted if appropriate.

The DSL will refer **all** allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the designated officer (LO) immediately, or within 24 hours at the latest.

Borderline cases will be discussed with the Locality and Community Support Services (LCSS) in the first instance (no names referral), the DO or the designated social worker without identifying individuals and following discussions the DO will judge whether or not an allegation or concern meet the relevant threshold. The DO will decide in the circumstances what further steps should be taken.

Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where a child's situation does not appear to be improving, the School will follow this up with the children's social care and push for reconsideration where appropriate. Any member of staff who has concerns that a child's situation does not appear to be improving should press for re-consideration.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with social services and the police.

With regard to the Prevent Duty, the School will co-operate with Channel panels and the Police with assessments are being undertaken.

In the case of pupil-on-pupil abuse which the School has reported to the DO and which the DO or statutory child protection authority decides to investigate further, the matter will be dealt with under the school's Discipline Policy after discussion with the DO.

Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must firstly raise this with the Head or DSL without delay. The Head or DSL will consult with external agencies, as appropriate in accordance with this policy. Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to children's social care or the police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with children's social care or the police what information can be disclosed.

The DSL will report safeguarding concerns to the Head (provided they do not concern the Head).

The School's local authority Oxfordshire operates the Oxfordshire Safeguarding Children Board (OCSB).

#### Points of contact are as follows:

#### **External Agency Contact Information**

OSCB [oscb@oxfordshire.gov.uk](mailto:oscb@oxfordshire.gov.uk)

[www.oscb.org.uk](http://www.oscb.org.uk)

MASH (for immediate concerns) 0345 0507666

Designated Officer (DO) Alison Beasley Tel no 01865 815956

Locality and Community Support Service (LCSS) 0345 2412608

General office - 01865 810603

Out of Hours Emergency Duty Team – 0800 833 408

Police Emergency - 999

Police Non-Emergency - 101

#### **OFSTED Safeguarding Children**

08456 404046 (Monday to Friday from 8am to 6pm)

[Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

#### **Extremism:**

Department for Education dedicated helpline for staff and governors: 020 7340 7264 and

[counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

Other useful contacts

### Disclosure and Barring Service

PO Box 181, Darlington, DL1 9FA

Tel: 01325 953795

### National College for Teaching and Leadership

[Tel: 0345 609 0009]

### DESIGNATED SAFEGUARDING LEAD

Mr Brown, Deputy Head Pastoral is our DSL. His contact details are:

0118 940 5230 (internal extension 230) or 07976 921120 nbrown@shiplake.org.uk.

He has been fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in Annex B of Keeping Children Safe in Education (Sept. 2018). He is a member of the senior leadership team at Shiplake.

Sarah Krause (i/c PSHEE) and David Rose (Hsm of Welsh) are the DSL's deputies. Their contact details are as follows:

Krause 790/07958 578311 skrause@shiplake.org.uk,

Rose 836/07890 430523 drose@shiplake.org.uk

The deputies are trained to the same level as the DSL.

Both the DSL and his deputies undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSL and his deputies will also attend refresher updates at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role. They have a job description for their safeguarding roles and key activities. The DSL role is to ensure that each member of staff has access to and is aware of and understands the School's safeguarding policy and procedures. Their training meets the requirements of the DfE's 'Keeping Children Safe in Education' (Sept 2018) (KCSIE). **Guidance from this document (Annex B) can be found here.** The DSL has ultimate responsibility for safeguarding and child protection in the School. This responsibility should not be delegated.

The DSL and/or the deputy DSLs can be contacted at any time (during school hours) for staff in School to raise or discuss any safeguarding concerns. Boarding staff have an emergency contact telephone number for the DSL and his deputies in all boarding houses. Out of term, the mobile numbers of the DSL and deputies will be used if required.

The DSL maintains close links with the Oxfordshire Safeguarding Children's Board (OSCB) and reports termly to the Education and Welfare Committee of the Governors on the child protection issues outlined above. The DSL will make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. The DSL will also make prompt contact with the Designated Officer (DO) in relation to allegations against someone working at the School and/or the police if a criminal offence is suspected.

