



KING WILLIAM'S COLLEGE

King William's College & The Buchan School

Safeguarding and Child Protection Policy

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KING WILLIAM'S COLLEGE
SAFEGUARDING AND CHILD PROTECTION POLICY

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1 INTRODUCTION

- 1.1 King William's College ("the School", which for the purposes of this Policy includes the Buchan School), and its Governing Body is committed to safeguarding and promoting the welfare of children and young people and believes that all pupils, regardless of age, special needs or disability, racial/cultural heritage, religious belief or sexual orientation have the right to be protected from all types of harm and abuse. **Safeguarding and promoting the welfare of children is defined by KCSIE 2018 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 have the best outcomes.** The School expects all Staff to share this commitment and this Safeguarding and Child Protection Policy forms a fundamental part of our approach to providing excellent pastoral care to *all* pupils, including young people who may be over the age of 18 years.
- 1.2 This Policy applies to all permanent and temporary employees of the School (including for this purpose agency staff and self-employed persons who have a contract to provide services to the School) ("Staff"), Governors, and volunteers at the School ("Volunteers"). This Policy applies whenever Staff, Governors, or Volunteers are working with pupils, including where this is away from the School, for example at another institution, on School visits and trips, and whilst attending sporting and cultural activities.
- 1.3 This Policy is published on the School website. A paper copy of this Policy is available to parents upon request to the Principal's Office. All staff receive a "Safeguarding Children Guidelines" card which details good practice.
- 1.4 The School recognizes its duty to protect its pupils (and Staff) from harm, and to co-operate with other agencies in carrying out this duty and will take appropriate action, in cooperation with **Isle of Man Department of Health and Social Care Children and Families team** and the Isle of Man Safeguarding Children Board (SCB) when it suspects that pupils are subject to abuse.
- 1.5 Any allegation or suspicion of abuse arising from within or outside School and relating to or involving pupils, Staff, Governors or Volunteers will be taken seriously and will be referred to the appropriate external agency in accordance with the relevant procedures set out or referred to in the Key Documents (defined below).
- 1.6 The key documents referred to in this Policy (the "Key Documents") are:
- The Children and Young Persons Act 2001
[\[http://isleofmanchildcare.proceduresonline.com/pdfs/ch_act_2001.pdf\]](http://isleofmanchildcare.proceduresonline.com/pdfs/ch_act_2001.pdf)
 - Education Act 2001
[\[https://www.gov.im/media/37969/educationact2001.pdf\]](https://www.gov.im/media/37969/educationact2001.pdf)
 - Education (miscellaneous provisions) Act 2009
[\[https://www.gov.im/media/37973/education_miscellaneous_act.pdf\]](https://www.gov.im/media/37973/education_miscellaneous_act.pdf)
 - **Working Together to Safeguard Children July 2018 (WTSC)**
[\[https://www.gov.uk/government/publications/working-together-to-safeguard-children--2\]](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2)
 - The Isle of Man Safeguarding Children Board (SCB) Inter-Agency Child Protection Procedures (February 2016) [\[http://www.proceduresonline.com/iom/scb/chapters/contents.html\]](http://www.proceduresonline.com/iom/scb/chapters/contents.html)
 - **Keeping Children Safe in Education (KCSIE), statutory guidance for schools and colleges, September 2018.**
[\[https://www.gov.uk/government/publications/keeping-children-safe-in-education--2\]](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)

- Disqualification under the Childcare Act 2006 (June 2016).
[\[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/528473/Disqualification_under_the_childcare_act_June2016.pdf\]](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/528473/Disqualification_under_the_childcare_act_June2016.pdf)
- What to do if you are worried a child is being abused: advice for practitioners (March 2015)
[\[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf\]](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
- Isle of Man Boarding Schools Minimum Standards (April 2017)
[\[https://www.gov.im/media/810174/boarding-schools-minimum-standards-final.pdf\]](https://www.gov.im/media/810174/boarding-schools-minimum-standards-final.pdf)
- Education (Independent Schools Standards)(England) Regulations 2010, as amended 2013
- Teacher Misconduct - Disciplinary procedures for the teaching profession (July 2016)
[\[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/541048/Disciplinary-Procedures_-_updated_July_2016.pdf\]](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/541048/Disciplinary-Procedures_-_updated_July_2016.pdf)
- Mental health and behavior in schools (March 2016)
[\[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf\]](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf)
- DBS Referral Guidance (as may be amended from time to time)
[\[https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs\]](https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs)
- The Prevent duty Departmental advice for schools and childcare providers (June 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf
- Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism (April 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf
- The Use of Social Media for on-line radicalization (July 2015)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social_media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf
- Sexual violence and sexual harassment between children in schools and colleges (May 2018)
[\[https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges\]](https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges)
- Sexting in schools and colleges: Responding to incidents and safeguarding young people (September 2015)
[\[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf\]](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)
- Female Genital Mutilation (FGM)
[\[https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/\]](https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/)

1.7 If a member of Staff, Volunteer or Governor becomes aware of suspected or alleged abuse or any other child protection concerns a report should **always** be made immediately to the Designated Safeguarding Lead [DSL] (**or deputy**). Other members of Staff, Volunteers or Governors should not investigate any suspicions or allegations themselves. The appropriate procedure to follow is set out in more detail in Section 4 of this Policy below.

1.8 Contact information for relevant authorities and for the DSL is contained in Section 12.

2 AIMS

2.1 In implementing this Policy the School aims to:

- create an environment in our School which is safe and secure for all pupils
- educate children about safeguarding through the curriculum and in PSHE lessons, helping children to adjust their behaviour to reduce risk and to build resilience, with particular attention to the safe use of electronic equipment and the internet.
- set out procedures for ensuring that the School meets its responsibilities for safeguarding children from abuse
- protect each pupil from any form of abuse, whether from an adult or another pupil
- protect Staff against untrue or unfounded allegations of abuse
- support a pupil's development in ways that will foster security, confidence and independence
- raise awareness of both teaching and non-teaching Staff of the need for Child Protection and of their responsibilities in identifying and reporting possible cases of abuse
- provide a systematic means of monitoring pupils known or thought to be at risk
- emphasize the need for good levels of communication between all members of Staff
- develop a structured internal procedure to be followed by all members of the School community in cases of alleged or suspected abuse
- promote understanding and build relationships with relevant agencies in order to work together more efficiently.

2.2 Safeguarding covers much more than child protection and so this Policy will operate in conjunction with other related policies and procedures, covering areas such as Anti-Bullying, Behaviour, ICT Acceptable Use, E-safety and Missing Pupils.

3 RESPONSIBILITIES

General

3.1 3.1.1 Every member of Staff, Governor and Volunteer who assists the School is under a general duty to:

- Recognise that safeguarding is the responsibility of everyone
- protect children from abuse;
- **be aware of the School's child protection procedures (including the reading of Keeping Children Safe in Education Part 1 and Annex A [September 2018]) and to follow them;**
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any relevant complaint, conversation or event; and
- **always** report any matters of concern to one of the DSLs; and
- be aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents.
- **Undertake appropriate training including annual refresher training.**
- Take note of regular safeguarding updates from staff meetings and email updates.
- Recognise that anybody can make a referral to Isle of Man Social Services/Safeguarding Children Board. **All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and**

section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

3.1.2 Any child may benefit from early help, but all Staff, Governors and Volunteers should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behavior, including gang involvement and association with organized crime groups;
- is frequently missing/goes missing from care or home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalized or exploited;
- is a privately fostered child;
- is misusing drugs or alcohol;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
- has returned home to their family from care.

The Governing Body

3.2 The Governing Body is accountable for ensuring the School has effective policies and procedures in place which are in accordance with the Key Documents and for monitoring the School's compliance with the requirements of the Key Documents.

3.3 The Governing Body will designate a Governor (the "Designated Governor" for child protection who will oversee the operation of this Policy and the related procedures and champion child protection issues). Contact details for the Designated Governor are set out in Section 12.4.

