

CHILD PROTECTION AND SAFEGUARDING POLICY

This is a combined policy that applies to King's School, Bruton, Hazlegrove Preparatory School and Sunny Hill Nursery.

SEPTEMBER 2022

Contents

1.	Policy Statement	2
2.	Best Interest of the Child	2
3.	Designated Safeguarding Lead	4
4.	Duty Of Staff, Governors and Volunteers	5
5.	Staff Obligations	10
6.	Procedures	10
7.	Secure School Premises	13
8.	Confidentiality & Information Sharing	14
9.	Monitoring & Review	14
10.	Contacts	15
	Appendix 1 - The Designated Safeguarding Lead	17
	Appendix 2 - Types and Signs of Abuse	20
	Appendix 3 - Dealing with Allegations	29
	Appendix 4 - Early Years Electronic Copy	33
	Appendix 5 - Somerset Referral Chart	34

1 **POLICY STATEMENT**

- 1.1 The School's Child Protection and Safeguarding Policy and Procedures (Policy) has regard to statutory guidance KCSiE 2022, Prevent 2021, *Working Together to Safeguard Children 2020,* RSHE 2020, The Human Rights Act 1998, the Equality Act 2010, and the Public Sector Equality Duty.
 - 1.1.1 has been authorised by the Governing Body of School who ensure they facilitate a whole school approach to safeguarding.
 - 1.1.2 is published on the School website and available in hard copy to parents on request;
 - 1.1.3 can be made available in large print or another accessible format if required; and
 - 1.1.4 its procedures apply wherever staff, Governors or volunteers are working with pupils even where this is away from the School, for example an educational visit.
 - 1.1.5 takes into account Prevent and Channel obligations.
 - 1.1.6 takes into account the need to work closely with the Somerset Safeguarding Children Partnership and other local agencies involved in the protection of children at risk and the support of children in need.
 - 1.1.7 Miss Hannah Strugnell is the nominated person responsible at Hazlegrove for safeguarding children within the EYFS and will liaise with the local statutory children's agencies as appropriate. This policy also applies to the Early Years Foundation Stage children, as well as all other children at Hazlegrove.
 - 1.1.8 Mrs Laura Field is the nominated person responsible at Sunny Hill Nursery for safeguarding children within the EYFS and will liaise with the local statutory children's agencies as appropriate.
 - 1.1.9 The Child Protection and Safeguarding Policy will be annually reviewed by the Governors and this review will be minuted.
 - 1.1.10 Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

2 THE SCHOOL WILL CONSIDER AT ALL TIMES WHAT IS IN THE BEST INTEREST OF THE CHILD.

Every pupil should feel safe and protected from any form of abuse. The School takes a zero-tolerance approach to abuse and no victim will be made to feel ashamed when disclosing abuse. The School is committed to safeguarding and promoting the

welfare of children and young people and expects all staff and volunteers to share this commitment. All staff and volunteers must understand that the School is a full boarding/day co-educational school and therefore, there may be increased safeguarding risks between children and adults and between pupils as the community lives and works together in close proximity. The School encourages a culture of professional curiosity among all staff, focusing on listening to children and taking account of their wishes and feelings, in any measures the School may put in place to protect them and to meet the requirements and procedures of the Somerset Safeguarding Children Partnership.

2.1 The School will take all reasonable measures to:

- 2.1.1 ensure that we practise safer recruitment in checking the suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in KCSiE; the Education (Independent School Standards) (England) Regulations 2014 (as amended); the National Minimum Standards for Boarding Schools . See also the School's separate Recruitment, Selection and Disclosure Policy.
- 2.1.2 ensure that where staff from another organisation are working with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff;
- 2.1.3 follow the local inter-agency procedures of the Somerset Safeguarding Children Partnership and participate in inter-agency working including the use of Somerset Early Help Assessment (EHA) and the 'team around the child' approaches (TAC).
- 2.1.4 be alert to signs of abuse both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
- 2.1.5 be alert to signs of children in need who may need safeguarding support.
- 2.1.6 be alert to children possibly suffering from mental health problems, and proactive in supporting the mental health and wellbeing of pupils.
- 2.1.7 be alert to the signs of children at risk of radicalisation and other forms of risk associated with extremism.
- 2.1.8 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his / her agreed child protection plan;
- 2.1.9 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- 2.1.10 be alert to the medical needs of children with medical conditions:
- 2.1.11 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

- 2.1.12 teach pupils about safeguarding, through the curriculum and PSHEE, including e-safety, radicalisation, cyber-bullying, Relationships Education (up to Year 6 (Hazlegrove) and Relationships and Sex Education (Years 7 and 8 Hazlegrove) (King's). Attention will be paid in the curriculum and PSHEE in reducing risks and building resilience with particular attention to the safe use of electronic equipment of the Internet. The School will focus on providing a preventative education by delivering an effective safeguarding curriculum, tailored to the specific needs and vulnerabilities of individual pupils, including pupils who are victims of abuse, and pupils with special educational needs or disabilities.
- 2.1.13 take all practicable steps to ensure that School premises are as secure as circumstances permit;
- 2.1.14 Where children are being asked to learn online at home the school will regularly provide advice to support children to do so safely. This includes planning for and responding to harmful online challenges and online hoaxes, in accordance with DFE Guidance Harmful online challenges and online hoaxes. Communications to parents and carers reinforce the importance of their children being safe online, to understand what systems the School uses to filter and monitor online use, and to be aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the School who their child is going to be interacting with online.
- 2.1.15 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in the local area; and
- 2.1.16 have regard to guidance issued by the Secretary of State for Education (DfE) in accordance with section 157 of the Education Act 2002 and associated regulations.
- 2.2 KCSiE defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- **2.3** KCSiE provides that the inspection of independent schools will ensure that the Independent School Standard which concerns the welfare, health and safety of children is met.
- 2.4 KCSiE emphasizes that all staff must be aware that safeguarding issues can happen at any school: IT COULD HAPPEN HERE.
- 3 THE FOUNDATION DESIGNATED SAFEGUARDING LEAD (FDSL)
- 3.1 The School's Governing Body has appointed a member of staff of the School's Senior Leadership Team with the necessary status and authority (**Foundation Designated**

Safeguarding Lead) to be responsible for matters relating to child protection and welfare and online safety.

