



The Dean Close Foundation

Independent, Co-educational, Day and Boarding School

**Safeguarding and Child Protection Policy
(W044)**

Ratified by the Trustee Board 17th March 2018

Updated 3rd September 2018

Registered Charity No: 1086829

Introduction

1. **This Policy is in accordance with locally agreed Inter-Agency procedures.**
2. A range of documents, circulars and guidance for good practice govern Safeguarding and Child Protection work at Dean Close Foundation schools. Key documents, which inform this policy include:
 - a. *Keeping Children Safe in Education 2018*
 - b. *Working Together to Safeguard Children 2018*
 - c. *Gloucestershire Safeguarding Children Board documentation*
 - d. *What to do if you're worried a child is being abused guidance (2015)*
 - e. *Boarding Schools National Minimum Standards Inspection Regulations, Standard 3*
 - f. *Every Child Matters agenda*
 - g. *The Children Act 2004*
 - h. *Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings. Mach 2009*
 - i. *Prevent Duty Guidance Section 29 of Counter-Terrorism and Security Act 2015*
 - j. *The Prevent Duty. Department for Education June 2015*
 - k. *Mandatory Reporting of Female Genital Mutilation. Home Office October 2015*
 - l. *Child sexual exploitation DfE February 2017*
3. Each school has its own Designated Safeguarding Lead (DSL) and deputy DSL; these are listed below. In the absence of the DSL, the matter should be referred to the Deputy DSL or the DSL in another Foundation school. The DCS DSL is the safeguarding lead for the whole Foundation.

Contact details:

4. The DSL at Dean Close School is:
Jacqueline Davis (Deputy Head Pastoral)
07786 917 259 or 01242 258019
jadavis@deanclose.org.uk

The Deputy DSL is:
Charlie Montgomery (Director of Tutoring)
01242 258000
chsmontgomery@deanclose.org.uk
5. The DSL at St. John's on-the-Hill School is:
Lisa Duncan
07471 350717 or 01291 622045
duncanl@stjohnsonthehill.co.uk

The Deputy DSLs are
Jason Dobbie (Deputy Head)
07471 350706

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Owner: Deputy Head Pastoral DCS

Jess Barton (Pre-prep)
01291 622045 or 07471 350717
bartonj@stjohnsonthehill.co.uk

6. The DSL at Dean Close Preparatory School is:

Emma Bailey
07884 667302 or 01242 258000
ecbailey@deanclose.org.uk

The Deputy DSL is:
Alice Gould (Fortfield Houseparent)
01242 258030 or 07825 373733
agould@deanclose.org.uk

7. The DSL at Dean Close Pre-Preparatory School is:

Carolyn Shelley (Headmistress)
07867 392292 or 01242 258079
DCPPSHeadmistress@deanclose.org.uk

The Deputy DSL is:
Anna Moorhouse (EYFS Co-ordinator)
01242 258079
avmoorhouse@deanclose.org.uk

8. **Other useful contact details**

Gloucestershire Social Care:
Children and Families Helpdesk: 01452 426565
(Monday – Friday 8am – 5pm) childrenshelpdesk@gloucestershire.gov.uk

Emergency Social Care duty team: 01452 614194

Gloucestershire Safeguarding Children Board (GSCB) 01452 583636 www.gscb.org.uk

Newport Children and Family Services: 01633 656656
After 5pm, on weekends or bank holidays contact: South East Wales Emergency Duty Team: 0800 3284432

Local Authority Designated Officer (LADO) 01452 426994 gscb@gloucestershire.gov.uk

Ofsted 08456 404040

Police Control Room 101

Disclosure and Barring Service (DBS) 01325 953795

9. The Dean Close Foundation is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions to have 'due regard to the need to prevent young people from being drawn into terrorism'. This is known as the prevent duty.
10. Any concerns about radicalisation or terrorism should be either reported to the police by phoning 101 or by calling the confidential Anti-Terrorism Hotline on 0800 789321. The Department of Education's counter extremism helpline can also be contacted on 020 7340 7264 (office hours) or counter.extremism@education.gsi.gov.uk .
11. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where FGM appears to have been carried out on a girl under the age of 18.
12. Concerns about Female Genital Mutilation (FGM) should be reported to the police who will request specific details as outlined in the Home Office guidance. If the girl is at immediate risk 999 should be called
13. **Trustees:** Each School within Dean Close has a designated member of the Board of Trustees with particular responsibility for Child Protection matters; they are currently Mrs Sara Hirst (DCS and Foundation), Mr Stephen Drew (DCPS), Mrs Helen Daltry (DCSJH) and Mrs Karen Riding (DCPPS).

Trustees may be contacted through the Bursary 01242 258086 bursary@deanclose.org.uk

Childcare (disqualification) Regulations 2009 – Disqualification by association

14. The Foundation carries out police and enhanced DBS checks for all those wishing to work at Dean Close Foundation schools in either an employed or voluntary capacity to ensure that they are not prohibited from doing so by the Secretary of State. Prevent guidance is also followed.
15. In addition the Foundation is aware that there are wider disqualification criteria that need to be applied for members of staff who:
 - a. Work in early years provision (including teachers and support staff working in the classroom)
 - b. Work in later years provision for children under the age of eight including all before and after school activities
 - c. Are directly concerned in the management of pupils under the age of eight
16. As good practice, the Foundation will ensure that all members of the Dean Close community that have regular contact with pupils under the age of eight, regardless of the section of the School they normally work in, will be assessed using the disqualification criteria.
17. In addition to inclusion on the Children's Barred List, the wider disqualification criteria include:
 - a. Being cautioned for or convicted of certain violent and sexual criminal activities against children and adults

- b. Grounds relating to the care of children (including where an order is made in respect of a child under the person's care)
 - c. Having registration refused or cancelled in relation to childcare or children's homes or being disqualified from private fostering
 - d. Living in the same household where another person who is disqualified lives or works (disqualification 'by association').
18. The Foundation will ensure that all employees, and potential members of staff shortlisted for vacancies included in the criteria above, will be asked to provide any relevant information about themselves or members of their household via the Staff Suitability Self Declaration Form (see appendix E).
19. Any information that might suggest that a person is disqualified from working with children either directly or 'by association' will be passed to Ofsted as soon as practicably possible, but at the latest within 14 days of the Foundation being aware of the information.
20. If the Foundation becomes aware that a member of staff is disqualified, the implications will be explained and details of how to apply for a waiver from Ofsted may be provided. If there are any queries about whether a person should be disqualified or whether information should be passed to Ofsted, the LADO will be consulted as soon as practicably possible.

Aims and objectives

21. The Dean Close Foundation fully recognises its responsibilities for Safeguarding and Child Protection and its moral and statutory responsibility to safeguard and promote the welfare, health and safety of all pupils, including boarders, those with SEND and those in EYFS. The Foundation is concerned to promote a positive, supportive and secure environment in keeping with its Christian ethos. Consequently the overall aim of this policy is to safeguard and promote the welfare of the children in the care of the Foundation and recognise that all pupils are entitled to protection from abuse and neglect. It also recognises that all staff and pupils are entitled to a fair hearing in case of any allegation of abuse. The Foundation is committed to providing appropriate training and support to all staff in matters of pupil safeguarding including:
- a. Training at least every two years for the DSL and Deputy DSL
 - b. Training at least every three years for all other members of staff
 - c. Compliance with all safer recruitment legislation and good practice
 - d. Ensuring that all staff read as a minimum Part One and Annex A of KCSIE and a signed record kept of who has (those in contact with older pupils should also read Part Five)
 - e. Ensuring that all staff have read this policy and the Staff Code of Conduct and a signed record is kept of who has
 - f. Ensure that all staff are aware of and trained in the Prevent duty
 - g. Continuing to develop awareness in all staff of the need for Safeguarding and Child Protection and of their responsibility in identifying pupils who may be suffering abuse, and in identifying abuse, including signs of abuse and what to look for
 - h. Ensuring that all staff are aware of referral procedures within the Foundation, feel able to raise concerns and feel supported in their Safeguarding role
 - i. Ensure that staff are aware that some groups of pupils such as SEND and looked after children are more vulnerable to abuse

- j. Monitoring children who have been identified as 'at risk' or 'in need'
- k. Ensuring that the Foundation recognises the importance of Inter-Agency work by maintaining contact with relevant local agencies
- l. Ensuring that the concepts of the 'Common Assessment Framework' and 'the Team around the Child' are embedded in all Foundation Safeguarding and Child Protection procedures
- m. Ensuring that key concepts of Safeguarding and Child Protection are integrated into the curriculum across the Foundation at an age appropriate level
- n. Creating an environment where pupils feel secure, have their viewpoints valued, are encouraged to talk and are listened to
- o. To ensure that all Foundation pupils are safeguarded at all times whether on or off Foundation premises. This will ensure that any staff in contact with pupils from other organisations have been subject to suitable checks and assurances that safeguarding procedures are followed will be obtained from the organisation. Where practicably possible, Foundation staff will accompany pupils whilst in the care of outside organisations
- p. Ensuring that all pupils know of at least one adult that they can approach if they are worried or in difficulty
- q. Ensuring that outside agencies are involved where appropriate
- r. Ensuring that all staff are aware of how to refer to Social Care
- s. Keeping an open mind about the possibility of a Safeguarding or Child Protection issue arising
- t. Ensuring that staff always act in the interests of the child
- u. Ensuring all staff participate fully in the provision of Early Help
- v. Ensuring that staff are aware of the procedures if a child is missing from education.