3.4 The Designated Governor (in liaison with the DSLs) will determine appropriate child protection training for the Governing Body and ensure that this is carried out.

3.5 The Governing Body is responsible for undertaking an annual review of this Policy and the related procedures and of the efficiency with which the duties thereunder have been discharged.

3.6 The Governing Body will receive and consider annually a report from the Principal on safeguarding pupils in the School and will take steps to ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay.

3.7 The Governing Body will ensure that the School:

- has a Safeguarding and Child Protection Policy and procedures in place that are in accordance with the Key Documents, and that the Policy is made available to parents;
- has designated an appropriate senior member of the School's leadership team (the DSL), with appropriate status and authority, to take lead responsibility for dealing with child protection issues,

providing advice and support to other Staff, liaising with the relevant external authorities and working with other agencies;

- follows the procedures laid down in the Policy and in the Key Documents for dealing with allegations of abuse against members of Staff, Governors or Volunteers; and
- remedies any deficiencies or weaknesses in regard to child protection arrangements that are brought to its attention without delay.

3.8 The Governing Body should consider how children may be taught about Safeguarding, including online, through the curriculum and PSHE.

3.9 The Governing Body should also ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are at risk/looked after by a Local Authority. This includes ensuring that staff have the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers and information available to the DSLs.

3.10 The Chairman of the Governing Body is responsible for liaising with the relevant external agencies, as appropriate, in the event of allegations of abuse being made against the Principal.

The Principal

3.11 The Principal will ensure that:

3.11.1 this Policy and related procedures are kept up-to-date, reviewed annually, are implemented and are known to and followed by Staff, Governors and Volunteers;

3.11.2 there are sufficient resources and time allocated to enable the Designated Persons to carry out their functions, including attending meetings with external agencies;

3.11.3 Staff and Volunteers feel able to raise any concern about poor or unsafe practices in accordance with the School's Whistleblowing Policy;

3.11.4 any relevant concerns relating to child protection issues are properly addressed;

3.11.5 Governors and parents are kept informed, as appropriate, of any child protection issues which arise (while having appropriate regard to the need for confidentiality and to handle such issues sensitively);

3.11.6 the School practices safer recruitment in checking the suitability of Staff, Governors and volunteers to work with children and seeks undertakings, as appropriate, from other organisations that they do likewise (see paragraph 6 and Appendix 5 below);

3.11.7 a report is made to the Independent Safeguarding Authority, the Department of Education and Children, and the Department of Social Care as soon as is reasonably practicable and in any event within one month - where the School ceases to use the services of any person, member of Staff or Volunteer because it is considered that the person is unsuitable to work with children – (or would have done so had that person not resigned, retired or ceased for another reason to carry out services for the School which bring him or her into contact with pupils). In such circumstances a review of this Policy will be undertaken and a report made to the Governing Body without delay;

3.11.8 all Staff and Volunteers are alert to signs of abuse and neglect (appropriate to their role) and all Staff and Volunteers know to whom they should report concerns or suspicions.

3.11.9 a report on Safeguarding is made annually to the Governing Body in accordance with paragraph 3.6 above.

The Designated Safeguarding Leads

3.12 The Designated Safeguarding Lead (and any deputies) are most likely to have a complete safeguarding picture. The DSL takes lead responsibility for safeguarding and child protection (including online safety) and is a member of the Senior Leadership Team. Deputies are trained to the same standard and whilst activities can be delegated to the deputies, the lead responsibility is not.

The DSL will:

3.12.1 ensure that this Policy and the related procedures are kept up-to-date, reviewed annually and are implemented and are known to and followed by Staff;

3.12.2 ensure that all Staff receive training in Safeguarding Children as part of their induction and receive updated safeguarding training **annually**;

3.12.3 ensure that all volunteers and temporary Staff who work with children are made aware of this Policy and the School's arrangements for child protection and that such volunteers and temporary staff confirm in writing that this has been done. **The DSL is a source of support, advice and expertise for all staff**;

3.12.4 ensure that all staff, including temporary staff and volunteers receive induction training which includes:

- The School's Safeguarding and Child Protection Policy
- **Behaviour Management Policy**
- **The Staff Code of Conduct**
- **Missing Student Policy**
- Acceptable Use of IT Policy
- **E-safety Policy**
- The identity **and role** of the Designated Persons **(and their deputies)**
- A copy of Part 1 KCSIE and Annex A **(September 2018)**
- Whistleblowing Procedure

3.12.5 inform the Principal, as a first priority, of any allegation or suspicion of abuse involving any pupils, member of Staff, Volunteer or any other person working in the School (in the absence of the Principal the allegation should be notified to the Chairman of the Governors);

3.12.6 ensure information on individual cases is passed only to people who "need to know"; and support Staff involved in reporting child abuse;

3.12.7 keep appropriate secure, clear records;

3.12.8 maintain a confidential risk register for those pupils who are known to be at risk. Names will be entered if it is confirmed by the appropriate external authority that the child is actually at risk.

- A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.
- Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

3.12.9 ensure all relevant child protection records are sent to the receiving school or establishment when a pupil moves schools, ensuring secure transit, and confirmation of receipt should be obtained. This should be transferred separately from the main pupil file;

3.12.10 liaise with other agencies and professionals;

- Refer cases of suspected abuse to the Isle of Man Social care as required;
- Support staff who make referrals to Isle of Man Social Care;
- Refer cases to the Channel programme where there is a radicalization concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required
- Refer cases where a crime may have been committed to the police as required;
- As required, liaise with Social Care in cases which concern a staff member;
- Liaise with staff (especially the pastoral team, medical centre team, IT technicians and SENCO) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral.
- Where children leave the school, the DSL should ensure their children protection file is transferred to the new school or college as soon as possible. Confirmation of receipt should be obtained. This will either be sent via registered mail, or as a password protected email. Sometimes it is appropriate to share information in advance of a child leaving (to ensure that appropriate support is in place).

3.12.11 ensure that either they, the form tutor or other delegated member of Staff, attend relevant external meetings, provide reports as required and otherwise assist and cooperate fully with external authorities;

3.12.12 ensure that any pupil currently on the child protection register who is absent without explanation for two days is referred to their Social Worker;

3.12.13 provide the Safeguarding Committee termly meeting (chaired by the Governor responsible for Safeguarding) a report detailing any changes to the Policy and procedures; in consultation with the Head of Human Resources, a report of training undertaken by the Designated Persons, and by members of Staff;

the number and type of incidents/cases, and the number of children currently on the child protection register (anonymised);

- 3.13 The Designated Persons and their Deputies must undertake the appropriate training in accordance with the Key Documents to include SCB inter-agency child protection training in addition to basic child protection training. They will attend refresher training at least at two yearly intervals (including Prevent awareness training).

They must keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and statutory intervention, including Social Care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review and be able to attend and contribute to these effectively when required to do so;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

- 3.14 Contact details for the DSLs and their deputies are set out in section 12.

4. THE MANAGEMENT OF SAFEGUARDING

4.1 The individual from the Senior Leadership Team of the School who has overall responsibility for Child Protection matters is the Deputy Head Pastoral. The Deputy Head Pastoral will also be the Designated Safeguarding Lead as regards King William's College. Their name and contact details are set out in Section 12 – Key Contacts. For the Buchan School, The Head of Buchan is the Designated Safeguarding Lead and they are also part of the Senior Leadership Team.

4.2 The Designated Governor for Safeguarding and Child Protection will Chair the Safeguarding Committee which will meet at least every term to monitor the School's Safeguarding Policy.

4.3 The members of the Safeguarding Committee will be the The Designated Governor(Chair), Deputy Head Pastoral , The Principal, the Designated Persons, the Bursar and the Designated Member of the Bursarial Staff responsible for the Central Register of Appointments.