- 3.2 The Foundation Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable him/her to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.
- 3.3 Parents are welcome to approach the Foundation Designated Safeguarding Lead if they have any concerns about the welfare of any child in the School. If preferred, parents may discuss concerns in private with the child's Tutor/Housemaster/Housemistress or the Headmaster or the Nursery Manager at Sunny Hill Nursery who will notify the Foundation Designated Safeguarding Lead in accordance with these procedures.
- 3.4 The name and contact details together with the main responsibilities of the Foundation Designated Safeguarding Lead are set out in Appendix 1.
- 3.5 If the Foundation Designated Safeguarding Lead is unavailable his / her duties will be carried out by the Deputy Designated Safeguarding Lead. The Deputy Designated Safeguarding Lead's details are also set out in Appendix 1. In this policy, reference to the Foundation Designated Safeguarding Lead includes the Deputy Designated Safeguarding Lead where the Foundation Designated Safeguarding Lead is unavailable.

4 DUTY OF STAFF, GOVERNORS AND VOLUNTEERS

4.1 The Governors have a duty to manage cases of allegations, in accordance with this Policy, that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has: • behaved in a way that has harmed a child, or may have harmed a child; • possibly committed a criminal offence against or related to a child; • behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or • behaved or may have behaved in a way that indicates they may not be suitable to work with children.

All staff, Governors and volunteers of the School have a duty to report concerns in accordance with this Policy together with a wider duty of care:

- 4.1.1 to protect children from abuse;
- 4.1.2 to support children in need;
- 4.1.3 to be aware of the terms and procedures in this Policy and to follow them;
- 4.1.4 to know how to access and implement the procedures in this Policy, independently if necessary;

- 4.1.5 to keep a sufficient record of any significant complaint, conversation or event in accordance with this Policy; and
- 4.1.6 to report any matters of concern to the Foundation Designated Safeguarding Lead.
- 4.2 Anyone can make a referral to children's social care where they judge this necessary.
- 4.3 All applicants for recruited posts in the school will undergo a safer recruitment interview carried out by an appropriately trained member of staff.
- 4.4 The Governing Body ensures that the School's safeguarding arrangements take into account the procedures and practice of the Somerset Safeguarding Children Partnership, ensuring there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children. The Governing Body also ensures that they are doing all that they reasonably can to limit children's exposure to online risks from the School's IT system, and that the School has appropriate filters and monitoring systems in place and their effectiveness are regularly reviewed.
- 4.5 The Governing Body has nominated one of its members to manage child protection incidents on behalf of the Partnership and to liaise with external agencies where this is required. The Senior Warden (Chair of Governors) is Mr Stephen Edlmann and the nominated Governor is Miss Jean Walker. The Governor responsible for E-Safety is Mrs Lorne Hodges.
- 4.6 A designated teacher will be appointed by the Governors to promote the educational achievement of children who are looked after (these designated teachers are Mrs Alison Grant at King's and Mrs Deborah Mahony at Hazlegrove). The Governors will ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe. In particular they will ensure that the information they need in relation to the child's looked after status, his / her care arrangements and the levels of authority delegated to the carer by the authority looking after him / her is made available to them.

4.7 Low level concerns that do not meet the harm threshold to contact the LADO

Low level concerns (including allegations) which do not meet the harm threshold may arise in several ways and from several sources. It is critical that all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. If implemented correctly, this should encourage an open and transparent culture; identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of King's.

It is important to share low-level concerns i.e. to create and embed a culture of openness, trust and transparency in King's values and expected behaviour as set out in the Staff Code of conduct are constantly lived, monitored and reinforced by all staff.

4.8 What is a low level concern?

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working at King's has acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work:
- $\bullet \hspace{0.4cm}$ does not meet the allegations threshold or is otherwise not considered serious enough to

consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
 - using inappropriate sexualised, intimidating or offensive language.

The purposes of the low-level concerns procedures are to:

• ensure that staff are clear about what appropriate behaviour is, and are confident in

distinguishing expected and appropriate behaviour from concerning, problematic or

inappropriate behaviour, in themselves and others;

- empower staff to share any low-level safeguarding concerns appropriately;
- address unprofessional behaviour and supporting the individual to correct it at an early

stage;

• provide a responsive, sensitive and proportionate handling of such concerns when they

are raised:

help identify any weakness in the school or colleges safeguarding system.

4.9 **Sharing low-level concerns**

Low-level concerns about a member of staff or volunteer should be reported to your Line Manager, a DSL and/or a member of SMT. The Bursar should be informed of a low level concern relating to supply staff and contractors and he will notify their employers, so any potential patterns of inappropriate behaviour can be identified. The Headmaster will be informed of all low-level concerns in a timely manner according to the nature of each particular low-level concern. The Headmaster will be the ultimate decision-maker in respect to low-level concerns but will consult with the DSL as appropriate. If there is any doubt as to whether information which has been shared about a member of staff as a low-level concern meets the harm threshold, the LADO will be consulted

Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others,

and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Staff should be aware of the following common reasons why people do not report concerns about other trusted adults:

- Can't believe it happened.
- They like the person.
- They are intimidated by the person.
- Don't know who to report to.
- Don't want to get themselves into trouble.
- They are too busy.
- They worry that they will not be believed.
- Fear of recrimination.
- Established quirky/maverick behaviour.
- It has always been like that.
- They have been groomed themselves.

4.10 Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be kept in HR Department and will remain confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records will be reviewed by the Headmaster and the Foundation DSL so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Headmaster will decide on a course of action, either through the disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the King's community that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Information regarding low-level concerns will be kept on HR files until the staff members leaves employment at the school.

4.11 References

Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to

safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

4.12 Responding to low-level concerns

If the concern has been raised via a third party, the Headmaster will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
 - to the individual involved and any witnesses.

The information collected will help categorise the type of behaviour and determine what further action may need to be taken. All this needs to be recorded along with the rationale for their decisions and action taken.

4.13 Boarding school issues

As a boarding school there are additional factors that we will consider with regard to safeguarding set out in the National Minimum Standards. For example, the school will be alert to inappropriate pupil relationships, initiation-type behaviours, and the potential for child on child abuse, particularly if there is a significant gender and age imbalance. The School will also take appropriate steps to ensure that guardian arrangements promote the welfare, physical wellbeing and emotional wellbeing of boarders.