22. Terminology

- a. **Safeguarding and promoting the welfare of children** refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.
- b. **Child protection** refers to the processes undertaken to protect children who have been identified as suffering or being 'at risk' or 'in need'.
- c. **The Foundation** refers to Dean Close School, Dean Close Preparatory School and Dean Close Pre-Preparatory School and Dean Close St. John's on-the-Hill School. It includes all policies, procedures and personnel attached to the four schools.
- d. **Staff** refers to all those working for or on behalf of the Foundation: including full-time, part-time and regular visiting staff, in either a paid or voluntary capacity. This includes Trustees.
- e. **Children/Pupils** refers to all young people who have not yet reached their 18th birthday, and all pupils on the roll of a Foundation school including those over 18.
- f. **Foundation Lead for Safeguarding** refers to the person responsible for coordinating Safeguarding policy and practice throughout the Foundation schools

- g. Headmaster or Headmistress** refers to the head teacher of the appropriate school in the Foundation
- h. Warden** refers to the CEO of the Dean Close Foundation
- i. SEND** refers to pupils with special educational needs and disabilities
- j. Early Help** means taking action to support a child, young person or their family as soon as the need emerges rather than waiting for it to escalate.

Roles and responsibilities

23. Responsibilities of the Board of Trustees

The Board of Trustees will ensure that:

- a. The Safeguarding and Child Protection policy is reviewed and approved annually in June and ratified by the Chair of Trustees
- b. Other Safeguarding policies (such as Safer Recruitment, Staff Code of Conduct and Anti-Bullying) are in place and reviewed regularly
- c. Safeguarding and Child Protection is included as an agenda item at every Board of Trustees meeting. Minutes of Trustee meetings are kept
- d. There are effective Safeguarding, Staff Code of Conduct and Safer Recruitment policies and procedures in place
- e. A Trustee with specific responsibility for Safeguarding and Child Protection is appointed for each school within the Foundation
- f. A DSL is appointed from the Senior Leadership Team (SLT) of each school within the Foundation and that there is a Deputy DSL in each school and that they all receive training every two years
- g. The Trustees with particular responsibility for Safeguarding and Child Protection meet with the appropriate DSL at least termly, and will report to the Trustee Board and raise any Safeguarding or Child Protection concerns or issues. The designated Trustees will receive training every three years
- h. All other staff are trained regularly in accordance with advice from GSCB, at least every three years
- i. Pupils have opportunities to learn about safeguarding as part of the curriculum at an age appropriate level
- j. The 'voice of the child' is heard and that the Foundation has an 'it can happen here' attitude
- k. All Trustees comply with their duties under legislation
- l. Procedures are in place to handle allegations against members of staff and that any such allegations are referred to the LADO and DBS as necessary
- m. The appropriate authority, time, funding, training, resources and support is given to the DSLs to take part in Safeguarding and Child Protection procedures including strategy discussions and inter-agency meetings
- n. The Foundation schools have an appropriate Child Missing From Education policy in place

24. The role of the Chair of Trustees

- a. To inform and liaise with relevant external agencies if there is an allegation against a Headmaster or Headmistress or Warden

- b. To ensure that the designated Safeguarding and Child Protection Trustees are appointed and meet with the appropriate DSL
- c. To read and ratify the Safeguarding and Child Protection policy annually and following any significant revisions

25. The role of the Head of each school

- a. To ensure that the Board of Trustees ratified Safeguarding and Child Protection policy is followed by all staff
- b. To appoint and support a DSL and Deputy DSL in each school
- c. To ensure that appropriate checks are carried out on all staff by the Human Resources department To ensure that any person over the age of 16 who is living onsite but not employed by the School is DBS checked and has received appropriate safeguarding training.

26. The role of the Warden (CEO)

- a. To ensure that the Headmaster or Headmistress in each school monitors the DSL and deputy DSL and that the correct safeguarding procedures are known and understood
- b. To ensure that the Human Resources department carries out appropriate checks on all staff and that a single central record of identity, qualification and DBS checks is kept
- c. To keep the Board of Trustees informed of changing safeguarding requirements
- d. To monitor the progress of any major safeguarding concerns or investigation of Foundation procedures by an outside agency
- e. To meet regularly with the Foundation DSL with particular reference to strategy and Foundation issues

27. The role of the Designated Safeguarding Lead (DSL)

See job description in appendix A

The Policy

28. This policy applies to all staff, trustees and volunteers working within the Foundation and all pupils including boarders, pupils with SEND, EAL and those in Early Years Foundation Stage (EYFS). The Foundation is fully committed to ensuring that the application of this Safeguarding and Child Protection policy is non-discriminatory in line with the UK Equality Act 2010.

29. The main elements of the policy are:

- a. That it fulfils the requirements of the Department for Education (DfE) child protection guidance as stated in Keeping Children Safe in Education (KCSIE) (September 2018)
- b. That it follows guidelines provided by the GSCB
- c. That it ensures the Foundation operates the suitability checks required by the DBS and those of the Independent School Standards Regulations when checking the suitability of staff to work with pupils.
- d. That assurances have been received that employees of other organisations supervising Foundation pupils when in or away from Foundation schools have undergone the necessary checks
- e. It raises awareness of Safeguarding and Child Protection issues throughout the Foundation and ensures that pupils are equipped with the appropriate skills needed to keep them safe

- f. That it develops and implements procedures for identifying and reporting cases, or suspected cases, of abuse
- g. That it supports pupils who have been abused in accordance with an agreed 'Child in Need', 'Child at Risk' or Child Health and Education Plans
- h. That it recognises and supports vulnerable pupils such as those with SEND or difficult family circumstances
- i. Offers a coordinated approach to Early Help.

30. This policy will be made available on the website of each school and copies will be provided to parents on request. In addition it will also be made available to all staff in the Foundation, and to older pupils occupying positions of responsibility.

31. This policy is renewed annually by the Foundation's Lead for Safeguarding in conjunction with DSLs and the designated Trustees to ensure that it reflects current legislation and local GSCB procedures.

In-school Procedures

32. All staff receive regular safeguarding training from the DSL, GSCB or other outside agencies. This includes:

- a. Identification of safeguarding issues
- b. Procedures to be followed as outlined in this policy
- c. Other aspects of the policy such as the Staff Code of Conduct
- d. A consideration of other relevant school policies mentioned in this document such as the Anti-Bullying, Behaviour and Whistleblowing policies
- e. An awareness of other organisations and documents that can be consulted
- f. An awareness of statutory duties such as the reporting of FGM and Radicalisation (Prevent duty) to the relevant authorities (or via the DSL)
- g. Identity of the DSL and deputy DSL and contact details. Assurance that the DSL (or deputy) is available at all times during term time. In the very unusual case that the DSL and deputy for a school is not available, the DSL from another school in the Foundation should be contacted
- h. Awareness of vulnerable groups, how Early Help is offered and the possibility of Peer-on-Peer abuse.

33. All staff are able to identify the DSL and deputy DSL to whom they have ready and confidential access.

34. All staff are required to sign on an annual basis to say that they have:

- a. Read the up-to-date version of KCSIE Part One and Appendix A. The DSL will inform staff of any changes that occur during the course of the year (those in contact with older pupils should also read Part Five)
- b. The Foundation Safeguarding Policy
- c. The Foundation Anti-bullying policy
- d. The individual school Behaviour Policy
- e. Successfully completed Child Protection and Safeguarding training in the last three years
- f. Successfully completed Prevent training
- g. Are aware of the Foundation Whistleblowing policy

35. The Foundation uses age appropriate filters on all IT systems within the schools to restrict access to illegal and inappropriate sites as well as monitor internet usage and sites accessed. Any attempt to access extremist or terrorist sites, extreme or violent pornography or illegal sites would be blocked and reported.
36. The visiting speaker policy outlines the procedures that should be followed when inviting a person to speak to pupils. A member of staff should be present whilst the speaker is in contact with pupils to monitor content for safeguarding or counter-terrorism concerns.