- 4.4 The Minutes of the termly Safeguarding Committee meetings will be emailed to the Designated Governor for Safeguarding and Child Protection and will be considered by the Finance and General Purposes Committee of the Governing Body at its termly meeting.
- 4.5 The purpose of the Safeguarding Committee is to monitor and review the safeguarding policy and procedures of the School. In particular, the following areas will be standing agenda items for the Committee:
 - 4.5.1 The Child Protection Training Requirements of the Designated Persons pursuant to paragraph 3.13 of the policy.
 - 4.5.2 The Child Protection Training Requirements of all staff pursuant to paragraph 3.12.2 of the policy.
 - 4.5.3 Safeguarding induction for all new staff.
 - 4.5.4 The pre-employment checks of new staff and volunteers and the proper compilation of the Central Register of employees pursuant to paragraph 7 and Appendix 5 of the policy.
 - 4.5.5 The induction training of all new staff pursuant to paragraph 3.12.4 of this policy.
 - 4.5.6 The confidential list of at risk/'looked after' children (if any) at the school pursuant to paragraph 3.12.8 of the policy.
 - 4.5.7 The staff, skills, knowledge and understanding necessary to keep safe children who are at risk/'looked after' by a Local Authority (see paragraph 3.9 above)
 - 4.5.8 How children at the school may be taught about safeguarding, including online, through the curriculum and PSHE. (see paragraph 3.8 above)
 - 4.5.9 Any specific safeguarding/child protection issues which have warranted contact with external agencies.
 - 4.5.10 Undertakings received from the Buchan Nursery regarding pre-employment checks (see paragraph 7.3 below).
 - 4.5.11 Undertakings received from third parties regarding pre-employment checks (see paragraph 7.4 below).
 - 4.5.12 Arrangements and monitoring as regards any employee awaiting a DBS check who is employed (or is acting as a volunteer) under supervision.
- 4.6 The Minutes of the Safeguarding Committee should be sufficiently detailed to demonstrate the depth of the review.

5. PROCEDURES

- 5.1 **Initial complaint:** A member of Staff, Volunteer or Governor suspecting or hearing a complaint of abuse must:
 - 5.1.2 listen carefully to the pupil and keep an open mind;
 - 5.1.3 not take a decision as to whether or not the abuse has taken place;
 - 5.1.4 not ask leading questions, that is, a question which suggests its own answer;

- 5.1.5 reassure the pupil but not give a guarantee of absolute confidentiality;
 - 5.1.6 explain that they need to pass the information to the appropriate Designated Person who will ensure that the correct action is taken;
 - 5.1.7 keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the DSL as soon as possible.
- 5.2 **Preserving evidence:** All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be passed to and safeguarded and preserved by the DSL.
- 5.3 **Reporting:** All suspicions or complaints of abuse must be reported to the relevant DSL or Deputy DSL, or if the complaint involves the DSL, to the Principal. Details for reporting allegations against members of Staff are given in Appendix 2 below.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

- 5.4 Members of Staff must, as soon as reasonably practicable after making a report, complete the Form "Safeguarding Concern" and pass this to the DSL. Copies of this form are also held on the staff section of 'Firefly' and paper copies are available from the Deputy Head Pastoral.
- 5.5 **Action to be taken by the DSL:**
- 5.5.1 the DSL should discuss all relevant circumstances with the person who has received the initial complaint;
 - 5.5.2 if concerns persist about the welfare of a pupil or pupils it is the duty of the DSL to refer allegations and suspected cases of abuse to Social Services as soon as possible and in any event within 48 hours and in accordance with the SCB procedures.

An Action Flowchart is set out in Appendix 1.

- 5.6 If there is any doubt as to whether a referral should be made, the DSL will consult with the Director of Services for Children at the Department of Education and Children, with the Isle of Man Safeguarding Children Board, or with Social Services on a no names basis without identifying the family. However, as soon as concern exists that a child is at risk of significant harm, a referral will be made without delay (and in any event within 24 hours). If the initial referral is made by telephone, the DSL will confirm the referral in writing within 48 hours using the "Safeguarding Children Board Referral Form to Children and Families" (<http://www.isleofmanscb.im/professionals.html>). If no response or acknowledgment is received within 24 hours, the DSL will contact Social Services again.
- 5.7 The action to be taken once a referral has been made will take into account:
- 5.7.1 the inter-agency procedures of the SCB;

- 5.7.2 the nature and seriousness of the suspicion or complaint;
 - 5.7.3 the wishes of the pupil who has made the complaint, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes;
 - 5.7.4 the wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Person is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose;
 - 5.7.5 duties of confidentiality, so far as applicable.
- 5.8 **Allegations against Staff:** Any allegation of abuse made against a teacher or other member of Staff or volunteer will be taken seriously and will be dealt with fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. These procedures are set out in full in Appendix 2.
- 5.9 A report to a Designated Person should be made if a teacher, volunteer or other member of Staff has:
- 5.9.1 behaved in a way that has harmed a child, or may have harmed a child;
 - 5.9.2 possibly committed a criminal offence against or related to a child;
 - 5.9.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.
- 5.10 **Staff Code of Conduct/Behaviour Policy** is set out in the Common Room Code of Conduct. This is distributed to and read by all current and new employees. The Policy includes guidance for staff to minimize harm to pupils and allegations of harm to pupils.
- 5.11 Safeguarding Children – Staff Guidance: this guidance document sets out the duties and responsibilities of Staff in safeguarding matters. It is set out in Appendix 4 of this Policy and is published in the Staff Section of Firefly.
- 5.12 **Allegations against pupils:** Any allegation of abuse made against a pupil will be taken seriously and will be dealt with fairly, quickly and consistently. The School will take advice from Social Services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. 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 be applied appropriately. 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 Social Services, 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 School will take appropriate measures to support a pupil against whom an allegation has been made. This may involve providing alternative accommodation for the pupil during the investigation.

- 5.13 **Informing parents:** Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with Social Services, the Police and/or the Principal before contacting parents.
- 5.14 **Liaison with Other Agencies:** The School will work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance and written reports at case conferences, core groups and child protection review conferences. **If early help is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to Isle of Man Social Care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.**
- 5.15 **The Child Protection Register:** The School will notify Social Services if a decision is taken to exclude a pupil who is on the child protection register (whether fixed term or permanently)
- 5.16 **Case conferences and strategy/core group meetings:** In each such circumstance the School will assign the appropriate member of Staff to attend a Child Protection Case Conference. Where possible the member of Staff will be accompanied by the Designated Person but this may not always be possible. Staff should prepare a report presenting this to the Case Conference chair at the start of the meeting. The chair will gather all information and assess the risks. Staff will be asked for their view in respect of Child Protection registration. **GDPR does not prevent, or limit, 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 promote the welfare and protect the safety of children.**
- 5.17 If a child's name is placed on the Child Protection Register a Core Group (as defined by the SCB) will be convened. All Core Group members meet with sufficient frequency to facilitate working together and to monitor actions and outcomes as set out in the child protection plan. Attendance at these meetings will be given priority.
- 5.18 The DSL will be available to advise and support Staff involved in Child Protection Register issues.

6 CONFIDENTIALITY & INFORMATION SHARING

- 6.1 The School will keep all child protection records confidential and secure, 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 Social Services and the Police to ensure that all relevant information is shared for the purposes of child protection investigations.

7 PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

- 7.1 The School will operate safe recruitment practices including ensuring appropriate Vetting Checks and reference checks are undertaken in accordance with the Key Documents in order to reduce the risk of children being abused by the School's Governors, Staff or Volunteers.
- 7.2 **There is a separate Recruitment Policy and Appointment procedure available on the School Website.**

- 7.3 The School will obtain undertakings from the Proprietor of the Buchan Nursery that, in respect of the employees of Buchan Nursery and any volunteers, appropriate safer recruitment practice is followed and pre-employment checks made.
- 7.4 The School will obtain undertakings that appropriate child protection checks and procedures apply to staff employed by third parties or other organisations which may have responsibility for pupils (for example, staff employed by outside activity providers) on or off the School site.
- 7.5 The School will ensure that appropriate checks are made of all people who serve as School Governors.
- 7.6 In relation to any UK citizen, the School may refer to the DBS for consideration any unsuitable employee or prospective employee in the light of information arising from the DBS process.