The DSL will liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children 2015 and attendance at strategy meetings. The DSL will work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet.

The DSL receives focused training to support learning and understanding of the ever changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation. The DSL will undertake Prevent awareness training to enable him to provide advice and support to staff on protecting children from the risk of radicalisation. The DSL's and the School's focus is to support children in need through seeking early help and/or inter agency working, including using the Team around the Child Approach and/or the Common Assessment Framework.

The School's records on child protection are kept securely in the DSL's office, and are separated from routine pupil records. Access is restricted to the DSL, Deputy DSL and the Head.

Mr Peter Blewett is the liaison governor for safeguarding issues. The role of the designated governor is to liaise with the local authority on issues of child protection or in case of allegations against the Headmaster or a member of the Governing Body. The Governors, in conjunction with the Designated Safeguarding Lead (DSL), carry out an annual review of the School's safeguarding policy and procedures with day-to-day issues being delegated to the Education and Welfare Committee, which both the Headmaster and the DSL attend. The governing body is responsible for:

- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay; and
- approving amendments to safeguarding arrangements in the light of changing Regulations or recommended best practice.

### INDUCTION AND TRAINING

Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the School, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or the Head and, if required, to the main points of local procedures of OSCB ([www.oscb.org.uk](http://www.oscb.org.uk)) or, in certain circumstances, the police. Child Protection training is also given to new governors and volunteers. The particular training arrangements for the prevention of radicalisation is undertaken alongside regular safeguarding training. All staff are also required to complete an on-line training module (Educare) in Prevent Duty.

Training in child protection and safeguarding is an important part of the induction process. All new staff are briefed by the DSL and will attend full safeguarding training (OSCB approved) within their first term. Induction training includes:

- a review of the School's safeguarding policy including the staff code of conduct policy/behaviour policy, and the School's whistleblowing policy; and
- the identity of the DSL.
- "What to do if..." safeguarding advice
- Reading Part 1 and Annex A of KCSIE (Sept 2018)
- On line training

Training also promotes staff awareness of child sexual exploitation, Prevent (including referrals to Channel programmes), so called 'honour based' violence, forced marriage and female genital mutilation. Training on the early help process and process for making a referral to children's social care and for statutory assessment that may follow a referral (including what role they may be expected to play in such an assessment) will also be

provided together with the importance of maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action *without delay* if such a practice is suspected.

All new staff must read and sign to confirm that they have read Part 1 of KCSIE (Sept. 2018) and the relevant school policies listed in our Induction of New Staff in Child Protection policy. Temporary staff and volunteers will be provided with the same information.

The Head and all staff receive appropriate safeguarding and child protection training which is regularly updated in line with advice from the OSCB. In addition, the Head and all staff receive safeguarding and child protection updated as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively. This is delivered at INSET at the start of each term and in a bulletin produced by the DSL.

The DSL and deputy DSLs undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSL and his deputies will also receive regular updates as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role.

#### STAFF OBLIGATIONS

All staff in our School are required to notify the School immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration including 'by association' i.e. they live in the same household (or someone is employed in their household) as someone who has unspent cautions or convictions for a relevant offence (please see a list of the relevant offences set out here: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/384712/DBS\\_referrals\\_guide\\_-\\_relevant\\_offences\\_v2.4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/384712/DBS_referrals_guide_-_relevant_offences_v2.4.pdf))

The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the HR Administrator, Moya Flynn immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff who are disqualified from childcare or registration, including 'by association', may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the HR Administrator for more details.

#### CHILD'S WISHES

Where there is a safeguarding concern the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. The School manages this by allowing pupils to talk to adults with whom they feel most comfortable and also by providing various opportunities for pupils to discuss issues with peers and staff alike, in Tutor Periods, Forums and more informal arenas. The School will operate processes with the best interests of the pupil at their heart.