Safeguarding concerns

37. Any child may be the subject of abuse or may be in need of early help intervention but all staff should be alert to the potential need for intervention for a child who:
 - a. Is disabled and has specific additional needs
 - b. Has special educational needs (SEND or EAL)
 - c. Is a young carer
 - d. Is showing signs of being drawn into anti-social or criminal behaviour
 - e. Is frequently missing or goes missing from home
 - f. Is misusing drugs, alcohol or other substances
 - g. Has challenging family circumstances including substance abuse or mental health issues
 - h. Is at risk of being radicalised or exploited.
38. There will be occasions when a member of staff suspects that a pupil may have a significant welfare issue but there is no real evidence of a Safeguarding or Child Protection concern. Signs to be aware of include:
 - a. Behavioural changes
 - b. Signs of confusion or distress in written or practical work
 - c. Physical changes
 - d. Bullying or suspicion of bullying
39. In these circumstances the member of staff should give the pupil an opportunity to talk and discuss the observed signs.
40. Particular notice should be given to vulnerable pupils and staff need to be aware of the possibility of Peer-on-Peer abuse
41. KCSIE makes it clear that any member of staff may make a referral to external agencies. However, it is normal Foundation practice to pass information to the DSL in the first instance.
42. Staff should not assume that someone else will take action so therefore should share information that might be critical in keeping a child safe promptly. This is everyone's responsibility.
43. If the pupil begins to reveal information of a Safeguarding or Child Protection nature, the procedures below should be followed. It is better to raise concerns which may not need action than to do nothing or delay reporting. Always act in the interests of the child and maintain an 'it can happen here' attitude.

44. DSL's operate an 'open door' policy for the reporting of safeguarding issues and child protection concerns. A DSL or deputy is always available either in person or on the phone in term time.

45. Staff need to be aware that pupil relationships can be abusive and may need to be investigated as a Safeguarding or Child Protection issue. A pupil may make an allegation of abuse against another pupil, in which case, the procedure below should be followed. (*see Anti-Bullying policy and Peer-on-Peer Abuse Policy*)

46. Procedure for when a pupil makes a disclosure of abuse

- a. Allow the pupil to speak freely and lead the discussion
- b. Recognise the courage the pupil is showing by making the disclosure
- c. Recognise that there is a relationship of trust between the pupil and yourself
- d. Make it clear at an early stage that confidentiality cannot be guaranteed
- e. Remain calm and do not over react
- f. Listen, be supportive and offer reassurance
- g. Accept what the pupil is saying without challenge
- h. Do not offer any admonishment or criticism of the pupils actions or lack of action
- i. Allow silences
- j. Do not ask leading or investigative questions
- k. Be cautious about any physical contact
- l. Do not apportion blame or criticise others mentioned in the disclosure
- m. If the information that has been disclosed needs to be passed on, explain to the pupil what will happen next
- n. If the pupil appears to be 'at risk' or 'in need' the information must be passed on to the DSL (or Deputy DSL) as soon as practicably possible
- o. If the child is found to be 'in need' the case will be referred to Social Care
- p. If the child is found to be 'at risk' Social Care will be contacted as soon as practicably possible
- q. If the disclosure is of a safeguarding nature, it should be discussed with the DSL without delay
- r. A written account of the conversation should be made as soon as possible. If a body map is used it must be completed with the pupil fully clothed. Under no circumstances should a member of staff ask a pupil to remove or adjust clothing. Only parts of the body normally visible should be viewed and recorded
- s. If the pupil is in danger of immediate harm, the Police should be contacted first
- t. It is not the responsibility of the school to investigate suspected cases of abuse prior to informing Social Care and/or the LADO
- u. Legal action against the perpetrator of abuse can be compromised by inappropriate actions by individuals or the school and by not following this guidance
- v. Parents are normally notified (by the DSL) as soon as practicably possible of any concern, suspicion or disclosure of a Safeguarding or Child Protection nature. However if it is believed that notifying parents could increase the risk to the child or exacerbate the situation, advice will first be sought from Social Care.

47. Procedure for when an allegation of child abuse is made against another pupil (to be carried out in conjunction with the Anti-bullying and Peer-on-Peer Abuse policies. The Youth Produced Sexual Imagery Policy may also be relevant)

- a. The disclosure should be listened to and recorded following the steps outlined above

- b. The Foundations Anti-bullying policy, Peer-on-Peer Abuse Policy, Youth Produced Sexual Imagery policy and individual school behaviour policy should be considered when a pupil makes a disclosure involving another pupil
- c. Behaviour of an abusive or bullying nature should be managed following the School's Anti-bullying policy or Peer-on-Peer Abuse policy
- d. Behaviour which raises Safeguarding or Child Protection concerns should be referred to the DSL as soon as practicably possible
- e. If a disclosure or allegation of abuse is made by a pupil against another pupil, it will be referred to Social Care without delay
- f. Pupils who abuse others may well have been abused themselves so Child Protection procedures need to be followed for both victim and perpetrator
- g. Bullying or abuse of pupils by pupils can occur within the boarding community particularly in less structured times. Boarding staff are aware of the risk and monitor pupils, particularly those from vulnerable groups such as SEND or EAL for signs of bullying, being bullied or abuse. Tutors and other boarding staff play a pivotal role in the prevention and monitoring of situations likely to give rise to bullying or abuse
- h. Peer-on-peer abuse where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' is likely to be reported to social care and all pupils involved considered to be 'at risk'
- i. Prefects and older pupils with positions of responsibility will receive appropriate Safeguarding and Child Protection training including identification of signs of abuse and appropriate action to take if they become aware of any Safeguarding or Child Protection concern
- j. Pupils who make malicious allegations against another pupil or a member of staff will be dealt with in line with the School's Behaviour Policy
- k. If it is suspected that a crime has been committed, the police will be informed.

48. Procedure for when an allegation is made against a member of staff (including volunteers)

- a. Part 4 of KCSIE provides detailed guidance on these issues
- b. Allegations against staff, including the DSL and volunteers, must be reported straight away to the Headmaster or Headmistress or in his or her absence the Warden who will refer to the Chair of Trustees
- c. The LADO should be informed without delay, of any allegation against a member of staff or volunteer that meets the criteria that the adult:
 - i. Behaved in a way that harmed a child, or may have harmed a child
 - ii. Possibly committed a criminal offence against or related to a child
 - iii. Behaved towards a child or children in a way that indicates that they would pose a risk of harm if they work regularly or closely with children
- d. The LADO should be informed within one working day of all allegations that come to the Foundations' attention or that are made directly to the Police
- e. The LADO will advise on subsequent actions
- f. In borderline cases, informal discussions will be held with the LADO without names or personal details being disclosed
- g. The LADO is pivotal in providing advice when an allegation is made
- h. The LADO presides over any abuse allegation or suspicion of abuse directed against anyone working for the Foundation.
- i. Staff who are concerned about the conduct of a colleague towards a child must remember to act in the interests of the child despite any issues this may cause for the colleague or the Foundation
- j. The Foundation Whistleblowing policy enables all staff to raise concerns or allegations in confidence and without prejudice

- k. The Foundation will make every effort to maintain confidentiality and guard against unwanted publicity
- l. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretation of events can and do happen
- m. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. All unnecessary delays should be eradicated
- n. If an accusation is made against a member of boarding staff, or if a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements will be made for alternative accommodation away from pupils. This may be in a Foundation or rented property
- o. The Foundation will not undertake their own investigations without prior consultation with the LADO, or, in the most serious cases, the Police, so as not to jeopardise statutory investigations
- p. All discussions should be recorded in writing
- q. Communication with both the individual and the parents of the child should be timely and accurate
- r. Suspension of a member of staff is not mandatory or automatic and is done without prejudice to the outcome of any inquiry
- s. Possible suspension of the member of staff, against whom an allegation has been made, will be carefully considered after consultation with the LADO
- t. Resident members of staff who have been suspended pending investigation of an allegation will be accommodated off-site
- u. Malicious, unsubstantiated and unfounded allegations will be removed from staff personal records and will not be referred to in employer references
- v. Any person (whether employed, contracted, a volunteer or pupil) who has harmed or poses a risk of harm to a child and who has been removed from working with children, or would have been removed had they not left earlier, will be reported promptly to the Disclosure and Barring Service (DBS)
- w. A member of staff will be referred to the Teacher Regulation Agency (TRA) if they have been dismissed or would have been dismissed had they remained in employment, for misconduct

49. Procedure for when an allegation is made against the Headmaster or Headmistress, Warden or Chair of Trustees

- a. Allegations against the Headmaster or Headmistress or Warden must be reported to the Chair of Trustees who reports it to the LADO within one working day
- b. The Headmaster or Headmistress or Warden will not be informed until advice has been sought from the LADO
- c. Allegations against the Chair of Trustees must be reported to the LADO within one working day

50. The flow chart in appendix D helps guide colleagues in what to do if a disclosure is made.

51. In order to avoid misconceptions of behaviour, all staff should follow the advice given in the following Foundation documents all of which are available:

- a. *Staff Code of Conduct (See appendix B)*
- b. *Anti-Bullying Policy*
- c. *School Behaviour Policies*
- d. *Complaints – Students and Parents Policy*
- e. *Safer Recruitment Policy*

- f. *Youth Produced Sexual Imagery Policy*
- g. *Peer-on-Peer Abuse Policy*

Confidentiality and information sharing

- 52. Safeguarding and Child Protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved, but also to ensure that evidence is not compromised by being released into the public domain.
- 53. Safeguarding issues should be discussed with the minimum number of people and usually only with the DSL in the first instance although other staff such as the relevant Housemaster or Housemistress (HsM) or member of SLT may be better placed to give initial advice for a lower level concern.
- 54. Safeguarding records should be carefully kept in a locked facility with limited access. Child Protection records are kept in a locked facility by the DSL separate from other pupil records. A pupil may be flagged on the School database or other pastoral software as having Safeguarding or Child Protection information attached to them: in which case information should be sought from the relevant DSL as necessary.