8 EARLY YEARS FOUNDATION SETTING (EYFS)

- 8.1 This Policy applies to the School's provision for the Early Years Foundation Setting ('EYFS'). The identity of and contact details for the Designated Safeguarding Lead/s with lead responsibility for safeguarding within this setting are set out at Section 9.
- 8.2 Use of mobile phones and cameras: everyone who works in Early Years will keep their personal mobile phones locked in staff lockers in the staff room. Only school cameras and school iPad/tablets are to be used in EYFS and these are not to be removed from school. These school devices are locked away overnight. All staff in the EYFS are required to adhere to the ICT Acceptable Use Agreement, and specifically to ensure that any images taken of pupils are appropriate and stored and managed safely.
- 8.3 Parents are made aware of the fact that photographs and video cannot be taken in an EYFS setting. Notices remind parents of this and a reminder of this fact is announced at any school event children involving Early Years.
- 8.4 Safeguarding training for staff in the EYFS will include guidance on identifying signs of possible abuse and neglect (such as significant changes in a pupil's behaviour, deterioration in wellbeing, physical indications, or comments which give cause for concern) and on how to respond in a timely and appropriate way to such signs or to inappropriate behaviour in other members of staff or any other person working with children (Statutory Framework for the EYFS (2014) Section 3.6).
- 8.5 Registration and Inspection (Social Services) will be informed of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere) using the Statutory Notification of Events (within 24 hours of the event occurring). Registration and Inspection will also be informed of the action taken in respect of the allegations using the Statutory Notification of Events form:
(<https://www.gov.uk/media/1350642/2016-notification-of-events-form.pdf>)
- 8.6 The Childcare (Disqualification) Regulations 2009 made under section 75 of the Childcare Act 2006 provides that a person who is disqualified under the 2009 Regulations may not provide relevant childcare provision or be directly concerned in the management of such provision. Regulation 9 of the 2009 Regulations also provides that a person may not be employed to provide early years child care if they live in the same household as someone who has been disqualified. Every member of staff who provides early years childcare at The Buchan School is asked to complete an annual Self Declaration Form. Further information can be found at <http://www.safeguardingschools.co.uk/disqualification-by-association-february-2015/>

9 BOARDING

- 9.1 Within the boarding context, relationships may develop. The School forbids sexual acts between pupils. The School aims to keep such incidents confidential from other pupils, but will refer concerns to Isle of Man Safeguarding Children Board for advice and guidance.
- 9.2 Where there is a suspicion of abuse between pupils, the School recognises the importance of moving swiftly (notwithstanding its duty to refer concerns without delay to Social Services) and the protection of all parties involved. This may require separation and additional supervision. By promoting an open atmosphere of mutual trust within the boarding community; experienced boarding staff and supervision; access to people that can help, including the Independent Listener we hope to minimise the possibility of peer on peer abuse.

10 PEER ON PEER ABUSE

- 10.1 All Staff should recognise that children are capable of abusing their peers and that this can manifest itself in many ways. This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sexting; and initiation/hazing type violence and rituals. It is important to note that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh”, “boys being boys” or “part of growing up”. Although it is more likely that girls will be victims and boys will be perpetrators, all peer on peer abuse is unacceptable and will be taken seriously. Staff should be aware that evidence shows that girls, children with SEND and LGBT children are at greater risk. The School will take advice from Isle of Man Social Care on the investigation of allegations of peer abuse and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse, all of whom are treated as being ‘at risk’. The School will respond on a case-by-case basis and all pupils will be supported. Subject to the advice of Social Care and/or the police, parents will be informed as soon as possible. Staff must challenge behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- 10.2 Following a report of sexual violence or sexual harassment, the DSL (or deputy) will make an immediate risk and needs assessment considering:
- the victim;
 - the alleged perpetrator;
 - all other children (and if appropriate, staff);

The risk assessment will be recorded and kept under review. The DSL will consider the following:

- the wishes of the victim in terms of how they want to proceed;
- the nature of the alleged incident;
- the ages of the children involved;
- the development stages of the children involved;
- any power imbalance between the children;
- is the incident a one off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, or School staff;
- contextual safeguarding issues.

The DSL should engage with social care, the police and specialised services as required, acting in the best interests of the victim and supporting the alleged perpetrator. Management options are:

- The School manages the incident internally;
- Multi-agency early help is provided;
- Referral to Isle of Man Social Care;
- Reporting to the police (in addition to Social Care).

10.3 The Designated Safeguarding Lead will be informed of any bullying incidents when there is a reasonable cause to suspect that a child is suffering or likely to suffer significant harm. A log of bullying concerns, investigations and outcomes is held by the Designated Safeguarding Lead.

10.4 The School has a widely publicised anti-bullying policy which is reviewed on a regular basis. The School also promotes positive behaviour on a daily basis, in addition to taking part in local and national initiatives (Anti-bullying week, Mental Health Awareness days for example).

11 **SEXTING**

11.1 “Youth produced sexual imagery” is a phrase introduced to add clarity to the common term “sexting” and involves the sharing of images between young people that they, or another young person, have created of themselves.

11.2 When an incident involving youth produced sexual imagery is brought to the school’s attention, the school will follow guidance contained within the document “Sexting in schools and colleges: responding to incidents and safeguarding young people” (UKCCIS, September 2016)

11.3 Any incidents should be reported to the Designated Person for Child Protection who will review the information with appropriate school staff and, if appropriate, interview the students involved. The school will establish the facts and assess the risks to help decide whether Children’s Social Care and / or the police should be involved.

11.4 If a student has shared an image consensually, such as when in a romantic relationship, or as a joke and there is no intended malice, it may be appropriate for the school to manage the incident directly. However, a student sharing someone else’s imagery without consent or any incident involving malicious intent will generally be referred to Children’s Social Care and / or the police. The school will, should there be any doubt about whether to refer to other agencies will make a referral to Children’s Social Care and / or the police.

11.5 Adults should not view youth produced sexual imagery unless there is a good and clear reason to do so. The decision to view imagery will be taken by the DSL and/or Head and they should be satisfied that viewing the imagery is:

- is the only way to make a decision about whether to involve other agencies
- is necessary to report the image to a website / app or reporting agency to have it taken down or to support a student in making a report
- unavoidable because a student has presented the image directly to a member of staff or the image has been found on a school device or network

12 KEY CONTACTS

12.1 The Deputy Head Pastoral, being the individual from the SLT with responsibility for child protection matters at King William's College is Stuart Corrie. At The Buchan School, The Head (also a member of SLT) has this responsibility.