#### TRANSPARENCY

Shiplake College prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting Shiplake College. Copies of this policy, together with our other policies relating to issues of child protection are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the School. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

#### SAFER EMPLOYMENT PRACTICES

Shiplake College follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. Please also see the School's recruitment, selection and disclosures policy and procedure, recruitment pack, policy on induction of new staff, governors and volunteers in child protection and model staff behaviour policy.

The school ensures that there are sufficient relevant staff trained in safer recruitment processes.

In line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE Sept. 2018), the governing body prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors or consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.

The School works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

As part of carrying out our safe recruitment procedures under KCSIE, 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 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.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Further checks will also include a check for information about any teacher sanction or restrictions that an EEA professional regulating authority has imposed. Those undertaking management posts will be subject to prohibition from management of independent schools checks.

All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at School or on another site.

Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

This policy is reviewed by governors annually. Please also refer to the School's Recruitment Policy for further details.

We recognise that the School plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays

in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

#### PROCEDURES FOR MANAGING ALLEGATIONS OF ABUSE AGAINST STAFF, VOLUNTEERS AND THE HEAD

The School's procedures for dealing with allegations against any staff member (and volunteers who work with children) aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from vexatious allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

The School will liaise with the DO, police and social services as to managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Head and DSL) and volunteers follows Departmental guidance and OCSB arrangements and apply when staff, including volunteers, have (or alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil;
- Possibly committed a criminal offence against or related to a pupil; or
- Behaved towards a pupil in a way that indicated that they would pose a risk of harm if they were to work regularly or closely with children.

In line with the Whistle blowing policy, all allegations made against staff are to be directed to the Head (who may delegate to the DSL). In the Head's absence, concerns are directed to the Chairman of Governors. Should the allegation be against the Head or a school governor the Chairman of Governors should be contacted without the Head or school governor being informed first. It will be the Chairman's responsibility to contact the DO.

If the allegation concerns a member of staff, the Head or a volunteer he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the DO is known. Advice will always be sought from the DO first, however. The School will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it) or malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice. A copy will only be provided to the individual concerned following consultation with appropriate agencies and agreement has been reached as to what information can be disclosed. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references.

If the DO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children. The School recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.

During the course of the investigation the School in consultation with the DO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Allegations against a member of staff who is no longer at the School (including historical allegations) should be referred to the police.

Any pupils who are involved will receive appropriate care.

Staff should also have regard to the Staff Behaviour Policy to minimise the risk of allegations being made.

#### WHISTLEBLOWING

If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy. Concerns regarding the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm may be dealt with in accordance with the School's Managing Allegations of Abuse against staff procedure (see above). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Concerns are taken, in the first place to the Headmaster (who may delegate to the DSL). In the Headmaster's absence, concerns are directed to the Chairman of the Governors.

If staff and volunteers feel unable to raise an issue with the School or feels that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline (tel: 08000280285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)). Link to Whistleblowing Policy

#### EXTERNAL REFERRALS

We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the DO, schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Shiplake College will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School will consider making a referral to the National College for Teaching and Leadership (NCTL) as required by sections 141D and 141E of the Education Act 2002 and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

From October 2015, section 5B of the Female Genital Mutilation Act 2003 placed a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the School's designated safeguarding lead and involve children's social care as appropriate.

Should historical allegations of child abuse be made against a teacher who is no longer teaching, the School will, in accordance with Keeping Children Safe in Education, report the matter to the police. Similarly, allegations against a teacher who is no longer working at the School will also be referred to the police. All allegations of historical abuse should be referred to the Head or DSL straight away.

## PARENTS

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Head who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the LADO.

## PROMOTING AWARENESS

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our Anti-Bullying Policy.

Time is allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding, as are School and House Council meetings and Forums.