Staff training and information

- 55. All staff and designated Trustees will be regularly trained in Child Protection and Safeguarding. Training will be provided at least every three years and a record will be kept. This training will be GSCB approved and may consist of completing an online module, training delivered by the DSL or training delivered by GSCB. This includes the Headmaster or Headmistress, Warden and Trustees.
- 56. The DSL and Deputy DSL will be trained at least every two years. The DSL is responsible for the organisation and standard of training. Temporary, voluntary and visiting staff will be given the 'Child Protection at Dean Close' card and access to this policy and KCSIE part 1.
- 57. The Foundation's Staff Code of Conduct give detailed guidance on how all staff should conduct themselves in each section of the Foundation in order to avoid any misconceptions of behaviour or unfounded Safeguarding allegations (see appendix B). This includes appropriate use of mobile phones and other devices including cameras. Staff should only take photos of pupils for school use and not store them on personal devices, please see Staff Acceptable Use if IT policy. Staff in EYFS and EYFS settings have separate guidance, please see DCPPS Mobile Phone and Camera Policy (PP312).

Safer recruitment

- 58. All staff recruitment at the School is informed in particular by part 3 of KCSIE and 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'.
- 59. All interview processes involve a safer recruitment trained member of staff. The Chair of Trustees and the Lead Nominated Safeguarding Trustee receive safer recruitment training every five years.
- 60. A Single Central Record (SCR) of employment within the Foundation is compiled and updated by the Human Resources department in the Bursary.

Date of Issue: March 2018
Review Date: April 2019
Owner: Deputy Head Pastoral DCS

61. All visitors on one of the Foundation sites including visiting speakers and volunteers are checked in accordance with safer recruitment requirements. The procedures outlined in Prevent are also followed.

Pupil education

62. Key elements of Safeguarding and Child Protection are incorporated into the curriculum at age appropriate levels. Issues such as appropriate relationships, bullying, e-safety, personal safety and mental health are primarily taught in PHSE lessons although they also form part of the Biology, RS and English schemes of work. All academic teachers are aware that issues of a Safeguarding or Child Protection nature may come to light in any lesson and are aware of the procedures to follow. Outside agencies are often invited to the School to discuss age appropriate issues relevant to Safeguarding and Child Protection.

63. The Pupil Behaviour policies and the acceptable use of ICT policies include guidance on the use of mobile phones and cameras at an appropriate level for each school. Pupils are encouraged to use their phones sensibly and report any concerns to a member of staff. The school reserves the right to search any mobile phone or other device for inappropriate messaging or photographs (please see Youth Produced Sexual Imagery Policy).

64. The PSHE programme of study will ensure that all pupils understand, at the appropriate level the dangers of extremism and radicalisation as outlined in Prevent. They will be encouraged to report any concerns.

65. The PSHE programme will ensure that pupils are aware of other types of abuse, as outlined in this document, at the appropriate level. They will be encouraged to report any concerns

66. The tutorial or other pastoral programme is designed to include age appropriate discussion about relationships, consent, boundaries, appropriate communication and other issues of concern. Where age appropriate, notices are displayed around each school giving contact details for the school counsellor, the independent listener, helplines and other relevant agencies. Pupils are informed about the people they can talk to including older pupils, the pastoral staff, medical professionals and the Chaplaincy team. Prefects and other senior pupils receive Safeguarding and Child Protection training as appropriate.

67. The Foundation schools have appropriate IT filtering system will age appropriate filters set in different sections of the schools. Illegal websites such as those promoting extremism, radicalisation, terrorism, extreme pornography and the sale of illegal substances cannot be accessed via the School Internet. Pupils receive guidance on accesses such sites through their own electronic devices.

68. Internet usage is monitored throughout the Foundation. Attempts to access banned or unsuitable sites is recorded and patterns of online behaviour observed.

Signs of abuse

69. All Foundation staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that are easily defined. In most cases, multiple issues overlap.

Date of Issue: March 2018

Review Date: April 2019

Owner: Deputy Head Pastoral DCS

70. Somebody may abuse or neglect a child by inflicting harm, or by knowingly not preventing harm. Children may be abused in a family, the community, an institutional setting by someone known to them, or more rarely by a stranger. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Most young people who are abused know their abuser. They may be abused by an adult or adults, child or children.
71. KCSIE sets out definitions and examples of four broad categories of abuse:
72. **Physical abuse:** This 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.
73. Children regularly collect bumps and bruises but it does not mean they are being abused. Injuries need to be considered in the light of the age of the child, their stage of development, where injuries are on the body and any explanation given.
74. Indicators of physical abuse include bruises, grip marks, cigarette burns, bite marks, swelling, fractures, injuries in an area of the body that is unlikely to be harmed in everyday activity, and injury with no explanation or conflicting explanation.
75. **Emotional abuse:** This is persistent emotional maltreatment which is likely to cause serious harm to the child's health and emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It also includes rejecting or ignoring a child completely, using degrading language or behaviour towards them, rejecting social interaction with them, threatening them, encouraging self-destructive behaviours and allowing a child to witness mistreatment of another. It may involve serious bullying causing children to feel frightened or in danger. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
76. Indicators of emotional abuse can be difficult to identify but include developmental lags, acceptance of excessive punishment, over-reaction to mistakes, self-deprecation, fear of new situations, inappropriate emotional response, neurotic behaviour, self-harm or substance abuse. Children suffering emotional abuse may have difficulty forming relationships, seek attention inappropriately, be withdrawn, underachieve or show other signs of disturbed behaviour.
77. **Sexual abuse:** This is forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. This may involve physical contact, penetrative or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It can also include involving children looking at or watching pornographic material or watching sexual acts and 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 and other children can also commit acts of sexual abuse.

78. Indicators of sexual abuse include damage to or soreness in genitalia, anus or mouth, sexually transmitted disease, pregnancy, urinary tract infection, inappropriate sexual knowledge, sexually provocative behaviour, personality or character change, poor trust in significant adults, insecure or regressive behaviour or self-harm. Many children who are sexually abused will have no visible signs due to the attacker not wanting to leave evidence.
79. **Neglect:** This is persistent failure to meet a child's basic physical and psychological needs which is likely to result in serious impairment to their health and development. This may involve a parent or carer failing to provide food, shelter, clothing or a failure to protect from physical or emotional harm or danger, not ensuring adequate supervision, or not allow access to medical care or treatment. It may also include the neglect of a child's basic emotional needs.
80. Neglect may also result in a child being diagnosed as suffering from 'faltering growth' also known as 'failure to thrive'. This would usually be diagnosed in a young child by a medical practitioner.
81. Indicators of neglect include constant hunger or tiredness, frequent lateness or non-attendance, destructive tendencies, poor social relationships, poor personal hygiene, poor general health or untreated medical problems.

Staff also need to be aware of other specific forms of abuse further details of which can be found in Annex A of KCSIE:

82. **Female Genital Mutilation (FGM):** This involves procedures that include the partial or total removal of external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious consequences for physical and mental health. **FGM is illegal in the UK.**
83. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police that FGM appears to have been carried out on a girl under 18. Teachers must personally report to the police although referral to the DSL / Social Care should also be done.
84. Victims of FGM are likely to come from a community that is known to practice FGM. Specific risk indicators include:
- a. Poor integration of the family into UK society
 - b. The daughter of a woman who has undergone FGM or where another close family member such as a sister has undergone FGM
 - c. Any girl withdrawn from PSHE lessons particularly if from a high risk group and specially if the lesson is about sex or FGM
 - d. The visit of a family elder from the country of origin to a family where a daughter is of FGM age (typically 5 -8 although FGM has been performed on girls from infancy to 15 years of age)
 - e. A girl talking about FGM; reference by a girl to a special procedure; a girl going on a long or unexpected holiday to the country of origin or where FGM is practiced
 - f. Changes in behaviour, medical issues unspecified requested for help from an adult particularly if medically orientated.