12.2 The Designated Persons for Child Protection are:

- Stuart Corrie (Deputy Head Pastoral, KWC) 820435 or email stuart.corrie@kwc.im
- Janet Billingsley Evans (Buchan Head) 820481 or email janet.billingsley@kwc.im
- Gary Peirce (Proprietor of Buchan Nursery) 820497 or email gary.peirce@kwc.im

12.3 The Deputy Designated Persons to contact in their absence are:

- Denise Currie (Head of RS & History, KWC) 820400 or email denise.currie@kwc.im
- Edmund Jeffers (Head of Boarding, KWC) 484798 or email ed.jeffers@kwc.im
- Louise Ashton (Buchan Prep) 820481 or email louise.ashton@kwc.im
- Melissa Hawley (Buchan Pre-Prep) 820481 or email Melissa.hawley@kwc.im
- Lisa Untisz (Manager of Buchan Nursery) 820497 lisa.untisz@kwc.im

12.4 The Designated Governor for Safeguarding and Child Protection is:

- Peter Clucas email: peter.clucas@cains.com

12.5 The Designated Person responsible for the Central Register of Appointments is:

- John Oatts, Bursar email: john.oatts@kwc.im

12.6 External Agencies

Social Services Children & Families Division
2nd Floor
Murray House
Mount Havelock
Douglas
IM1 2SF
01624 682363 or 01624 682369
Duty Social Worker: 01624 686179

Isle of Man Safeguarding Children Board (SCB)
Chief Secretary's Office
Bucks Road
Douglas
IM1 3PN
01624 685707 or email iomscb@gov.im
Disclosure & Barring Service referrals helpline: 01324 953795

Department of Social Care

Registrations & Inspection Unit
Ground Floor,
St George's Court
Hill Street
Douglas
IM1 1EF
01624 642422
Email: randi@gov.im

Director of Services for Children
Department of Education and Children
Hamilton House
Peel Road
Douglas
IM1 5EZ

01624 693833

Prevent Duty

Isle of Man Police Tel 01624 822222

UK Department for Education (Extremism Advice)
Tel: 0207 340 7264
Email: counter.extremism@education.gov.uk

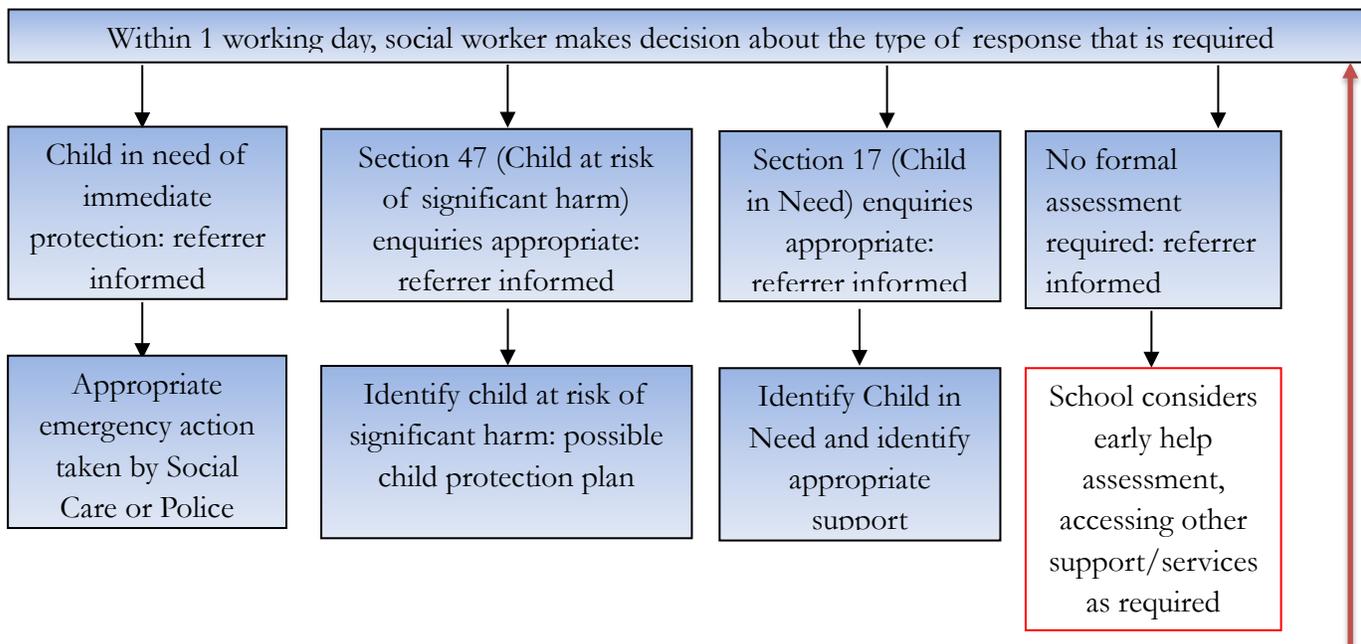
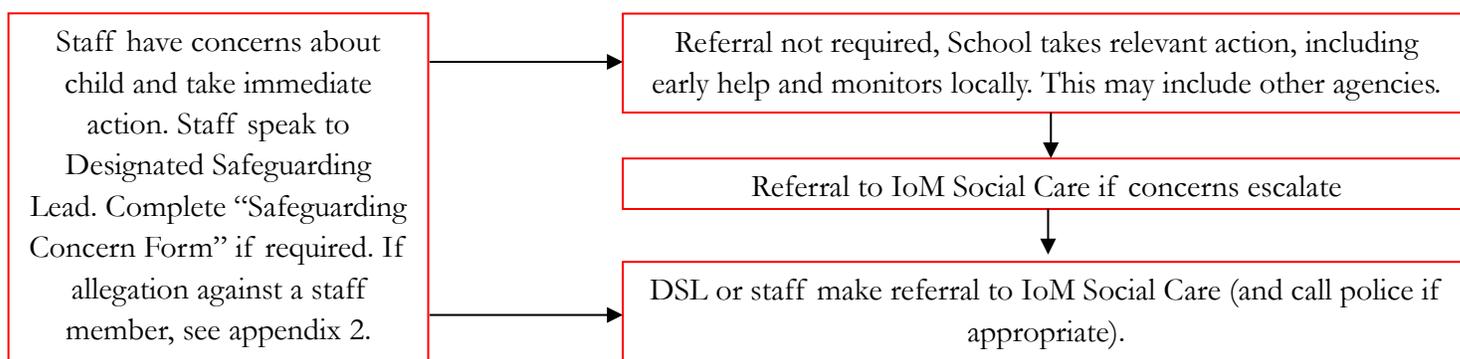
Anti-terrorism helpline Tel: 0800 789 321

Actions where there are concerns about a child (from KCSIE 2018, page 13)

Wherever possible, there should be a conversation with the Designated Safeguarding Lead or deputy who will help decide what to do next. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Isle of Man Duty Social Worker. Share any action with the DSL as soon as possible.

Options include:

- managing any support for the child internally via the School’s own pastoral support processes;
- an early help assessment;
- a referral to Isle of Man Social Care (for example as the child might be in need, is in need or suffering or likely to suffer harm).



At all stages, keep the child’s circumstances under review and re-REFER if appropriate to ensure that the child’s circumstances improve – the child’s best interest must always come first.

Anyone can make a referral direct to Isle of Man Safeguarding Board or Isle of Man Social Services. Parental consent is normally required to make a referral, unless the child is at immediate risk.

ALLEGATIONS AGAINST STAFF (INCLUDING THE DESIGNATED PERSON), VOLUNTEERS OR THE PRINCIPAL.

1. The School has procedures for dealing with allegations against Staff (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 will be used where the member of Staff or volunteer 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; or
 - 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. (The harm test is explained on the Disclosure and Barring service website <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>)

This Policy and the procedures set out within it are non-contractual and do not form part of the terms and conditions of employment of any member of Staff. This procedure relates to members of staff who are currently working in the School regardless of whether the School is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the police. Historical allegations of abuse will also be referred to the police. Where the school has information to indicate that the former staff member is working with children in another location this should also be reported to the LADO in that location and to the senior management of the school where that member of staff is currently working.

If an allegation is made against a member of staff or volunteer, the School's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

The following definitions are to be used when determining the outcome of allegation investigations:

- a) Substantiated: there is sufficient evidence to prove the allegation;
 - b) False: there is sufficient evidence to disprove the allegation;
 - c) Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
 - d) Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
 - e) **Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.**
2. **Allegations against Staff:** Social Services will be informed of all allegations that come to the School's attention and appear to meet the criteria for referral. Where an allegation or complaint is made against the Designated Person or any other member of Staff or a volunteer, the matter should be reported immediately to the

Principal. If the Principal is absent, the allegation should be passed to the Chairman of the Governing Body. Where appropriate, the Principal will consult with the Designated Person or Deputy Designated Person and all allegations will be discussed with Social Services before further action is taken. The nature, content and context of the allegation will be discussed with Social Services and a course of action will be agreed, including any involvement of the police.