All pupils know that there are adults to whom they can turn to if they are worried, including the School counsellor, House staff, the chaplain and the medical staff. If the School has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- All pupils have access to a telephone helpline enabling them to call for support in private.
- Our medical wing [and all our boarding houses] displays advice on where pupils can seek help. These include numbers for the Children's Commissioner, Childline and our Independent Listeners.
- We operate a Peer Support scheme whereby trained older pupils are encouraged to offer advice and support to younger pupils.
- We provide leadership training to our all our senior pupils which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils. School Prefects have enhanced training.
- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying please refer to the School's anti-bullying policy. E-safety to pupils is addressed regularly in assemblies, lectures, tutor meetings and PSHEE lessons. Links to Anti-Bullying and Anti-Cyber Bullying Policies

Our Prefect system is overseen by the Deputy Head Pastoral. They have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, prefects are given induction on appointment which includes how to contribute to the School's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse.

## POSITION OF TRUST

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer the School's Staff Handbook which also includes its Social Media Policy.

## RECORDS

All concerns, discussions and decisions (with reasons) made in accordance with this policy will be recorded in writing and kept apart from general staff/pupil records, securely, by the DSL.

## MONITORING AND EVALUATION OF THIS POLICY

The School monitors and evaluates its safeguarding policy and procedures through the following activities:

- Governing body visits to the School;
- Staff with safeguarding experience contribute to the writing of this policy.
- Senior leadership team discussion sessions with children and staff
- Pupil questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the School [e.g. sufficient account must be taken of the nature, age range and other significant features of the School, such as historical issues, in the provisions made for safeguarding].
- Frequent scrutiny of governing body meeting minutes
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the senior leadership team and the governing body
- Regular review of parental concerns and parental questionnaires
- Regular review of the use of pupil-specific leisure rooms and clubs at lunchtime and after school
- Regular review of training offered to staff, including e-safety training.

Appendix: Schools should include an appropriate child protection fact sheet identifying the definitions and signs of child abuse such as the one produced by the NSPCC here: <https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/> Schools should also insert the KCSIE definitions of abuse: ( <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>) see Annex A and pages 11 - 13 and Annex A.

## TYPES OF ABUSE AND NEGLECT (Taken from KCSIE page 11).

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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 (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

### 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 over protection 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, 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 ISSUES:

For all of the following types of abuse and neglect specific advice on signs and recognition are available in the KCSIE document. These are also covered in Safeguarding training which all staff receive.

Staff will be made aware that safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours linked to drug taking, alcohol abuse, truanting, gender based violence and sexting also put children in danger.

## BOARDING SCHOOL ISSUES

As a boarding school there are additional factors to consider with regards to safeguarding set out in the National Minimum Standards. For example, the School should be alert to inappropriate pupil relationships, initiation type behaviours and the potential for peer on peer abuse, particularly if there is a significant gender imbalance. The school does not tolerate "banter" which is often used as a cover for verbal bullying.

## CHILD SEXUAL EXPLOITATION

The School recognises that children who are victims of child sexual exploitation may go missing from education. School staff will be alert to possible indicators of child sexual exploitation and any concerns will be managed in accordance with this policy.

## CHILDREN MISSING FROM EDUCATION

A child going missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect including that a child may be at risk of radicalisation, FGM or forced marriage. Unauthorised absences from school will be managed in accordance with the School's Missing Child Policy.

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carers. A pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more will be reported to the local authority. For further details on when the School has a duty to report to the local authority, please see the Missing Child Policy and Procedures when a Child is not Collected on Time.

## CHILD CRIMINAL EXPLOITATION: COUNTY LINES

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of 79 transporting drugs and a referral to the National Referral Mechanism<sup>98</sup> should be considered.

## DOMESTIC ABUSE

The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

#### FEMALE GENITAL MUTILATION (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

#### 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.

#### SO-CALLED 'HONOUR BASED' VIOLENCE ('HBV')

So-called HBV can include forced marriage and Female Genital Mutilation ('FGM'). School staff will be alert to possible indicators of HBV. Guidance on the warning signs of HBV can be found on pages 38-41 of the Multi-agency statutory guidance of FGM (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage (<https://www.gov.uk/guidance/forced-marriage>).