4.14 Safer employer practices

The school 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 see the school's Recruitment Policy, procedures on induction of new staff, Governors, and volunteers on Child Protection and the Staff Code of Conduct.

In line with Part 3 of the DfE's Guidance (KCSiE) the governing body prevents people who pose a risk of harm from working with pupils by adhering to the 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 of consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.

As part of carrying out safer recruitment procedures under KCSiE, members of the teaching and non-teaching staff, including part-time, temporary, supply, 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 on-line update check through the Disclosure and Barring Service (DBS).

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 teaching 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 contracting 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.

4.15 Training

4.15.1 Induction

- (a) All Governors, staff, including temporary staff and volunteers, will be provided with induction training that includes:
 - (i) this Policy;
 - (ii) the Staff Code of Conduct;
 - (iii) the identity, contact details and function of the Foundation Designated Safeguarding Lead and his / her Deputy and the Safeguarding Governor;
 - (iv) child protection training in accordance with Somerset Safeguarding Children Partnership procedures;
 - (v) a copy of Part 1, and Annex A of KCSiE (selected staff only); and
 - (vi) The Whistleblowing Policy.
 - (vii) Pupil behaviour policies.

4.15.2 Child protection training

(a) All staff including the Headmaster will receive a copy of this Policy, the Staff Code of Conduct and Part 1, and Annex A of KCSiE (selected staff only), and will be required to confirm that they have read these and understood them.

- (b) The Headmaster, all staff members, including volunteers who work with children on a regular basis and Governors will undertake appropriate child protection training, including Prevent training which will be updated every 3 years and following consultation with the Somerset Safeguarding Children Partnership. This training equips Governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding.
- (c) The FDSL will provide informal updates for staff by email and/or by staff meetings as required but at least annually.
- (d) On-line safety training for staff is integrated into the whole school safeguarding approach.

4.15.3 Foundation and Deputy Designated Safeguarding Leads

- (e) The Foundation Designated Safeguarding Lead and Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working and will attend refresher training at two-yearly intervals. For further details about the training of the Foundation Designated Safeguarding Lead, see Appendix 1.
- 4.15.4 All induction and training will be carried out in line with advice from the local three safeguarding partners.

5 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.

The Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 and to those who are directly concerned in the management of that childcare.

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 school immediately. This will include notification of any convictions, cautions, Court orders, reprimands or warnings he/she may receive. He/she must also notify the school immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

Staff who are disqualified from childcare or registration, 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 Head or Bursar for more details.

6 PROCEDURES

6.1 Complaints of abuse

- 6.1.1 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action taken in accordance with this policy.
- 6.1.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware of. Further details are set out in Appendix 2.
- 6.1.3 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. Staff are encouraged to determine how best to build trusted relationships with children and young people which facilitate communication. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff
- 6.1.4 If a member of staff is concerned that a pupil may be suffering harm, the matter should be referred to the Foundation Designated Safeguarding Lead immediately. Anyone can make a referral should they judge this necessary and if at any point there is a risk of immediate serious harm a referral should be made to children's social care immediately.
- 6.1.5 All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

6.2 Action by the Foundation Designated Safeguarding Lead

- 6.2.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the Foundation Designated Safeguarding Lead will take into account:
 - (a) the local inter-agency procedures of the Somerset Safeguarding Children Partnership;
 - (b) the nature and seriousness of the suspicion or complaint. A complaint involving alleged criminal behaviour will ordinarily be reported to children's social care and the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police. For example, where the exchange of youth produced sexual imagery does not involve aggravating factors. All concerns/allegations will be assessed on a case by case basis and considering the wider context.

- (c) the child's wishes or feelings; and
- (d) duties of confidentiality, so far as applicable.
- 6.2.2 If, having consulted Somerset Children's Social Care thresholds for a statutory Children and Families assessment, there is room for doubt as to whether a referral should be made, the Foundation Designated Safeguarding Lead will consult with children's social care via the Consultation line for DSLs & GPs 0300 123 3078 on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to children's social care will be made without delay (and in any event within 24 hours).
- 6.2.3 Where there is reasonable cause to suspect that a child is at risk of suffering significant harm, meeting the Level 4 threshold, the DSL will make a referral to Somerset Direct immediately on 0300 123 2224.
- 6.2.4 In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Foundation Designated Safeguarding Lead will liaise with children's social care and where appropriate an inter-agency assessment will take place, including the use of Somerset's Early Help Assessment (EHA) and Team Around the Child approaches.
- 6.2.5 Anyone can make a referral if necessary.
- 6.2.6 Allegations against pupils (child on child abuse). On being notified of a complaint or suspicion of an incident of child on child abuse, the Foundation Designated Safeguarding Lead will discuss the concerns and allegations with the member(s) of staff who reported them. The school will carry out a robust risk and needs assessment in respect of each child affected by the abuse (including the alleged perpetrators). Where necessary, the Foundation Designated Safeguarding Lead will take immediate steps to ensure the safety of the child/all children affected.
 - 6.2.6.1 A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour, discipline and sanctions will apply.
 - 6.2.6.2 The threshold for dealing with an issue of pupil behaviour or bullying will follow the process as detailed above, subject to local specifics as in any other case when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer significant harm'.
 - 6.2.6.3 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 children's social care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to suspend him / her during the investigation.

- 6.2.6.4 Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed.
- 6.2.6.5. All concerns, discussions and decisions made, and the reasons for those decisions, is recorded by the FDSL in writing. Information is kept confidential and stored securely (separate child protection files for each child). Records will include
 - a clear and comprehensive summary of the concern;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome.