3. **Allegations against the Principal or Chairman of the Governing Body:** Where an allegation or complaint is made against the Principal, the person receiving the allegation should immediately inform the Chairman of the Governing Body, or in his absence the Deputy Chairman, without first notifying the Principal. Similarly, if an allegation is made against the Chairman of the Governing Body, the allegation should be reported to the Principal. Again, any such allegations will be discussed with Social Services before further action is taken.
4. **Disclosure of Information:** The Principal will inform the accused person of the allegation if appropriate after Social Services have been consulted. The Parents or carers of the pupil/pupils involved will also be informed of the allegation as soon as possible if appropriate. Where Social Services advises that a strategy discussion is needed, or the police need to be involved, The Principal should 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. The parents or carers should be kept informed of the progress of the case, including the outcome of any disciplinary process. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice. Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.
5. **Support:** A School has a duty of care towards its employees and as such, it will endeavour to ensure that appropriate support is provided for anyone facing an allegation. Individuals should be informed of concerns or allegations as soon as it is appropriate to do so and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed to keep him or her informed of the progress of the case. **The individual will be advised to contact their trade union representative and a colleague for support. They will also be given access to the informal listening service operated by the School.**
6. **Action to be taken against the accused:** Where an investigation by the police or the local authority children's social care services is not deemed by these parties to be necessary, Social Services will discuss the steps to be taken with the Principal (or the Chairman of the Governing Body where the allegation is against the Principal). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further investigation to determine the appropriate action. If so, Social Services will discuss with the Principal how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of Staff, but in some instances it may be appropriate to appoint an independent investigator as advised by the Isle of Man Safeguarding Children Board.

7. **Suspension:** Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- there is cause to suspect a pupil or other pupils at the School is or are at risk of significant harm; or
- the allegation warrants investigation by the police; or
- the allegation is so serious that it might be grounds for dismissal.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The School will give due weight to the views of Isle of Man Social Services when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment to a post that has no contact with students.

8. **Criminal Proceedings:** The School will consult with Social Services following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case.

9. **Return to Work:** If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this, for example, a phased return may be appropriate and/or the provision of a mentor to provide assistance in the short term. The School should also consider how to manage the contact with the pupil/pupils who made the allegation.

10. **Ceasing to use Staff:** If the School ceases to use the services of a member of Staff (or a governor or volunteer) because they are unsuitable to work with children, there will be a prompt and detailed report made to the Disclosure and Barring Service, the Department of Education and Children and the Department of Social Care. The School must not agree to any provision in a Compromise Agreement which could or does restrict or remove its obligation to make such a report. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governing Body without delay. Professional misconduct by teaching staff will be referred to the **TRA**.

NB There is a legal duty to refer to the DBS anyone who has:

1. Engaged in 'relevant conduct':

Relevant conduct in relation to children is conduct which:

- Endangers a child or is likely to endanger a child

- If repeated against or in relation to a child, would endanger a child or would be likely to endanger them
- Involves sexual material relating to children (including possession of such material)
- Involves sexually explicit images depicting violence against a person (including possession of such images), if it appears to DBS that the conduct is inappropriate
- Is of a sexual nature involving a child, if it appears to DBS that the conduct is inappropriate.

A person's conduct endangers a child if they:

- Harm a child,
- Cause a child to be harmed,
- Put a child at risk of harm
- Attempt to harm a child, or
- Incite another to harm a child.
- Satisfied the 'harm test' (i.e. no action or inaction occurred but the present risk that it could was significant), or
- Received a caution or conviction for a 'relevant offence' (a list of these offences is available on the DBS website, or call the helpline for advice).

2. Satisfied the harm test;

There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns which satisfy the harm test. To satisfy the harm test there needs to be credible evidence of a risk of harm to children. For a case to be considered as a risk of harm, there must be tangible evidence rather than a "feeling" that a person represents a risk to children. For example, a teacher who confides in their head teacher that they are sexually attracted to children (but who had not engaged in 'relevant conduct') would satisfy the harm test.

3. Received a caution or conviction for a relevant offence;

and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Referrals should be made as soon as possible after the resignation or removal of the individual.

Failure to make a Referral to the DBS in such circumstances constitutes an offence.

11. **Resignation:** If a member of Staff (or a Governor 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. Resignation will not prevent a prompt and detailed report being made to the Disclosure and Barring Service in appropriate circumstances. **A referral to the TRA will be considered in appropriate circumstances.** The School must not agree to any provision in a Compromise agreement which could or does restrict or remove its obligation to make such a report.

12. **Timescales:** All allegations must be dealt with as a priority so as to avoid any delay. It is expected that most cases of allegations of abuse against Staff will be resolved within one month with exceptional cases being completed within 12 months. If a disciplinary hearing is required and can appropriately be held without further investigation or action on the part of Social Services or other external bodies, it should be held within 15 working days.

13. **Unfounded, false or malicious allegations:** Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's behaviour and discipline Policy.

Where a parent has made a deliberately invented or malicious allegation the Principal 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 Social Services and/or the police to determine whether any action might be appropriate.

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

14. **Record Keeping:** Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal pension age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the School's safer recruitment procedures. In cases where allegations are found to be false, malicious or unsubstantiated, reference will not be made in employer references.

15. **Substantiated Allegations:** in the event of a substantiated allegation against a member of staff, the School should work with Social Services to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

16. **Learning Lessons:** At the conclusion of a case in which an allegation is substantiated, Social Services should review the circumstances of the case with the School to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. Social Services and the School should consider how future investigations of a similar nature could be carried out without suspending the individual.

IDENTIFICATION AND RECOGNITION OF ABUSE – STAFF GUIDANCE

The identification of child abuse is almost always arrived at through piecing together a variety of factors as in a jigsaw puzzle, rather than there being a definite sign, symptom or injury.

It is dangerous to assemble check lists of indicators of abuse in the belief that this will make identification simple and straightforward.

The key is always one of context. For example, the site and type of injury, the age and development stage of the child, how the parent(s) said the injury happened, what the child said and so on. However, if you suspect abuse has occurred you must always do something. You must speak to the Designated Person.

There are some common areas, which may indicate the possibility of abuse. Remember though that they should never be taken on their own as absolute proof that abuse has occurred:

- Does their explanation tally with the injury sustained?
- Did they seek medical help within reasonable time scale?
- Is there a pattern of recurring injuries/problems with the child?
- What is the parents' general attitude towards the child?
- How do they react to you as a professional?

Diagnosing child abuse is not a simple process. We know that child abuse does occur, and we must be willing, indeed have a duty, to take action to protect children from abuse. An awareness of possible indicators of child abuse means that we are more likely to be able to recognize it and help the child.

Sometimes children may present with signs and symptoms of abuse. Other times there will not be obvious indicators.

Some injuries are highly suggestive of abuse:

- Hand-slap marks
- Grip marks, often visible if a child has been shaken and sometimes the only physical indicator of sexual abuse if a child has been forcibly held by the abuser
- Bruising in unusual positions, including the genital area
- Black eyes, often caused by direct blow, although they may occur from an accidental bang on the bridge of the nose or forehead
- Bite marks, often evidence of bruising, and teeth marks
- A torn fraenum (piece of skin which attaches inside upper lip to gum) may be the result of a direct blow or of an object, being forced into the mouth
- Multiple fractures or fractures of varying age
- Poisoning
- Injuries to the genital or rectal area, including unexplained soreness or bleeding, sexually transmitted diseases and pregnancy
- Poor physical care, including inadequate hygiene, inappropriate dress, constant hunger and lack of attention to medical need

- Unexplained failure to thrive

Similarly, children's behaviour may give clues that they are or have been abused. However, it should be remembered that children show signs of distress for other reasons too e.g. divorce of parents, death of a family member.

Again we have to be cautious and remember that child abuse is one possible explanation for observations of behavioural difficulties.