85. If a girl has been recently cut or is at imminent risk 999 should be called. Safeguarding procedures should be followed if FGM is reported or suspected and specific guidance sought from the police and social care
86. **Preventing radicalisation:** The Prevent Duty document from the Department of Education clearly identifies the definition of, how schools should comply and how schools can seek guidance for the prevention of extremism and radicalisation in pupils.
87. All staff are Prevent trained and are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Staff know to be aware of changing in a pupil's behaviour which may indicate extremism such as the expressing or withholding of views. The DSL is the School lead on the Prevent duty and should be contacted about any concerns of a radicalisation or extremism nature
88. Advice can be sought from the Department of Education dedicated telephone helpline on 020 7340 7264 or via email on counter.extremism@education.gsi.gov.uk or from the police on 101. In an emergency 999 should be called.
89. **Child Sexual Exploitation:** Child Sexual Exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity
- a. In exchange for something the victim needs or wants And/or
 - b. For the financial advantage or increased status of the perpetrator or facilitator

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. **Child Sexual Exploitation is illegal in the UK.**

90. In CSE the perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. Some young people who are being sexually exploited do not exhibit any external signs of this abuse.
91. **Domestic violence:** This is underestimated in the UK. Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged over 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality is defined as domestic abuse. The abuse can encompass, but is not limited to:
- a. Psychological
 - b. Physical
 - c. Sexual
 - d. Financial
 - e. Emotional.

92. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life. There is a proven link between domestic violence and child abuse.
93. **Forced marriage:** This is when one or both spouses do not or cannot consent to the marriage and duress is involved. This can include physical, sexual, emotional and financial pressure. Indicators of forced marriage include sudden and unexpected foreign travel, withdrawal from education and behavioural changes. Forced marriage is different to arranged marriage where consent is freely given.
Forced marriage is illegal in the UK
94. **Children missing from education:** A child going missing from education is a potential indicator of abuse or neglect, travel to a conflict zone, FGM or forced marriage. Foundation staff should treat prolonged or repeated absence or particular patterns of absence with no satisfactory explanation as a potential safeguarding issue and take action accordingly by following the Child Missing Education policy relevant to the particular school. A record of children missing from education should be kept, particularly if absence is repeated, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of them going missing in the future. All staff should be alert to signs to look out for and for the individual triggers to be aware of (as detailed in this policy) when considering the potential safeguarding concerns such as travelling to conflict zones (radicalisation), FGM and forced marriage.
95. **Sexual violence and sexual harassment between children in schools:** This can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
96. Sexual violence and harassment exist on a continuum and may overlap, they can occur online and offline and are never acceptable. All victims will be taken seriously and will be offered support in school. All instances of sexual harassment or violence will be reported to the DSL.
97. The Foundation is committed to tackling behaviour that could be construed as sexual violence or harassment and providing education through PSHE, tutorials and other means. Staff are aware that children can and do abuse their peers in this way. In particular the Foundation will challenge:
- Behaviour and 'banter' of a sexualised nature e.g. not dismissing sexual comments or allowing inappropriate touching
 - Challenging sexual jokes, stories or comments
 - Online sexual harassment
 - The understanding of consent and whether it has been freely given
98. The Foundation is aware that certain groups of pupils such as girls, SEND and LGBT are at greater risk of sexual violence and harassment.
99. Other Safeguarding and Child Protection issues that staff need to be aware of include:
- Bullying including cyber-bullying (*see Anti-bullying policy*)

Date of Issue: March 2018

Review Date: April 2019

Owner: Deputy Head Pastoral DCS

- b. Illegal substances including drugs
- c. Faith abuse
- d. Gangs and youth violence
- e. Child criminal exploitation
- f. Gender-based violence and violence against women and girls (VAWG)
- g. Mental health
- h. Sexting and other online abuse (*see Youth Produced Sexual Imagery Policy*)
- i. Teenage relationship abuse
- j. Trafficking
- k. Child missing from home or care
- l. Fabricated or induced illness
- m. Peer-on-Peer Abuse (*see Peer-on-Peer Abuse policy*)
- n. So called 'honour-based violence'

Appendix A

Designated Safeguarding Lead (DSL) – job description

1. To lead in facilitating the development of Safeguarding and Child Protection policies, training and procedures and guidance for each school within the Foundation, ensuring that the Safeguarding and Child Protection Policy is reviewed annually by the Board of Trustees
2. To ensure that the School Safeguarding and Child Protection Policy is reviewed at least annually by the Foundation DSL and that the procedures and implementation are updated and reviewed regularly
3. To undertake appropriate Child Protection Training at least every 2 years in order to:
 - a. Understand the assessment process for providing Early Help and intervention, e.g. through locally agreed common and shared assessment processes such as Early Help assessments
 - b. Have an understanding of how the GSCB conducts Child Protection Case Conferences and be able to attend these effectively when required to do so
 - c. Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection Policy and procedures
4. To undertake appropriate Prevent Training:
 - a. To ensure staff are able to identify children at risk from being drawn into terrorism
 - b. Ensure that staff are aware of the DfE Prevent Duty documentation
 - c. Ensure that all staff receive appropriate Prevent Duty training
5. To ensure that all staff are provided with induction training, are aware of the identity of their DSL and Deputy DSL and have signed to say they have read:
 - a. The School's Safeguarding and Child Protection Policy
 - b. The staff Codes of Conduct
 - c. Part One and Annex A of KCSIE (those in contact with older pupils should also read Part Five)
 - d. The Foundation Whistleblowing policy
 - e. Are aware of all other school and Foundation policies concerned with pupil welfare
6. To provide training and support, on a regular basis, and in accordance with the requirements of GSCB to all School staff (including newly appointed) and volunteers who work with pupils so that they are aware of School Safeguarding and Child Protection arrangements. To also ensure that all new staff are aware of the Whistleblowing policy
7. To ensure that all staff are aware of the risks of radicalisation in young people; how to identify signs of radicalisation and how to recognise those pupils most at risk of radicalisation
8. To keep staff aware of Safeguarding and Child Protection procedures
9. To have an understanding of GSCB procedures
10. To refer allegations of cases of suspected abuse to Children's Social Care or Police as appropriate, making contact with either of them within 24 hours of a disclosure or suspicion of abuse, in writing or with written confirmation of a telephone referral

11. To make prompt contact with the LADO in relation to allegations made against someone working at the school and/or with the police if a criminal offence is suspected
12. To receive and coordinate referrals, arranging action and reviewing services for children and families
13. To maintain accurate, confidential and up-to-date documentation on all cases of Safeguarding and Child Protection, ensuring that all records are forwarded to any new school the pupil may attend and the appropriate request made of the previous school for the Safeguarding and Child Protection records.
14. To work directly with children 'in need' and their families in order to promote, strengthen and develop the potential of parents/carers and their children in order to prevent children becoming looked after and/or suffering significant harm
15. To support the care of children where their living arrangements are at risk of breakdown (including Local Authority placements)
16. To ensure that children who have suffered or are at risk of suffering serious harm are reported to Social Care immediately and that a multi-agency assessment is requested using the GCSB Multi Agency Service Request Form
17. To ensure that pupils who are victims of abuse are supported appropriately and sensitively and that all actions assigned from planning and intervention meetings are successfully carried out and monitored
18. To have a knowledge of multi-agency working in the local area
19. To inform the Headmaster or Headmistress of Safeguarding issues especially ongoing enquiries under Section 47 of the Children Act 1989 and Police investigations
20. To have at least termly meetings with the appropriate Safeguarding and Child Protection Trustee and ensure that the said Trustee has any relevant information to facilitate Safeguarding and Child Protection discussion at Board of Trustee level
21. To act as a source of support, advice and expertise to staff on matters of Safeguarding and Child Protection and when deciding whether to make a referral by liaising with relevant agencies
22. To ensure that the School is always presented positively within and beyond the setting and to encourage a culture of listening to pupils and taking account of their wishes and feelings on any measure the School might have taken to protect them
23. To ensure that staff are aware of training opportunities and GCSB guidance
24. To develop effective links with relevant statutory and voluntary agencies
25. To ensure that GCSB has access to the School Safeguarding and Child Protection policy and that the policy is published on the School's website
26. Attend and participate in Child Protection Conferences and planning and review meetings whilst working closely with colleagues in Children's Services and meetings with other Agencies, as required