6.3 Dealing with allegations against staff, Governors and volunteers

- 6.3.1 The School has procedures for dealing with allegations against staff, Governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 3 and follow Part 4 of KCSiE.
- 6.3.2 The Local Area Designated Officer (LADO) will be informed immediately and in any event within one working day of all allegations against staff, Governors and volunteers that come to the School's attention and appear to meet the criteria set out in paragraph 1 of Appendix 3. The role of the LADO is to provide advice and preside over an investigation of any allegation or suspicion of abuse directed against anyone working in the school. To notify the LADO of an allegation, an Allegations Reporting Form (ARF) needs to be completed by the Foundation Designated Safeguarding Lead and forwarded to Somerset Direct via email: sdinputters@somerset.gov.uk. Alternatively, the Foundation Designated Safeguarding Lead can phone Somerset Direct on 0300 123 2224 and request an ARF.
- 6.3.3 Detailed guidance is given to staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Code of Conduct and includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.
- 6.3.4 The School has a culture of safety and of raising concerns. Staff will be encouraged to be reflective of current practice and to report poor/unsafe practice or potential failings in the School's safeguarding regimes. The School's Whistleblowing Policy sets out the procedure for reporting wrongdoing by staff in the workplace that may involve the safeguarding and welfare of children. Training and support will be given to staff and any concerns will be received and treated with transparency and accountability. The Whistleblowing Policy will be made available to all staff on appointment and is always available online in Share Point/Head/Policies.

6.4 Missing child procedures

6.4.1 Children who go missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including abuse, neglect, sexual abuse and child sexual and/or criminal exploitation. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. The School's procedures for unauthorised absence and for dealing with children who go missing from education are in the Missing Pupil Procedure. Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

The School will report to Somerset County Council (SCC) 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. All unexplained absences will be followed up in accordance with this Missing Pupil Procedure. The School will follow the DfE guidance as stated in 'Working Together To Support Attendance' (2022)

- 6.4.2 The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).192 This will assist the local authority to fulfil its duty to identify children of compulsory school age who are missing from education;
- 6.4.3 The School will follow up with any pupil who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.
- 6.4.4. School attendance registers are carefully monitored to identify any trends. The School will inform SCC (and the local authority where a pupil is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and SCC.
- 6.4.5 Action will be taken in accordance with this procedure if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policies supports identification of abuse and provides preventative measures against the risk of the child going missing in the future.

6.5 Children in need

6.5.1 Where a child is perceived to be in need of specific external actions or support, e.g. because of mental health conditions or through missing education, then the child should be referred to children's social care.

6.6 Informing parents

- 6.6.1 KCSiE says that schools should have at least two emergency contacts for every pupil and the School will endeavour to maintain two contact numbers for every pupil on roll.
- 6.6.2 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Foundation Designated Safeguarding Lead will need to consult the Headmaster, the LADO, children's social care and / or the police before discussing details with parents.
- 6.6.3 See also section 6 of Appendix 3 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Headmaster of the School.

7 SECURE SCHOOL PREMISES

- 7.1 The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.
- 7.2 The School keeps a visitor's book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises with Contractors being provided with the Safeguarding leaflet on arrival at Reception. Visitors, such as visiting speakers, who may have direct access to children, will be required to show proof of identity.
- 7.3 All visitors to the boarding houses must report to the duty member of staff immediately on arrival and must observe the necessity to be kept under sufficient staff supervision during their visit.

8 CONFIDENTIALITY AND INFORMATION SHARING

8.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The Schools has clear powers to share, hold and use information for these purposes.

The Governing body ensures relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

The School, in accordance with Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018, and Data protection: toolkit for school, Guidance to support schools with data

protection activity, including compliance with the General Data Protection Regulation (GDPR), April 2018 will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working together to safeguard children (July 2020).

- 8.2 Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.
- 8.3 The School is GDPR compliant and staff should see the GDPR / Data Protection Policy for more information.

9 MONITORING AND REVIEW

- 9.1 The Foundation Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary. Any child protection incidents at the School will be followed by a review of these procedures by the Foundation Designated Safeguarding Lead and a report made to the Governing Body. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.
- 9.2 The FDSL will provide the governors with an annual report reviewing safeguarding policies, procedures and the effectiveness of their implementation. Detailed minutes recording the review by the Governing Body will be made.

10 CONTACTS

- 10.1 The contact details for the Senior Warden are: c/o The Bursar, King's School, Bruton, Somerset, BA10 0ED.
- 10.2 The contact details for the nominated safeguarding governor, Miss Jean Walker, are: c/o The Bursar, King's School, Bruton, Somerset, BA10 0ED or at safeguardinggovernor@kingsbruton.com.

The contact details for the School's Foundation Designated Safeguarding Lead and his deputies are given in Appendix 1.

10.3 LADO enquiries

Somerset Direct 0300 123 2224

10.4 The telephone numbers of the Somerset children's social care department are as follows:

Somerset Direct: 0300 123 2224, Email: childrens@somerset.gov.uk

10.5 Children's Safeguarding Leads Consultation Line

DSLs have access to a consultation line (0300 123 3078) for complex and acute safeguarding concerns. It is expected that DSLs refer to Effective Support for Children and Families Thresholds (Somerset LSCV) prior to calling Somerset Direct, as well as check to see if any other agencies are aware/working with the child. The family/child discussed remains anonymous.

10.6 The following are contact details for support and advice (not referrals) about children vulnerable to radicalisation:

SCC Prevent Team prevent@somerset.gov.uk

- 10.7 Referrals should be made by completing an Early Help Assessment http://professionalchoices.org.uk/eha/ (Section 8 Choose Prevent) and forwarded to the EHA Hub to register EHAcoordinator@somerset.gov.uk and the assessment forwarded to the Police Prevent Team channelsw@avonandsomerset.pnn.police.uk
- 10.8 Referrals concerning pupils over 18 years of age should be made directly to
 - 10.1.1 Police Prevent Team
 - 10.1.2 Phone 01278 647466 Monday to Friday, 8am to 4pm. For out of hours advice, phone 101

Email channelsw@avonandsomerset.pnn.police.uk

10.9 Call 999 if there is immediate risk (high risk) e.g. intent to harm or travel abroad in the next 24 hours.

See appendix 5 Somerset Prevent Duty Referral Chart

10.10 The DfE dedicated telephone helpline and mailbox for non-emergency advice on extremism for staff and Governors:

020 73407264 counter-extremism@education.gsi.gov.uk

- 10.11 Any concerns regarding FGM will be reported to the local Police (101)
- 10.12 The following contact details may be useful for pupils:

Somerset Contact Centre 07879 622144

Childline 0800 1111

NSPCC 0800 028 0285/help@nspcc.org.uk

Children's Commissioner 0800 528 0731

Effective date of the policy	September 2022
Date	September 2022
Authorised by	The Senior Warden
	celineallder@protonmail.com
	Celine Allder
	info@bridgetwoodward.co.uk
	Bridget Woodward
	Hazlegrove
	 Mr Johnston-Price – mjp@kingsbruton.com
	 Mrs Johnston-Price - pxp@kingsbruton.com
	 Mrs Crang – syc@kingsbruton.com
School Counsellors	King's:
	Mrs Susan Fone (HzG) - 01963 548967
Independent Listener	Mrs Brooks (King's) - bjb@kingsbruton.com

2023

Reviewed annually – next review September

Appendix 1 THE FOUNDATION DESIGNATED SAFEGUARDING LEAD

Hazlegrove	King's	Sunny Hill Nursery
The Foundation Designated Safeguarding Lead is Mr Rob Lowry who may be contacted on 01749 814250.	The Foundation Designated Safeguarding Lead is Mr Rob Lowry, member of Senior Leadership Team, who may be contacted on 01749 814250.	The Foundation Designated Safeguarding Lead is Mr Rob Lowry, member of Senior Leadership Team, who may be contacted on 01749 814250.
The Deputy Designated Safeguarding Lead (eSafety and Prevent) is Mr David Edwards, Director of Studies, who may be contacted on 01963 440314.	The 1st Deputy Designated Safeguarding Lead (Raising Awareness and Child Exploitation Champion) is Mrs Emily Simper who may be contacted on 01749 814235.	The 1st Deputy Designated Safeguarding Lead is Mrs Laura Field Nursery Manager who may be contacted on 01749 814428.
The Deputy Designated Safeguarding Lead (EYFS) is Miss Hannah Strugnell, Head of Pre-Prep, who may be contacted on 01963 442609.	The Deputy Designated Safeguarding Lead (Wellbeing and Mental Health) is Mrs Alison Grant, Deputy Head, who may be contacted on 01749 814319.	The 2nd Deputy Designated Safeguarding Lead is Mrs Heather Finlay who may be contacted on 01749 814431.
The Deputy Designated Safeguarding Lead (Pastoral) Mr Regan Schreiber, Head of Boarding, who may be contacted on 01963 440314.	The Deputy Designated Safeguarding Lead (eSafety and Prevent) is Mr Malcolm Jeffrey who may be contacted on 01749 814209.	
The Deputy Designated Safeguarding Lead (Raising Awareness and Child Exploitation Champion) is Mr Alistair Forbes, Boarding Co-ordinator, who may be contacted on 01963 442628.		

The School's nominated Safeguarding Governor is Miss Jean Walker who may be contacted by email: safeguardinggovernor@kin gsbruton.com The School's nominated Safeguarding Governor is Miss Jean Walker who may be contacted by email: safeguardinggovernor@kin gsbruton.com The School's nominated Safeguarding Governor is Miss Jean Walker who may be contacted by email: safeguardinggovernor@kingsbruton.com

In accordance with Annex B of KCSiE, the main responsibilities of the Foundation Designated Safeguarding Lead are:

1.1 Managing referrals

- (a) To take lead responsibility for referring all cases of suspected abuse of any pupil at the School to children's social care. The DSL will report safeguarding concerns to the Headmaster (provided they do not concern the Head). The DSL has ultimate responsibility for safeguarding and child protection in the school and this responsibility should not be delegated.
- (b) The Foundation Designated Safeguarding Lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NSPCC- When to call the police should help Foundation Designated Safeguarding Leads understand when they should consider calling the police and what to expect when they do.
- (c) To take lead responsibility for referring to the Local Authority Designated Officer (LADO) all child protection concerns which involve a member of staff.
- (d) To take lead responsibility for making referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child.
- (e) To take lead responsibility for making referrals to the police where a crime may have been committed which involves a child.
- (f) To take lead responsibility to respond to reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the School, in accordance with guidance provided in Keeping Children Safe in Education.
- (g) Liaising with the Headmaster in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the School.

(h) To act 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.

1.2 Raising awareness

- (a) Ensure this Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- (b) Ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.
- (c) Ensure this Policy is available publicly.
- (d) Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the School's role in this.
- (e) Maintain links with the Somerset Safeguarding Children Partnership to ensure staff are aware of training opportunities and the local policies on safeguarding.
- (f) Where children leave the School ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file. The DfE recommends a receipt.
- The Deputy Designated Safeguarding Lead will carry out this role where the Foundation Designated Safeguarding Lead is unavailable.
- The Foundation Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals in order to:
 - 3.1 understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
 - 3.2 have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
 - 3.3 ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
 - 3.4 be alert to the specific needs of children in need, those with special educational needs, disabilities and young carers;
 - 3.5 be able to keep detailed, accurate, secure written records of concerns and referrals;

- 3.6 obtain access to resources and attend any relevant or refresher training courses;
- 3.7 encourage 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 and to meet the requirements and procedures of the Somerset Safeguarding Children Partnership.

Appendix 2 TYPES AND SIGNS OF ABUSE

1 Types of abuse

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

- The NSPCC website www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/ also provides helpful information on types of abuse and what to look out for, which staff are encouraged to refer to.
 - 2.1 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Part one of KCSiE defines the following types of abuse:
 - 2.2 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
 - 2.3 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
 - 2.4 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse incidents

affecting members of the school community that take place outside school will be treated in the same way as sexual abuse incidents taking place inside school.

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

Extra-familial safeguarding county lines, cross borders, cuckooing. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the Foundation Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Staff must be aware of contextual safeguarding when reporting concerns and must ensure all information and background detail will be given to the DSL when discussing concerns.

County lines, cross borders and cuckooing are police terms for urban gangs supplying drugs to market towns using dedicated mobile or 'deal lines'. Gangs use children and vulnerable people to move drugs and money to take over the home of vulnerable adults by force or coercion in a practice known as cuckooing.

Child on child abuse: the school recognises that children are capable of abusing their peers. The school will adopt a zero tolerance approach to peer-on-peer abuse and it will never be passed off as 'banter', 'having a laugh', 'part of growing up' or 'boys will be boys' as this can lead to a culture of unacceptable behaviour and an unsafe environment for pupils. No victim will ever be made to feel ashamed of disclosing abuse. When considering whether behaviour is abusive, the school will consider if there is a large difference in power (e.g. age, size, ability, development) between the pupils concerned; or whether the perpetrator has continually tried to harm one or more pupil or whether there are concerns about the intention of the alleged perpetrator.