- A fear of adults generally or certain adults in particular
- Poor peer relationships with other children and an inability to make friends
- Aggression
- Social isolation and withdrawal
- Pseudo-maturity
- Frozen awareness (a combination of lack of expression and watchfulness)
- Detachment
- Sleep disturbance
- Running away
- Eating disorders
- Psychological problems
- Psychosomatic complaints (that is, illness caused by hidden fear or anxiety)
- Low attainment or a sudden drop in School performance
- Self destructive behaviour, including substance abuse and suicide

Contact with parents (unless they are suspected of abuse) is an important component of recognizing abuse – their attitudes, responses and explanations must be evaluated as part of the jigsaw of recognition.

Children have the right to be protected from abuse. This applies regardless of parental circumstances and any sympathy one feels for the parents concerned.

PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy, Munchausen's syndrome by proxy, now referred to as Fabricated Induced Illness (FII).

Types of Abuse

KCSIE identifies types of abuse and neglect as follows:

1. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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.
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.
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.
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.

Specific safeguarding issues

1. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES website (www.tes.co.uk), MindEd website (www.minded.org.uk) and also on the NSPCC website www.nspcc.org.uk
2. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:
 - Bullying including cyberbullying
 - Children missing education
 - Children missing from home or care
 - child sexual exploitation (CSE) – see also below
 - domestic violence
 - drugs

- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – see also below
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- private fostering
- preventing radicalisation
- sexting
- teenage relationship abuse
- trafficking

Further information on 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.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- 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; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse.

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. Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;

- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Female Genital Mutilation

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff **must** activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police.

Child criminal exploitation: county lines

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

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Further information on Preventing Radicalisation

Extremism goes beyond terrorism and is defined in the UK Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Calls for the death of members of the armed forces is also classed as extremism. Extremists often target the vulnerable – including the young – by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

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

Prevent

From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard¹² to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ("the Prevent guidance"). Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools (but also cover childcare). It is anticipated that the duty will come into force for sixth form colleges and FE colleges early in the autumn.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Children Boards (LSCBs).
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally.

The Department for Education has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

Channel

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

Missing Children

Should a child go missing or be unaccounted for, the Missing Student Policy will come into effect.

A child missing education is a potential indicator of abuse. The School will liaise with the Local Authority (Isle of Man Safeguarding Children Board and Isle of Man Social Services) for children that go missing from education for 10 or more school days without permission or 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 the future.

SAFEGUARDING CHILDREN: STAFF GUIDANCE

This guidance is intended to supplement the School Safeguarding and Child Protection Policy which all staff must adhere to. It provides detailed guidance on how to behave and what to do if a pupil discloses information to you that may be of a safeguarding nature. This guidance also contains guidance intended to raise awareness on how to protect yourself so that your behavior or actions do not place pupils or yourself at risk of harm or of allegations of harm.

Responding to a pupil disclosing information to a member of Staff

The Deputy Head Pastoral (KWC), the Head (Buchan) and Head of Nursery (Nursery) are the Designated Persons dealing with child protection. In liaison with the they will co-ordinate action within School.

The School's role is to **identify** abuse, not to investigate. The Designated Persons should be guided by Social Services.

If any form of abuse is suspected, you are under a duty to report it to the Designated Person in the School.

Receive

- listen to the pupil and take what they say seriously
- allow the pace of the conversation to be dictated by the pupil
- ask neutral questions which encourage the pupil to talk such as "can you tell me what happened?"
- accept what the pupil says and do not ask for further detail
- note carefully any clearly visible external signs of possible injury or neglect
- if you are shocked by what the pupil tells you, try not to show it
- get advice from the Designated Person if you are not sure what to do

Reassure

- If a pupil says that they want to discuss something privately with you, be alert to the fact that something of a sensitive nature may follow. If the pupil asks for confidential advice or asks "if you can keep a secret" you should make it clear there may be a limit to what secrets can be kept. If you become aware that a disclosure is about to be made that would have to be passed on, stop the pupil and inform the pupil that you may have to pass on the information. On no account should you promise confidentiality which may have to be broken. Say to the pupil "some things are so important I might have to tell them to someone else". Staff must tell the pupil sensitively that they have a responsibility to tell the named Designated Person so that the child can be helped to stay safe and feel better
- In every case, the staff/volunteer should consider whether the pupil is able to provide consent for the information to be shared and if so, seek to obtain that consent. If the pupil does not consent, the staff/volunteer should explain that they need to share the information with the Designated Person and reassure them that the information will *only be disclosed* to other people who *need to know*
- The School recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm
- If a pupil has approached you, don't immediately refer them to the Designated Person (they have selected you to speak to in the first place). You must at least arrange a carefully-handled changeover of contact point, which

the pupil is comfortable with. Always discuss the changeover with the pupil. The pupil should feel supported in this process. The aim is for us to act as responsibly and caringly as possible at all times

- If a disclosure of abuse is made remain calm and explain that the information must be passed on
- Offer encouragement and support that the pupil has done the right thing in reporting the problem
- Be honest
- Empathise with the pupil
- Try to alleviate any feelings of guilt the pupil may show
- Acknowledge how hard it must have been for the pupil to tell you
- Reassure the pupil that they have done the right thing, explain whom you will have to tell (the Designated Person) and why

React

- Explain what you have to do next, and to whom you have to talk
- Inform the Designated Person

How not to react

Do NOT

- offer confidentiality
- burden the pupil with guilt by asking questions such as “why didn’t you tell me before?”
- interrogate the pupil for full details. Cases of abuse may need further investigation. It is better for the pupil if they do not have to repeat details unnecessarily.
- suggest alternative explanations for their worries - listen to the pupil's account
- give your interpretations or assumptions
- criticise the alleged perpetrator
- ask the pupil to repeat everything to another member of staff
- ask any potentially leading questions such as those that start with the words: how, what, when, where and why as this could later be interpreted as putting ideas into the pupil’s mind. Limit any questioning to the minimum necessary for clarification. Never attempt to cross – examine or press for evidence.
- undress the child or examine clothed parts of the child’s body in an attempt to determine the nature of any such injuries/neglect
- make promises you cannot keep such as “I’ll stay with you all the time” or “It will be alright now”

Record

- make brief notes at the time or immediately afterwards which record the date, time, place and context of the disclosure or concern, and what has actually been said, not assumption or interpretation. Notes must be signed and dated
- clearly distinguish between fact, observation, allegation and opinion
- note the non-verbal behaviour and the key words in the language used by the pupil (do not translate into “proper terms”)
- complete a Safeguarding Concern Form (available on Firefly Staff Page or directly from Designated Person), attach the original notes and pass them to the Designated Person. This will give a written record of any allegations made, including the date, time and place where such allegation was made and the identity of the person making it and of the observations made by the pupil, and other relevant circumstances
- provide a labeled diagram to indicate position of any bruising

- appreciate that your records may be used in criminal proceedings or disciplinary investigations.
- do not destroy your original notes, in case a court requires them
- there are no data protection concerns regarding this information, as it is a child protection issue
- the information should be stored by the Designated Person, away from the pupil's file (as parents have no right to see this information), but there should be a cross reference made in their file
- similarly, any unproven allegations against staff should be kept as a matter of record, but not in the staff member's personnel file; the information should be kept elsewhere confidentially by the School
- some disclosures will require no further action, however, there may be incidents that will need to be reported to external agencies.
- It is important to remember that you are not expected to be a therapist. However, if a pupil has chosen to speak with you, you have already helped and it is important that procedures are followed.
- If you do not wish to speak with the pupil personally, notify the Designated Person immediately
- act with the utmost discretion. An allegation mistakenly made, whether or not for frivolous or malicious reasons, can have very serious consequences for the person against whom the accusations have been made. Equally, a genuine complaint swept aside can be damaging to the child

Support

- Continue to support the pupil, provide time and a safe space throughout the investigation, and afterwards
- Get some support yourself, **without disclosing confidential information about the pupil**. Receiving a disclosure can be an emotionally challenging experience and can also be traumatic, so find someone to talk to or a quiet place to regroup
- The School will provide continuing support to a pupil who has disclosed abuse through promoting a caring and safe environment within the School and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the School will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised

Staff who have been involved will be provided with support, if needed.

