

Safeguarding and Child Protection Policy



Updated:	November 2018
Review:	June 2019 or as necessary
Responsible Member of Staff:	Jonny Timms, Designated Safeguarding Lead (Deputy Head - Pastoral)
Responsible Governor:	Liz Hungin

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Contact Details for Safeguarding Team

Mr Jonny Timms, Designated Safeguarding Lead

Direct Line: 01753 649310 / Mobile 07590 624856

JT@caldicott.com

Mr Jeremy Banks, Headmaster

Direct Line : 01753 649301

HM@caldicott.com

Ms Katy Rule, Deputy Designated Safeguarding Lead

Direct Line: 01753 649300

KYR@caldicott.com

Ms Sarah Bisschop, Additional Designated Safeguarding Lead

Direct Line: 01753 649314

SJB@caldicott.com

Mr Tom Hollyer, Additional Designated Safeguarding Lead

Direct Line: 01753 649314

TCH@caldicott.com

Ms Sam Broughton, Additional Designated Safeguarding Lead

Direct Line: 01753 649300

s.j.broughton@caldicott.com

Mrs Liz Hungin, Governor responsible for Safeguarding

Direct Line: 01494 681187

e.a.hungin@caldicott.com

Designated Safeguarding Leads (abbreviations to be applied throughout the document)

“Designated Safeguarding Lead”	-	shall be referred thereafter as “DSL”
“Deputy Designated Safeguarding Lead”	-	shall be referred thereafter as “DDSL”
“Additional Designated Safeguarding Lead”	-	shall be referred thereafter as “ADSL”
“The Local Authority Designated Officer “	-	shall be referred thereafter as “LADO”

Summary Statement of Policy: Caldicott is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Links to other policies: This policy should be read in conjunction with the school’s Behaviour, Anti-bullying, SEN, Equalities, E-safety, Medical, Use of Physical Restraint Policies and KCSIE.

1. Introduction

1.1 The policy is reviewed as necessary and is ratified annually at the Governors' meeting in November and this is recorded in the minutes.

1.2 The school is committed to safer recruitment in education. (see the Safer Recruitment Policy, January 2018)

1.3 This policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of pupils at the school, and have been prepared in compliance with, and with regards to:

Reference Document	Source
<ul style="list-style-type: none"> The Children Acts 1989 and 2004 	Legislation.gov.uk
<ul style="list-style-type: none"> Education Regulations 2016 Independent Schools Standards (5th January 2015) 	Legislation.gov.uk DfE
<ul style="list-style-type: none"> Safeguarding Vulnerable Groups Act 2006 	Legislation.gov.uk
<ul style="list-style-type: none"> The Protection of Freedoms Act 2012 	Legislation.gov.uk
<ul style="list-style-type: none"> The Education Act 2002 	Legislation.gov.uk
<ul style="list-style-type: none"> Serious Crimes Act 2015 	Legislation.gov.uk
<ul style="list-style-type: none"> <i>What to do if you are worried a Child is being Abused</i> March 2015 	Department for Education (hereafter "DfE")
<ul style="list-style-type: none"> <i>Working Together to Safeguard Children</i> 2018 (A guide to inter-agency working to safeguard and promote the welfare of children) 	DfE
<ul style="list-style-type: none"> <i>Keeping Children Safe in Education</i> September 2018 	DfE
<ul style="list-style-type: none"> <i>Information Sharing: advice for practitioners providing safeguarding services childcare</i> 2018 	DfE
<ul style="list-style-type: none"> DBS Barring Referral Guidance – updated 12 May 2016 	Disclosure and Barring Service (hereafter "DBS")
<ul style="list-style-type: none"> <i>Independent Schools Inspectorate Handbook</i> 2016 – the regulatory requirements (and as amended) <i>Integrated Handbook – Framework</i> 2016 	Independent Schools Inspectorate (hereafter "ISI")
<ul style="list-style-type: none"> <i>National Minimum Standards for Boarding Schools</i>, April 2015 	DfE
<ul style="list-style-type: none"> <i>Teacher misconduct: regulating the teaching profession</i> Updated 27 July 2016 (and related guidance) 	DfE National College for Teaching and Leadership (part of DfE)