Child on child abuse can manifest itself in many ways, and different gender issues can be presented. Severe harm may be caused to pupils by abusive and bullying behaviour of other pupils which may be physical, sexual, or emotional and can include gender-based violence, sexual assault, sexting, teenage relationship abuse, child on child exploitation, serious use of violence, sexual bullying or harmful sexual behaviour, upskirting (which typically involves taking a picture under a person's clothing without them knowing, to obtain sexual gratification or cause the victim humiliation, distress or alarm), initiation/hazing type violence and rituals. Staff must report any peer-on-peer abuse concerns to one of the DSLs and/or report via MyConcern.

King's recommends 'The Sexual Behaviours Traffic Light Tool' by the Brook Advisory to assess and respond appropriately to sexualised behaviour. The Traffic Light Tool can be found at https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool.

Staff should be aware of the Relationship Policy. Pupils receive Relationships and Sex Education (RSE) in line with statutory DfE guidance, Sexual violence and sexual harassment between children in school and colleges (September 2021). The school's approach to sexting is covered in e-safety training, the ICT Acceptable Use Policy, the Confiscation Policy and the Anti-Bullying

Policy. Sexting is sending, receiving, or forwarding sexually explicit messages, photographs or images primarily between mobile phones but it may also include computers and any digital device. Abuse can take place wholly online or technology may be used to facilitate offline abuse. UKCIS guidance is followed in responding to incidents involving the sharing of nude and semi-nude images

The school also recognises the different gender issues that can be prevalent in child-on-child abuse. All child-on-child abuse will be managed in accordance with the above policies 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. Abuse is abuse and will never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up.'

It is essential that all victims are reassured that they are being taken seriously,

regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

A pupil against whom an allegation has been made may be suspended from school during the investigation. The school will take advice from the Somerset Safeguarding Children Partnership and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the Somerset Safeguarding Children Partnership, parents are informed as soon as possible and the pupils involved will be supported during the interview by an appropriate adult until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from Somerset Safeguarding Children Partnership or police as appropriate. Victims and perpetrators of child-on-child abuse will be offered support from the school (e.g. School Counsellor).

Child Sexual Exploitation and Child Criminal Exploitation

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The experiences of girls being criminally exploited can be very different to boys. Indicators of CCE may also be different for girls. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Children missing from education: a child going missing from school is a potential indicator of abuse or neglect. Staff should follow the school's procedure for children who go missing from education particularly on repeat occasions to help identify the risk of abuse and neglect, including sexual exploitation and to help prevent the risks of their going missing in future. All pupils must be on the Admissions Register and Attendance Registers. The School will inform the LADO of any pupil who fails to attend school regularly or has been absent without a school permission for a period of 10 school days or more.

"Honour Based" Abuse (HBA) including Female Genital Mutilation (FGM) and Forced Marriage HBA encompasses crimes which have been committed to protect or defend the honour of the family and/or the community including FGM and forced marriage. All forms of so-called

HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the DSL.

FGM comprises all procedures of partial or total removal of the female genitalia or other injury to other female genital organs. It is illegal in the UK and a form of child abuse with long lasting, harmful consequences. There is a range of potential indicators that a girl may be at risk of FGM and if staff are concerned they should immediately contact the Foundation Designated Safeguarding Lead. Where a member of staff discovers that an act of FGM appears to have been carried out on a girl aged under 18 there will be a statutory duty for that member of staff to report it to the police.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the Foundation Designated Safeguarding Lead or a deputy.

Preventing radicalisation: protecting children from the risk of radicalisation should be seen as part of the School's wider safeguarding duties. The school, in recognition that pupils may be at risk of being drawn into terrorism, carries out appropriate risk assessments of the potential risk in the local area. Such risk assessments are discussed with the Headmaster, DSL, DDSLs and Governor responsible for safeguarding to ensure that the school's safeguarding procedures are sufficiently robust in order to help prevent and protect children from being drawn into terrorism and are regularly revised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism (e.g. vocal or active opposition to fundamental British values). Terrorism is an action that endangers or causes serious violence to a

person/people; causes serious damage to property; or seriously interferes or

disrupts an electronic system. The use or threat must be designed to influence the

government or to intimidate the public and is made for the purpose of advancing a

political, religious or ideological cause.

The Foundation Designated Safeguarding Lead will undertake Prevent awareness training and provide advice and support to other members of staff in protecting children from the risk of radicalisation. The Headmaster, Deputy Heads and Housemasters/Housemistresses will complete the Channel General Awareness module. The School will ensure, through ongoing checks by the Deputy Head that any visiting speakers are suitable and appropriately supervised. The School will ensure that children are safe from terrorist and extremist material when accessing the internet at school by ensuring that suitable filtering is in place. The School will also teach pupils about online safety in general. The normal referral processes are available when there are concerns about children who may be at risk of being drawn into terrorism. The School will consider the level of risk to identify the most appropriate referral, which could include Channel or Children's Social Care.

Domestic Violence and Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and is a serious abuse of human rights. The pressure put on people to marry against their will can be physical, emotion / psychological and or financial.

Gang and Youth Violence

The likelihood of pupils at King's being affected by serious violence or gangs is minimal, however where these problems do occur there will almost certainly be a significant impact. King's has a duty and responsibility to protect pupils and ensure that there is no youth violence in school. If staff are concerned about youth violence and gang involvement they should inform the Headmaster and DSL immediately. The School will follow the Home Office Guidelines outlined in Preventing youth violence and gang involvement – practical advice for schools and colleges.

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 and may include a DBS check if relevant.

Visiting speakers will be expected to understand that where appropriate their sessions 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 of 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 and current identification document including a photograph such as a passport or photocard driving licence. The school will also keep a formal register of visiting speakers.

Historical Abuse

The School will inform the Police about the any allegations of historical abuse at the earliest opportunity. Historical abuse (also known as – non-recent abuse) is an allegation of negligence, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years of age.

Homestays (UK)

When King's arranges a homestay for an overseas pupil in the UK, we will use our judgement to assess the suitability of the adults in the host family. A DBS enhanced certificate with barred information will be obtained. If there are other people in the family aged over 16, the School will consider if it is necessary to obtain a DBS Enhanced certificate for those aged 16 or over in the household.