Reporting to the Designated Person

Any concerns about pupils must be discussed with the Designated Person as soon as possible and at latest by the end of the School day.

Where the disclosure relates to actual abuse or the suspicion of abuse, the Designated Person will report the disclosure to Social Services within 24 hours.

- **Suspicion of abuse** If you have any suspicion of abuse please document evidence on the Disclosure Form and notify the Designated Person immediately.
- **Further Action** Once the matter has been reported, the Designated Person will coordinate the procedure for dealing with suspected abuse. The Designated Person will liaise with the Principal in deciding further action, with Social Services being contacted as necessary.

CROSS REFERENCE WITH ISI HANDBOOK FOR THE INSPECTION OF BRITISH INTERNATIONAL SCHOOLS – THE STANDARDS REQUIREMENTS

Part 3 The Welfare, Health and Safety of the pupils

Standard 3.2: Has the School prepared and implemented effective written policies to safeguard and protect the welfare of children who are pupils at the School?

Does the policy meet the following criteria?	Yes	No	Office comment
It is on the website (Part 6)	x		Yes
It contains a general statement of the school's commitment to safeguarding.	x		1.1
It is based on and expressly refers to the most up to date statutory guidance - KCSIE 2018 - WT 2018 - [Prevent 2015 – recommended]	x		1.6
It names the LSCB/local safeguarding partnership and shows that the school will operate safeguarding procedures in line with locally-agreed inter-agency procedures.	x		12.6 1.4 & 5.14
It names a DSL and provides sufficient cover for this role, including in the EYFS, (eg usually one or more named deputies).	x		12.1 – 12.5
The DSL - is a member of the school's senior leadership team or equivalent position of status and authority - JD includes on-line safety (Follow up on site if this is not clear on the face of the policy.)	x		12.1 3.12
It describes how proprietors ensure they maintain proper oversight of safeguarding - It names a board level lead/designated governor for safeguarding (if applicable) - The policy is updated annually (and is therefore dated within the last year) - Out of date references for removal eg List 99, CRB, ISA (Recommended) - Wider processes for proprietorial oversight are mentioned (classically an annual review)	x		12.4 Front cover 3.5
It covers training for - staff (induction and regular updates, in line with LSCB advice to include Prevent and on-line safety, plus informal updates) - the DSL and deputies (2 yearly inter-agency working	x		3.12.2 3.12.4 3.13 Recruitment policy

<p>plus informal updates)</p> <ul style="list-style-type: none"> - Part 1 KCSIE should be read by all staff, Annex A by school leaders and those who work directly with children - All staff should be trained to manage a report of child on child sexual violence and sexual harassment (permissible not to be included in policy but should be done in practice) <p><i>Note: Safeguarding induction contents should cover (* give copies)</i></p> <ul style="list-style-type: none"> • Safeguarding and CP* • Online safety • <i>school policy – role and identity of DSL and deputies, *</i> • <i>KCSIE part one (all staff)*,</i> • <i>KCSIE Annex A (leaders and those who work directly with children)</i> • <i>Pupil behaviour policy</i> • <i>Safeguarding response to children who go missing from education (CME policy)*</i> • <i>Staff code of conduct* (including whistleblowing and acceptable use of IT, staff/pupil relationships and comms including use of social media). If not mentioned, check practice.</i> 			
<p>It outlines or confirms that the school makes provision for teaching children to keep themselves safe, including on-line.</p>	x		2.2
<p>It sets out types and signs of abuse and neglect in line with KCSIE</p> <ul style="list-style-type: none"> - Specific changes in 2018: <ul style="list-style-type: none"> o Abuse can take place wholly online or tech. may be used to facilitate offline abuse. o Sex abuse of children by children - Ensure sufficient consideration has been given to the list of specific safeguarding issues as listed on Annex A of KCSIE (2018) - physical, emotional, sexual, neglect - <u>cme (children missing education)</u>, radicalisation - domestic abuse (DA), gangs, CSE (child sexual exploitation), FGM, so-called honour-based violence (HBV), forced marriage, - as appropriate - Recognition of vulnerability of children with SEN/D including to peer on peer abuse 	x		<p>Appendix 3 2.2 ref to E-safety, Anti-bullying, ICT AUP and Missing Student Procedure Section 10</p>
<p>It outlines response to peer on peer abuse</p> <ul style="list-style-type: none"> - Procedures to minimise the risk of peer on peer abuse - How allegations of peer on peer abuse will be recorded, investigated and dealt with 	x		Section 10

<ul style="list-style-type: none"> - Victim and perpetrator support - Statement that abuse is abuse and should never be tolerated or passed off as 'banter' or 'Just having a laugh' or 'part of growing up' - Recognition of the gendered nature of peer on peer abuse but that all peer on peer abuse is unacceptable and will be taken seriously - The different forms peer on peer abuse can take, such as: Sexual violence and sexual harassment; Physical abuse; Sexting; Initiation/hazing type violence and rituals. 			
<p>It guides staff how to respond to and report concerns about children in need or at risk, in line with WT:</p> <ul style="list-style-type: none"> - Concerns/Child in need > act immediately > DSL> early help/pastoral support/children's social care, as appropriate - Child at risk > DSL> children's social care/police if crime committed - immediately/24 hours/one working day OR referral can be made direct - Be clear anybody can make a referral Does not require parental consent for referrals to statutory agencies. 	x		Appendix 1
<p>It contains a clear, correct referral process for allegations against staff (including the DSL), volunteers, the head:</p> <ul style="list-style-type: none"> - Staff, DSL, vols > Head>LADO - Head> Chair/safeguarding gov> LADO (without informing Head) OR Sole prop Head > LADO direct - Person dismissed/removed (or would have been) > DBS - Professional misconduct > TRA <p><i>Notes: The school may hold separate procedures for dealing with allegations so they may not be set out in full, but the safeguarding policy should at least refer to them and set out the above.</i></p> <p><i>There should be no suggestion that the school would investigate before referral to LADO</i></p>	x		5.8 and Appendix 2
<p>It sets out or refers to a staff code of conduct.</p>	x		Linked Policy – Staff Code of Conduct
<p>It sets out or refers to a recruitment procedure.</p>	x		Linked Policy – Recruitment Policy and Appointments Procedure
<p>RECOMMENDED: It sets out or refers to a policy on the use of mobile technology eg management of access to 3G/4G.</p>	x		Linked Policy – E Safety Policy and Mobile Phone Policy
<p>It provides sufficient contact details to make the policy operational in practice.</p>	x		Section 12
<p>It covers any other matters of significance to the</p>			

particular school.			
EYFS: It sets out restrictions for the use of mobile phones and cameras in the EY setting	x		8.2 8.3
EYFS registered setting: It references the need to inform Ofsted of allegations against people living or working at the premises, or of any other abuse alleged to have taken place on the premises - as soon as practicable and within 14 days at latest.	x		8.5

Linked Policies:

This policy should be read in conjunction with the following School policies. These can be found on the College website or are available on request from the Principal's Office:

Alcohol, Tobacco and Drugs Policy
Anti-Bullying policy
Acceptable Use Policies for Students and Staff
Attendance and Registration Policy
Complaints Procedure
Complaints Procedure for Students
Data Protection Policy or Pupils, Parents and Staff
Employee Handbook
Equal Opportunities Policy
E-Safety Policy
Induction of New Staff in Safeguarding Children
Missing Student Policy
Mobile Phone Policy
Recruitment Policy and Appointments Procedure
Restraint Policy
Search and Confiscation Policy
Social Media Policy
Staff Code of Conduct
Supervision of Ancillary, Contract and 'Unchecked' Staff Policy
Whistleblowing Policy