27. To maintain confidentiality at all times
28. To identify vulnerable children within the School and ensure that all staff are made aware of who these children are
29. To ensure a record is kept of staff Safeguarding and Child Protection training
30. To ensure that pupils receive age appropriate Safeguarding and Child Protection training in school
31. To ensure that Safeguarding and Child Protection is included in the School curriculum, appropriate to pupil age
32. To ensure that all staff are aware of the Child Missing from Education policy and procedures
33. To undertake other duties that relate to Safeguarding and Child Protection matters

Foundation Lead for Safeguarding – job description

34. To report to the Warden (CEO)
35. To visit all schools within the Foundation and request information relating to safeguarding and child protection on a regular basis
36. To have safeguarding and pupil welfare oversight for all Foundation schools, advising on procedure and staff appointment
37. To be the lead for safeguarding and welfare policy development

APPENDIX B

Staff Code of Conduct

Introduction

1. Dean Close School takes pride in the friendly and supportive atmosphere that exists between members of staff and pupils. The lack of barriers between pupils and staff creates a happy and productive working atmosphere but all colleagues must be aware that they have a professional relationship with pupils and that discretion must be exercised at all times. There is a difference between being friendly towards pupils and behaving as their friend.
2. Allegations of unprofessional or improper conduct can arise and it is the duty of all members of staff to behave professionally at all times. The purpose of this Code of Conduct is to ensure that colleagues know what acceptable and unacceptable behaviour is in order to maintain the safety of the pupils and guard against allegations of impropriety.
3. It is important that all adults working with children understand that the nature of their work and their responsibilities relating to it, places them in a position of trust. At Dean Close, the welfare of pupils is paramount so it is the responsibility of all adults to safeguard and promote the welfare of pupils. Members of staff are responsible for their own actions and behaviour and should avoid any conduct which would lead a reasonable person to question their motivation and intentions.
4. This guidance is not exhaustive and is designed to set out principles rather than to give detailed and specific advice as the circumstances in which staff work vary.
5. Key documents which inform this policy include:
 - a. Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings 2009
 - b. Keeping Children Safe in Education 2018
6. Other Dean Close policies which relate to this guidance include:
 - a. Safeguarding and Child Protection policy
 - b. Confidentiality policy
 - c. The Use of Force to Control or restrain Pupils policy
 - d. Arrangements for searching pupils and their possessions
 - e. Sex and Relationships policy
 - f. Anti-bullying policy
 - g. First aid policy
 - h. Acceptable use of ICT
 - i. Guidance on Acceptance of Gifts
 - j. Adults Staying in Boarding House
 - k. Behaviour policy
 - l. Data Protection policy
 - m. Educational Visits policy
 - n. Whistleblowing policy
 - o. Youth Produced Sexual Imagery Policy
 - p. Peer-on-Peer Abuse Policy

Duty of care

7. This is the duty which rests upon the School, and the staff within it to ensure that all reasonable steps are taken to safeguard the safety of pupils involved in any activity for which the School is responsible. All staff have a duty to keep pupils safe and protect them from sexual, physical and emotional harm. Children have the right to be safe and to be treated with respect and dignity.
8. Members of staff are accountable for the way in which they exercise authority, manage risk, use resources and protect pupils from discrimination and avoidable harm. The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.
9. The School has a duty of care towards employees which requires the provision of a safe working environment for staff and guidance about safe working practices. Staff who are subject to an allegation will be supported and the principles of natural justice applied.

Confidentiality

10. Members of staff have access to confidential information about pupils in order to undertake their everyday responsibilities. This should not be used for their own or others' advantage and must not be used to intimidate, humiliate or embarrass the pupil.
11. Generally this information should only be shared in serious incidences or when abuse is alleged or suspected. If a member of staff is in any doubt about whether to share information or keep it confidential, guidance should be sought from the DSL or another member of SMT.

Making a professional judgement

12. There may be occasions when adults have to make decisions or take action in the best interests of the child which could contravene this guidance or where no guidance exists. Individuals are expected to behave professionally and in the best interests of the child. Any actions which could be misinterpreted should be reported to a member of SLT without delay.

Power and positions of trust

13. All adults working in School are in a position of trust which can be defined as one in which one party is in a position of power or influence over the other. It is essential that this unequal balance of power is not used for personal advantage or gratification.

Propriety and behaviour

14. Members of staff should always behave in a manner which maintains the confidence and respect of colleagues, pupils, parents and the general public. They should not behave in a way which would lead a reasonable person to question their suitability to work with children or act as a role model. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. Staff should be aware that this extends to using judgement and integrity about behaviour in places other than at School.
15. The School is a no smoking campus. Pupils are punished if caught for smoking within school bounds and should not see members of staff doing so. Away from school premises caution should still be exercised

16. The pupil Code of Conduct states that pupils are not allowed to drink alcohol without permission and should not be inebriated. Whilst it is acceptable for members of staff to drink in front of and with 6th form pupils, it is important to be prudent
17. It is acceptable for members of staff at DCS to consume alcohol with pupils of legal age in moderation and in controlled circumstances with the knowledge of a member of SLT, usually via a risk assessment if away from School premises. National law applies in all circumstances where alcohol is consumed
18. Colleagues should never procure alcoholic drinks for any pupils which could lead to excessive drinking
19. Colleagues who meet pupils, by chance, in unofficial situations such as clubs or bars should refrain from purchasing alcoholic drinks for them or behaving in a manner that would be seen as inappropriate by a reasonable person. This may also apply to parents

Dress and appearance

20. Members of staff should dress in ways which are appropriate to their role. Staff should not wear clothing that could be viewed by a reasonable person as offensive, revealing or sexually provocative. Please refer to the Staff Handbook for further guidance.

Gifts, rewards and favouritism

21. Please see Dean Close Foundation Guidance on Acceptance of Gifts

Guidance for acceptance of gifts by staff from parents or other parties is outlined in the above policy.

22. The giving of gifts or rewards to pupils should be part of an understood process for supporting positive behaviour or recognising particular achievements. The selection of pupils for gifts or rewards should be fair, transparent and involve items of appropriate value. It is essential that the giving of gifts is not misinterpreted as a gesture to bribe or 'groom' a pupil. Therefore perceptions of favouritism or injustice should be avoided.

Infatuations

23. Occasionally a pupil may develop an infatuation with an adult. The adult should deal sensitively and appropriately with the situation in order to maintain the dignity and safety of all concerned. Such infatuations carry a high risk of words or actions being misinterpreted so staff should make every effort to ensure that their own behaviour is above reproach and report any concerns to a senior colleague.

Communication with pupils

24. Please see Pupil and Staff acceptable use of ICT policies

E-safety risks are posed more by behaviours and values than by the technology itself. Staff must ensure that they maintain safe and responsible online behaviours.

25. Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. Adults should not share personal information with a pupil and they should ensure that all communications are transparent and open to scrutiny. Where possible, communication with pupils should be through official school channels such as school e-mail addresses or phone extension. This is not always practical and caution must be taken when using other forms of communication.

26. Texts may be an appropriate way to communicate with older pupils. The content of the text should be brief and business-like. Texts should not be sent at inappropriate times of the day or during the holidays unless urgent. Personal texts should not be exchanged with current pupils. The same guidance applies to mobile phone conversations and written exchanges such as letter or e-mail
27. Caution should be exercised when sending photos via mobile phone. Out of context these can be misconstrued
28. Many pupils use social networking sites such as Facebook. Staff should be wary of disclosing any personal information that is accessible to pupils on such sites. Any photographs that are uploaded should not be potentially embarrassing to the member of staff or other colleagues, pupils or the Foundation
29. If a member of staff has access to web pages created by pupils, caution should again be exercised. Inappropriate material involving pupils or colleagues viewed and not reported by a member of staff to SLT could be regarded as misconduct
30. Be aware that any conversation or interaction with a current pupil either on or off the school premises is part of a professional relationship and will be legally viewed as such

Social contact

31. Members of staff should not establish or seek to establish contact with pupils for the purpose of pursuing a friendship. Any social contact, such as tutor outings, should be approved and risk assessed in advance and the appropriate colleagues informed. Standing risk assessments exist for some activities. Where social contact exists between parents and staff, behaviour and communication on school matters should be appropriate.
32. Tutor outings are an important part of the tutorial system at Dean Close and staff are encouraged to arrange outings on a termly basis. Other than exceptional circumstances, it is unlikely that outings involving only one pupil, or individual visits to the tutor's home without prior parental consent, would pass a risk assessment.