Homestays (exchange visits abroad)

The School will liaise with partner schools abroad, to establish a shared understanding of an agreement to the arrangement in place to ensure that there are no safeguarding concerns regarding the suitably of adults in host families. The School will use professional judgement to ensure arrangements are appropriate and sufficient to safeguard every pupil on an exchange. All parents involved in an exchange will be aware of the agreed arrangement.

Special Educational Needs and Disability: All staff need to be alert to the specific needs of those pupils with special educational needs and/or disabilities. Those with SEND may not outwardly show signs of abuse and/or may have difficulties in communicating about abuse and 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 these with the DSL as appropriate.

On-line Safety: The school will ensure that appropriate filters and monitoring systems, including the enforcement of relevant polices by members of staff, are in place to keep children safe on-line. Children are taught about safeguarding including on-line safety and harmful online challenges and online hoaxes, and staff are equipped with the knowledge to safeguard children on-line by attending on-line safety training. The school's E-Safety Policy and Acceptable Use Policy sets out the school's policy on on-line safety.

3 Signs of abuse

- 3.1 Possible signs of abuse include, but are not limited to:
 - 3.1.1 the pupil says he/she has been abused or asks a question or makes a comment which gives rise to that inference
 - 3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries. Staff should be aware of the possibility of self-harm and contact the Foundation Designated Safeguarding Lead if concerned. Staff should also read the Self-harm Policy
 - 3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour
 - 3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
 - 3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing
 - 3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed
 - 3.1.7 the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers and
 - 3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 2.2 Staff (including supply staff and volunteers) should be aware of pupil abuse (including the legal threshold) that may be an increased risk in a boarding school context (e.g. abusive relationships, sexual misconduct,

bullying including cyber-bullying). The Somerset Safeguarding Children Partnership can provide advice on the signs of abuse and the NSPCC website is also a good source of information and advice. Such abuse should be referred to an external agency.

3 Guidance for staff and volunteers on suspecting or hearing a complaint of abuse

Action staff must take

- 3.3 A member of staff or volunteer suspecting or hearing a complaint of abuse:
 - 3.3.1 must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;
 - 3.3.2 must not ask leading questions, i.e. a question which suggests its own answer;
 - 3.3.3 must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Foundation Designated Safeguarding Lead who will ensure that the correct action is taken; and
 - 3.3.4 must keep a sufficient written record of the conversation. The record should include:
 - (a) the date and time;
 - (b) the place of the conversation; and
 - (c) the essence of what was said and done by whom and in whose presence.
- 3.4 The record should be signed by the person making it and should use names, not initials, as well as forwarded confidentially by staff with access to the MyConcern management information system. The record must be kept securely and handed to the Foundation Designated Safeguarding Lead as soon as possible.
- 3.5 All evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be safeguarded and preserved and passed to the Foundation Designated Safeguarding Lead.
- 3.6 All suspicions or complaints of abuse must be reported to the Foundation Designated Safeguarding Lead as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 3 should be followed. If there is a risk of immediate serious harm to a child and it is not possible to report to the Foundation Designated Safeguarding Lead or Deputy Designated Safeguarding Lead, a referral should be made to children's social care immediately.

- 3.7 The school will not do anything that may jeopardise any external investigation. Once a matter has been referred, further responsibility for gathering information and deciding what happens next, will rest with Social Services and the police.
- 3.8 With regard to the Prevent Duty the school will cooperate with Channel panels and the police.

Appendix 3 DEALING WITH ALLEGATIONS AGAINST MEMBERS OF STAFF (INCLUDING SUPPLY STAFF), THE HEADMASTER, GOVERNORS OR VOLUNTEERS

4 The School's procedures

- 4.1 The School's procedures for dealing with allegations made against staff will be used where the member of staff, the Headmaster, Governor or volunteer has:
 - 4.1.1 behaved in a way that has harmed a child, or may have harmed a child;
 - 4.1.2 possibly committed a criminal offence against or related to a child; or
 - 4.1.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children.
 - 4.1.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children
- 4.2 Any allegations not meeting this criteria will be dealt with in accordance with the Somerset Safeguarding Children Partnership procedures. Advice from the LADO will be sought in borderline cases.
- 4.3 All such allegations must be dealt with as a priority without delay.

5 Reporting an allegation against a member of staff (including supply staff), the Headmaster, Governor or volunteer

- 5.1 Where an allegation or complaint is made against any member of staff, (including the Deputy Designated Safeguarding Leads), supply staff, Governor or volunteer, the matter should be reported immediately to the Headmaster, or in his / her absence to the Chair of Governors (known as the Senior Warden). The school will adhere to guidance in KCSiE. Where appropriate, the Headmaster will consult with the Foundation Designated Safeguarding Lead and the allegation will be discussed immediately with the LADO before further action is taken. No investigations will take place until after discussions with and agreement from LADO. The School does not require parental consent prior to reporting any allegation or complaint.
- 5.2 Where an allegation or complaint is made against the Headmaster, the matter should be reported immediately to the Senior Warden, or in his / her absence the Vice-Chair (known as the Junior Warden), without first notifying the Headmaster. Again, the allegation will be discussed immediately with the LADO before further action is taken.
- 5.3 Where an allegation or complaint is made against the Foundation Designated Safeguarding Lead, the matter should be reported immediately to the Headmaster. Where appropriate, the Headmaster will

- consult with the Deputy Foundation Designated Safeguarding Lead and the allegation will be discussed immediately with the LADO before further action is taken.
- 5.4 If it is not possible to report to the Headmaster or Senior Warden in the circumstances set out above, a report should be made immediately to the Foundation Designated Safeguarding Lead or, if he / she is unavailable, the Deputy Designated Safeguarding Lead. The Foundation Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Headmaster or, where appropriate, the Senior Warden.
- 5.5 The person taking action in accordance with the procedures in this Appendix is known as the "case manager".
- 5.6 The police should be informed immediately in cases of serious harm or criminal activity.