From October 2015, all teachers (along with social workers and healthcare professionals) have a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols [insert link to local safeguarding procedures here]. Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation: procedural information (<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>)

The local police non-emergency number is 101 and the designated liaison officer is Michael Dix (5504)

#### PEER ON PEER ABUSE

We recognise that children are capable of abusing their peers. In a situation where child abuse is alleged to have been carried out by another child, OSCB child protection procedures should be adhered to for both the victim and the alleged abuser; this means it should be considered as a child care and protection issue for both children.

Peer on peer abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse this could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

The School's approach to sexting and how this is approached by the School is stated in our Social Networking policy. [Link to Social Networking Policy](#)

The School also recognises the different gender issues that can be prevalent in peer on peer abuse, for example, girls being sexually touched or boys being subjected to initiation/hazing type violence. All peer on peer abuse will be managed in accordance with this policy and a bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm will warrant a response under these procedures rather than the School's 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 OSCB 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 OSCB, 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 or police as appropriate.

Victims and perpetrators of peer on peer abuse will be offered support by the School, as appropriate - e.g. counselling, peer support, weekly meetings with Deputy Head pastoral, other external agencies/professionals.

**The school's anti-bullying policy can be found [here](#).**

#### PREVENTING RADICALISATION

We recognise that it is a key role of the School to support children and that School may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination. The school will ensure that through the curriculum and other forums it supports pupils to build resilience to the risk of radicalisation.

Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation and may need help or protection. However, staff acknowledge that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

The Home Office statutory Prevent duty guidance can be accessed on:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_\\_England\\_Wales\\_V2-Interactive.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance__England_Wales_V2-Interactive.pdf)

The Department for Education non-statutory Prevent duty guidance can be accessed on:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Channel General Awareness course can be accessed on the link below:

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

The School, in recognition that pupils may be at risk of being drawn into terrorism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and Deputy DSLs and governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

The School requires every member of staff to complete Prevent Duty training on-line. The school uses Smoothwall filters and alerts are sent daily to the DSL who follows up any suspicious on-line activity.

#### VISITING SPEAKERS

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that 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. On attending the School, Visiting Speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

#### PUPILS WITH SEND

KCSIE (Sept. 2018) puts increasing emphasis on meeting the needs of pupils with special educational needs and disabilities (SEND). Often pupils' SEND needs are seen first and the potential for abuse second. It is recognised that children with SEND have a higher risk of being left out and isolated by their peers. They are also disproportionately affected by bullying. Shiplake will ensure that pupils with SEND have easy access to mentoring and support. Those with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. 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.

#### ONLINE SAFETY

The School will ensure that:

- appropriate filters and monitoring systems are in place to keep children safe online. The School's system is Smoothwall. This systems aims 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;
- children are taught about safeguarding, including online; and
- staff are equipped with the knowledge to safeguard children online by attending online safety training.

The School's social networking and anti-cyber bullying policies also set out the School's approach to online safety, including:

- Acceptable use of social media and IT, including clear guidance on staff/pupil communications
- Definitions of cyber bullying |(including sexting)

New KCSIE (Sept 2018) guidance also places an emphasis on the school's responsibility to monitor pupil use of social media, especially using data on their phones on the 3G and 4G networks. Shiplake addresses this by prohibiting the use of phones during the working day. There is also an on-going programme of education providing advice on the use of social media. The school monitors use of the internet daily through its Smoothwall firewall. This is checked regularly by the DHP.

The Staff Code of Conduct sets out clear guidance on the use of all technology by staff and guidance is given during new staff induction.. [Link to Staff Code of Conduct](#)

#### SEXTING

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

They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages. Sexting may also be called "trading nudes", "dirties" or "pic for pic".

[LINK to NSPCC advice...](#)

#### OTHER SPECIFIC SAFEGUARDING ISSUES

Paragraph 43. of KCSIE (Sept. 2018) refers to a number of other issues. Staff have read this, all of the issues are covered in safeguarding training and regular Safeguarding bulletins produced by the DSL. They are:

- bullying including cyberbullying
- child missing from home or care
- drugs
- fabricated or induced illness
- faith abuse
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health

- modern slavery
- private fostering
- relationship abuse
- sexting