• <i>Use of Reasonable Force in Schools</i> 2013	DfE
• <i>Information Commissioner's Office Data Sharing Code of Practice</i> May 2011	Information Commissioners Office (hereafter "ICO")
• <i>Preventing and Tackling Bullying</i> October 2014	DfE
• <i>Prevent Duty Guidance, Channel Guidance, and Prevent Departmental Advice</i> (June 2015).	DfE
• <i>Sexual Violence and Harassment (May, 2018)</i>	DfE

4.1 It is the responsibility of all members of staff*, teaching and non-teaching, to play an active role in ensuring that children who have specific needs e.g. those suffering from issues such as eating disorders, mental health, and body image and self-harm are supported along with those children who are at risk of harm or are suffering significant harm. The DSL (or in their absence, the DDSL or ADSLs) will contact Social Services for support in all of these areas.

4.1.1 *Wherever the word "staff" is used, it covers ALL staff, including ancillary, supply and self-employed staff, contractors, volunteers working with children etc.

4.2 The governing body takes seriously its responsibility under section 157 of the *Education Act* (2002) to safeguard and promote the welfare of pupils; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering from harm.

4.3 All members of staff are expected to be aware of and follow the school Safeguarding and Child Protection procedures which follow South Bucks Child Protection and Safeguarding Procedures. The procedures have been updated to comply with 'Working Together to Safeguard Children' (2018).

4.4 In particular, staff need to be aware of their duty to report concerns, the guidance for identifying child abuse, what to do if a child makes an allegation of child abuse and issues around confidentiality.

4.5 Generally speaking it is the DSL who consults with local authorities and other outside agencies about pupils who are at risk or in need. However, anyone can make a referral. Contact details are shown in Section 7 of this policy, or, to find a phone number, one can enter a postcode on this website: <https://www.gov.uk/report-child-abuse-to-local-council>

A member of school staff has a responsibility (under the government's directions) to take action if he or she has concerns about the safety or welfare of a child and feels they are not being acted upon by the school.

4.6 Deficiencies: the Headmaster, staff and all adults should be aware that although this document is on an annual review cycle, interim amendments may occur and any

deficiencies immediately rectified. In these circumstances, you will be notified and will be required to read and be familiar with the amended document.

- 4.7 A copy of this policy is available on the school's website. This policy links with the school's Behaviour and Anti-bullying policies as well as the policy on "images of pupils for record keeping and promotional purposes" (see Appendix 1) and Prevent policy (see Appendix 2).

The aims of the school policy are:

- 4.7.1 To support the child's development in ways that will foster security, confidence and independence. The policy endeavours to keep the child's best interest at the forefront of all practice.
- 4.7.2 To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to, approach adults if they are in difficulties, believing they will be effectively listened to.
- 4.7.3 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- 4.7.4 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children. The policy and its procedures aim to highlight the value and importance of early intervention wherever possible.
- 4.7.5 To emphasise the need for good levels of communication between all members of staff.
- 4.7.6 To develop a structured procedure within the school, this will be followed by all members of the school community in cases of suspected abuse.
- 4.7.7 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- 4.7.8 To provide good lines of communication with trusted adults, supported friends and an ethos of protection.
- 4.7.9 To recognise and protect our children who may be vulnerable to radicalisation or exposed to extremist views.

2. Safe School, Safe Staff

2.1 We will ensure that:

2.1.1 All members of the governing body understand and fulfil their responsibilities. There is a designated Governor responsible for overseeing safeguarding. The governing body annually review the school's policies and procedures and the efficiency with which the related duties have been discharged.

2.1.2 The Governors will sign off this policy on an annual basis.

2.1.3 We have a Designated Safeguarding Lead (DSL) and a deputy (DDSL), all of whom have undertaken the necessary Safeguarding Training and who undertake to update their training at least every 2 years.

2.1.4 The Headmaster and all other staff and governors, have child protection awareness training, to be arranged by the DSL on a regular basis, in line with the advice of the BSCB (Bucks Safeguarding Children Board), to maintain their understanding of safeguarding issues, including the signs and indicators of abuse.