6 Disclosure of information

- 6.1 The LADO should be consulted and their advice should be followed as to whether the allegation should be shared with the accused.
- 6.2 The parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process.
- 6.3 Where the LADO advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 6.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

7 Further action to be taken by the School

- 7.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part four of KCSiE and the School's employment procedures.
- 7.2 The School will make arrangements away from children for alternative off-site accommodation if a member of boarding staff is suspended pending an investigation of a child sexual exploitation or child criminal exploitation.

8 Ceasing to use staff

8.1 If the school ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a

settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

- 8.2 If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.
- 8.3 Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency should be made.

9 Unsubstantiated, false or malicious allegations

- 9.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.
- 9.2 Where a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

7. Record keeping

- 7.1 Details of allegations found to be malicious will be removed from personnel records.
- 7.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal retirement age or for a period of ten years from the date of the allegation, if this is longer.
- 7.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references.
- 8. 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. 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. 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: 08000 280285, Email: help@nspcc.org.uk).

9. **Historical allegations**: All allegations of historical abuse should be referred to the Headmaster immediately. Should historical allegations of child abuse be made against a teacher who is no longer teaching at the school, the school will, in accordance with KCSiE, 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.

King's Relevant documents and policies. Staff should be aware of the following documents and policies:

Recruitment Policy Anti-Bullying Policy Staff Code of Conduct Whistleblowing Policy Health & Safety Policy Complaints Policy Complaints Policy Behaviour Policies: Anti-Bullying Policy Behaviour and Discipline Policy Drugs Policy Alcohol and Tobacco Policy Physical Contact between staff and pupils Policy Anti-Bullying Policy First Aid SHN Curriculum CSEN if we don't join Hazlegrove's) Admissions Admissions	Joint Policies	King's Policies	Hazlegrove Policies	Sunny Hill Nursery Policies
Protection Policy Relationship Policy Physical Restraint Policy Relationships, Sex and Health Education Policy Other Policies Mental Health Policy E-safety Policy Missing Child Acceptable Use Policy Policy Missing Child Policy Uncollected child policy Intimate care policy Restricting access to School premises and boarding to people outside of School Sickness SHN Behaviour Policy Missing Child Nutrition, Missing Child Nutrition, Policy Sickness Sickness	Policy Staff Code of Conduct Whistleblowing Policy Health & Safety Policy Complaints Policy GDPR Data	Anti-Bullying Policy Sanctions Policy Pupil Code of Conduct School Rules Alcohol Policy Drugs Policy Smoking Policy Relationship Policy Physical Restraint Policy Relationships, Sex and Health Education Policy Other Policies Mental Health Policy E-safety Policy ICT Acceptable Use Policy Whistleblowing Policy	Policy Behaviour and Discipline Policy Drugs Policy Alcohol and Tobacco Policy Physical Contact between staff and pupils Policy ICT & E-Safety Policy Acceptable Use Policy Educational visits Policy Restricting access to School premises and boarding to people outside of	First Aid SHN Curriculum EYFS policy (SEN if we don't join Hazlegrove's) Admissions SHN Behaviour policy Missing Child Policy / Uncollected child policy Intimate care policy Nutrition, mealtimes and Food Play

Educational Visits Policy	
Visiting Speaker Policy	
Access to School Premises by people outside School Policy	

Appendix 4. EARLY YEARS ELECTRONIC POLICY; THIS POLICY REFERS TO ALL STAFF AND VISITORS.

- 1. Staff should only use photographic equipment, including cameras, iPads and mobile phones, as guided by these criteria.
- 2. Any school device e.g. iPad that is used for assessment purposes and to store photographs and taken off site must be security locked by a password. Passwords must be confidential.
- 3. Staff mobile phones are to be kept out of sight of children and used at times when the member of staff is not responsible for children.
- 4. Photographic equipment will be designated for work-related purposes only. The use of personal photographic equipment is to be avoided. Should it be considered that such use is not to be precluded for a given reason, explicit authorisation must be obtained from the Foundation Designated Safeguarding Lead.
- 5. Images of children and young people must only be taken when they are in suitable dress. In no circumstances, are images to be taken of children or young people in any state of undress. Should children and young people be participating in sport activities, careful consideration must be given to the appropriateness of taking such images, in particular the angle of which shots may be taken. In no circumstances are photos are to be taken in the cloakroom areas. Published photographs of pupils swimming are to show only above the waist.
- 6. The Foundation Designated Safeguarding Lead must reserve the right to view any images taken and/or to withdraw or modify an individual's authorisation to take or make images at any time. Staff must ensure that all images are available for scrutiny and be able to justify any images in their possession.
- 7. On admission to the school all parents complete a parent contract, stating whether their child can or cannot be included in photographs.

8.	Staff must not use their mobiles during working hours and these must be stored securely in staff bags, out of sight. They must not receive or make calls on their mobile phones during lessons.	

Appendix 5 SOMERSET PREVENT DUTY - REFERRAL CHART



Somerset Prevent Duty Referral Chart



For Support and advice (not referrals):

SCC Prevent Team:

prevent@somerset. gov.uk

CHECK

Gather more information consult The Effective Support document (http://sscb.safeguardingsomerset.org.uk/protocols-procedures-and-reviews/threshold-documents/) and identify what further action is required.

SHARE

Child < 18 (up to 25 with Special Educational Needs Disabilities – SEND)

Complete an Early Help Assessment http://professionalchoices.org.uk/eha/

(Section 8 – Choose Prevent) and forward to the EHA Hub to register

EHAcoordinator@somerset.gov.uk

AND

Forward the Assessment to the Police Prevent Team

channelsw@avonandsomerset.pnn.police.uk

Adult (18 +)

Contact Regional Police Prevent Team on 01278 647466 (Monday/Friday – 8:00-16:00 hours. Out of hours advice call 101)

Email 24hours:

channelsw@avonandsomerset.pnn.police.uk

999 - If there an is immediate risk (high risk) e.g. intent to harm or travel abroad in next 24hrs

Consent Guide

- You do not need consent to refer a case to the Police Prevent Team <u>regardless of age</u>
- Nevertheless, it is good practice, in the case of a child / young person / family; it is recommended that consent is gained to ensure early help is engaged as soon as possible, to ensure transparency.

http://www.somerset.gov.uk/information-and-statistics/data-protection/data-protection-act/

Police and SCC Prevent team asses the referral and its suitability for the Channel panel. Contact is made with referrer.

Version 5 Update: April 2020