One to one situations

33. Members of staff teaching one pupil, or conducting a one-to-one meeting or tutorial should take particular care in the following ways:
 - a. Use a room in which the meeting can be seen through a window or open door
 - b. If there is any concern, a colleague should be informed before the meeting takes place
 - c. All physical contact should be guided by the information above
 - d. In conversation colleagues or other pupils should not be discussed; any sexual innuendo and displays of affection other than that which is required to meet the needs of the meeting should be avoided
 - e. This includes individual tutor outings
34. Some pupils may be in a fragile or emotional state when a meeting takes place. In these circumstances extra vigilance must be taken not to heighten any distress. If concerns are raised about the words or actions of a pupil during one-to-one contact, or that words or actions by the member of staff may be misinterpreted, the details should be reported to a member of SLT as soon as possible.

Sexual contact

35. Sexual relationships between pupils and members of staff may be regarded as a criminal offence and will always be a matter of disciplinary action. Staff should not have close relationships with pupils or have any form of communication with pupils which could be interpreted as sexually suggestive or provocative. Staff should refrain from discussing their own sexual relationships in the presence of pupils.

Physical contact

36. Please see The Use of Force to Control or restrain Pupils Policy

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they do so in ways appropriate to their professional role as even well intentioned physical contact may be misconstrued.

37. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority; where feasible staff should seek the child's permission before initiating contact. A member of staff must report any physical contact that could be misunderstood to a member of SLT. Staff should also be aware that a pupil might seek inappropriate physical contact. This should be deterred sensitively and reported to SLT.

38. There may be occasions when a distressed child needs comfort and reassurance and this may involve physical contact. Professional judgement should be used to ensure that professional boundaries are maintained.

39. Members of staff who work in settings such as sport, drama or outdoor activities or who teach specific subjects such as PE or music, will have to initiate some physical contact for example to demonstrate or prevent injury. This contact should take place in a safe and open environment, where the actions can be easily observed, and last for the minimum time necessary. Contact should be relevant and sensitive to signs of discomfort. Any incidents of physical contact that cause concern should be reported. It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities.

40. The law permits a member of staff to use such force as is reasonably necessary in the circumstances for the purpose of preventing a pupil from committing any offence, causing personal injury or damage to property, or engaging in any behaviour prejudicial to the maintenance of good order and discipline at the School or on School business, among any of its pupils, whether that behaviour occurs during a teaching session or otherwise. The minimum necessary force should be used and only as a last resort when other strategies have failed.

Behaviour management

41. Please see Behaviour policy

All pupils have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour. Adults should not use any form of degrading treatment to punish a child. Any sanctions or rewards should comply with school policy.

Personal care

42. All pupils have a right to safety, respect, privacy and dignity particularly when in a state of undress, changing clothes, bathing or undertaking any form of personal care. However there is also a need for

an appropriate level of supervision in order to safeguard pupils and/or satisfy health and safety considerations. Adults need to be vigilant about their own behaviour to ensure a balance is struck. Staff should announce their presence in changing or dormitory areas and avoid any visually intrusive behaviour.

First aid and administration of medication

43. Please see First Aid policy

The Health Centre should be informed of all pupil medication. All medical concerns should be referred to the Health Centre.

Transporting pupils

44. It may be necessary for a member of staff to transport a pupil in their own vehicle. If possible there should be an additional adult acting as an escort or another pupil present. Staff need to ensure that:
- a. They are fit to drive and that there is nothing to impair their judgement or ability to drive
 - b. That the vehicle is roadworthy
 - c. All passengers wear seatbelts
 - d. They have the proper and appropriate insurance
 - e. That a senior colleague is informed of any impromptu or emergency arrangements if possible and if not that they are recorded as soon as practicably possible

Educational visits

45. Please see Educational Visits policy

Adults on educational visits, of any length and including tutor outings, remain in a position of trust and need to ensure that their behaviour remains professional at all times. Staff need to ensure that:

- a. A proper risk assessment has been drawn up and approved in advance
- b. There is an appropriate staff to pupil ratio and that the gender mix reflects the pupils involved

Photography and videos

46. The taking or recording of images should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and wellbeing of pupils. Images should not be kept on private devices but stored appropriately within the school system.
47. There are no circumstances that will justify adults possessing indecent images of children. Accessing, making and storing indecent images of children is illegal. Adults should not use school equipment to access adult pornography; neither should personal equipment containing these images or links to them be brought into school. Staff should ensure that pupils are not exposed to any inappropriate images or web links.

Curriculum

48. Please see Sex and Relationships policy

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Owner: Deputy Head Pastoral DCS

Many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature which can sometimes lead to unplanned discussion about challenging issues. Responding to this type of question or discussion requires careful judgement and staff need to be aware of personal and professional boundaries.

Whistleblowing

49. Please see the Dean Close Foundation Whistleblowing policy

Members of staff have a responsibility to bring matters of concern to the attention of SLT: This can be done in good faith without fear of repercussion.

Sharing concerns and recording incidents

50. All allegations against staff must be taken seriously and properly investigated by a member of SLT or the DSL. Adults who are the subject of allegations are advised to contact their professional association. All members of staff should feel able to discuss difficulties or problems with an appropriate colleague or member of SLT. It is essential that records are maintained when concerns are raised about staff conduct.

Appendix C
Dean Close Pastoral Concerns Form

Use this form to record any concern about a pupil's welfare and/or a Child Protection issue. Once complete, pass this form onto the DSL and/or pastoral member of staff

Date:	Person raising concern:
Name of pupil of concern: House / Form:	
Details of concern raised (include who, what, when and where; the names of witnesses if relevant; details of any immediate action; attach any other relevant documentation):	
Details of conversation (where possible record both the pupil's and your actual words):	

Other people who witnessed or know of the situation:

Follow up action required:

Further action and details:

Resolution of concern:

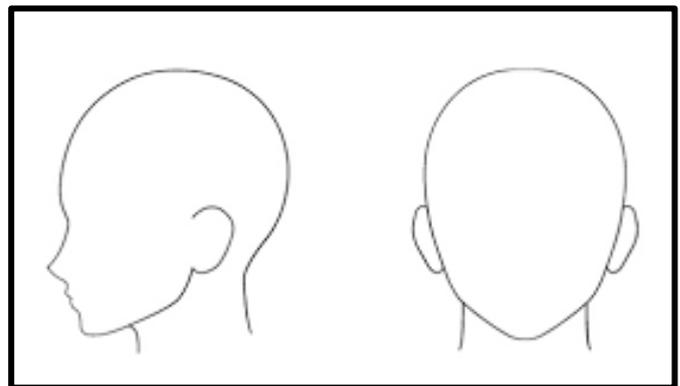
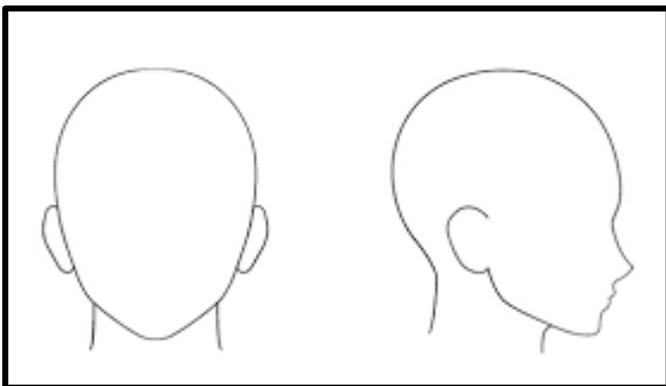
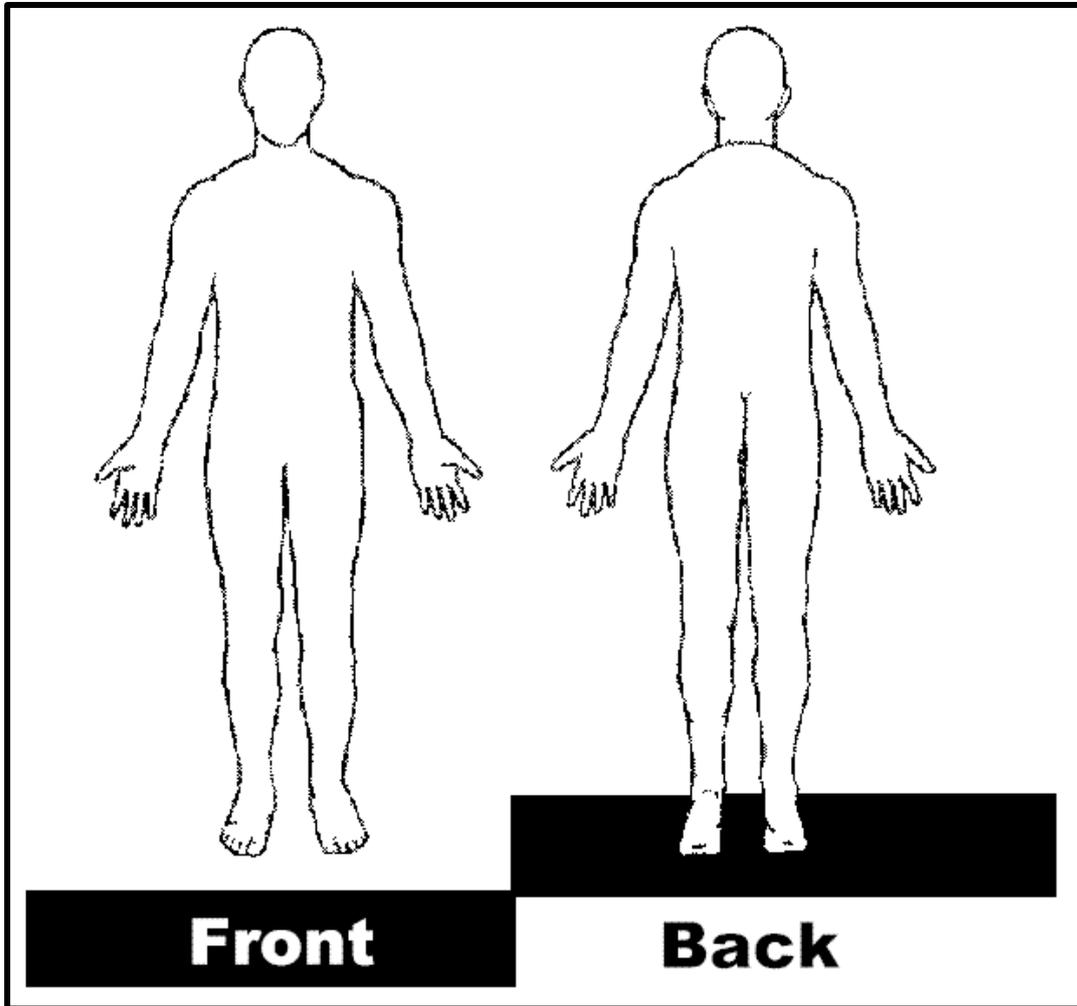
Date	Action	People involved

Documents connected to concern:

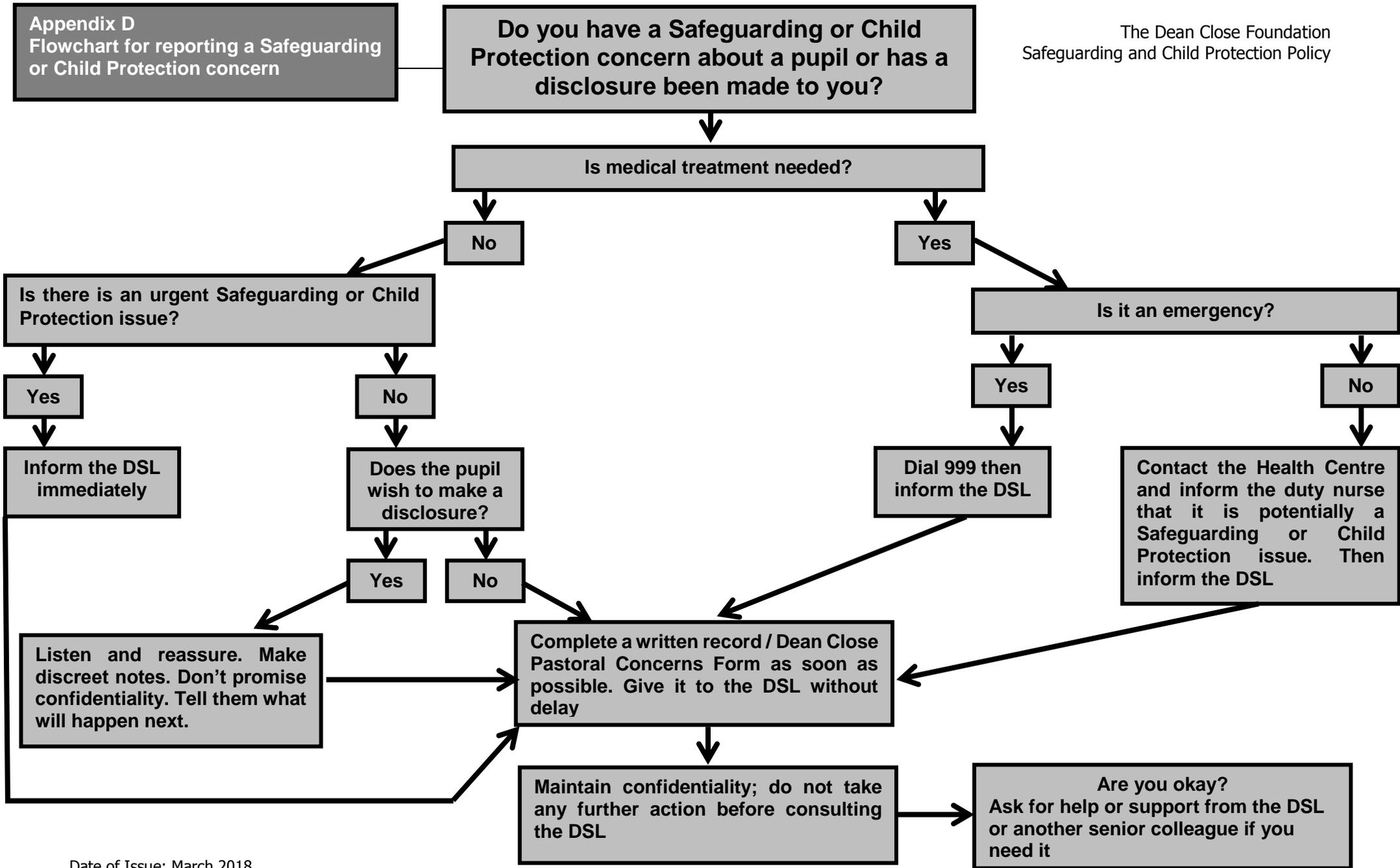
Name	Date	Location

Use and complete the body map if appropriate to record Safeguarding or Child Protection concerns.

DO NOT REMOVE CLOTHING



Appendix D
Flowchart for reporting a Safeguarding or Child Protection concern



Staff/Volunteer Disqualification Declaration

This form is to be completed by all relevant staff and volunteers¹ as part of pre-employment checks. All relevant staff to complete this form annually.

Full Name:

Address:

.....

Please respond to the questions listed below and sign the declaration to confirm that there are no reasons why you should not be working with children. If you are unable to meet any of the following aspects, please disclose this immediately to Head/Bursar. The information contained in this declaration will be held by the School in strictest confidence and used as set out in the School's Recruitment Privacy Notice and Data Protection Policy. Please circle yes or no against each point.

Your personal situation

- | | | |
|---|-----|----|
| <ul style="list-style-type: none"> • Have you been barred from working with children (i.e. does your name appear on the DBS Barring List)? | Yes | No |
| <ul style="list-style-type: none"> • Have you been cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, either at home or abroad? (Please see a list of the relevant offences set out in the Appendix below.) | Yes | No |

Care of Children

- Have your own children been taken into care as a result of the care provided by you?
Yes No
- Have your own children been the subject of a child protection order? Yes No
- Have you had your registration cancelled in relation to childcare or children's homes or have you been disqualified from private fostering? Yes No
- Are you 'Disqualified from Caring for Children'? Yes No

If you have answered 'yes' to any of the above, please provide further information below. This information will be used to determine whether or not you are disqualified from working with children. Please note that when providing further details, you do not need to provide details about any protected cautions or protected convictions. You are also not required to disclose spent cautions or convictions of a person who lives or is employed in your household. Please ask the Bursar for more information.

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Please note: Staff who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. A factsheet explaining the process can be found on this link: <https://www.gov.uk/government/publications/applying-to-waive-disqualification-early-years-and-childcare-providers>. 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 Bursar for more details.

I understand my responsibility to safeguard children, and I am aware that I must notify my manager immediately of anything that may affect my suitability to work with children.

I will ensure that I notify my employer immediately of any convictions, cautions, court orders, reprimands or warnings I may receive.

I understand that you may contact any previous employer, local authority staff, the police, the DBS, or any medical professionals to share information about my suitability to care for children.

SignedDate

For line manager:

I have reviewed the above and confirm that no further action is to be taken.

Line Manager signature Date

OR

I have reviewed the above and the following action has been taken:

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.....

.....

Signed Date action taken

Appendix: List of relevant convictions which can be found here:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/384712/DBS_referrals_guide_-_relevant_offences_v2.4.pdf

Please note that due to changes in legislation, this list may not be exhaustive. If you have any queries or concerns, please contact the Bursar.
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 Owner: Deputy Head Pastoral DCS