2.1.5 All members of staff, volunteers, and governors are provided with child protection awareness training at induction. They know how to respond to a pupil who discloses abuse and who to discuss a concern with.

2.1.6 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Safeguarding Policy.

2.1.7 We will seek to ensure that in line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2018), all staff working within our school have been checked as to their suitability to work with children by adhering to statutory responsibilities to undertake checks on all staff, including verification of their identity, qualifications, a satisfactory Enhanced DBS check and Barred List check (where appropriate), as well as taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Those undertaking management posts will be subject to prohibition from management of independent schools checks. When 'homestays' are arranged in the UK, parents (and others over 18) hosting children will be subject to an enhanced DBS and a barred list check (See external visits policy).

New and existing staff who are employed or provide childcare in "later years", i.e. under the age of 8 are covered by the guidance relating to Disqualification by Association, covered

by Disqualification under the Childcare Act 2006 (as amended, 2018). The guidance is that such staff are disqualified from working in a school when they “live or work in the same household” as someone who is barred from working with children or young people, even if they would not otherwise be disqualified themselves.

Disqualification means where the person is either on the Children’s Barred List, or has:-

- Been cautioned for or convicted of certain violent and sexual criminal offences against children and adults;
- Had certain care orders made relating to the care of children;
- Had registration refused or cancelled in relation to childcare or children’s homes or being disqualified from private fostering.

The regulations apply to all staff in schools who work in early years provision and childcare provision such as breakfast clubs and after school care and clubs for children up to the age of eight.

These staff are required to volunteer relevant information if they learn that someone they live or work with has received any convictions or cautions or certain violent and sexual criminal offences against children and adults or has been disqualified under the 2018 Childcare Disqualification Regulations. If such a declaration is made then the DSL will meet with you to obtain further details.

The DSL will then undertake an immediate risk assessment, taking any necessary steps to limit or supervise contact with children as appropriate. They will then contact the Ofsted helpline, advise that a risk assessment has taken place, and ask for advice.

Waiver of disqualification

When the school becomes aware that a member of staff meets the disqualification criteria, the implications will be explained and the individual will be advised that they can apply to Ofsted for a waiver of disqualification. In this circumstance the school is required to:

- Ask new staff (full, part-time, self-employed and unsupervised volunteers) to complete and sign a declaration confirming that they do not meet the “disqualification/disqualification by association” criteria.
- Ask existing staff to complete and sign a Declaration that they do not meet the “disqualification by association criteria”.

- Record, on the Single Central Register, that a self-declaration form has been completed (but not the result of the yes/no Declaration).
- Obtain further information and undertake an immediate risk assessment on any member of staff who provides a positive response to the declaration question.
- Inform Ofsted of any individuals meeting the disqualification or “by association” criteria within 14 days.

2.1.8 A single central record of appointments is kept for audit. We operate safe recruitment procedures in compliance with Independent School Standards Regulations and this is reflected in the School’s Recruitment Policy.

2.1.9 We will seek assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school’s pupils on another site.

2.1.10 We will ensure that all child protection concerns or allegations against adults working in school are referred to the LADO (Local Authority Designated Officer) for advice.

2.2 Our procedures will be annually reviewed and up-dated. Any deficiencies or weaknesses in the procedures will be remedied without delay.

2.3 The name of the Designated Safeguarding Lead and their deputy will be clearly publicised in the school, with a statement explaining the school’s role in referring and monitoring cases of suspected abuse.

2.4 All new members of staff will be given a copy of our Safeguarding and Child Protection Induction pack which includes the Safeguarding Policy, the Code of Conduct, the Whistleblowing Policy and Part 1 and Annex A of the latest version of Keeping Children Safe in Education. It also has the DSL’s and DDSL’s names clearly displayed, as part of their induction into the school.

2.5 The DSL produces an annual safeguarding report for the governors demonstrating how Caldicott is meeting its statutory responsibilities for safeguarding. This report will be shared with ESAS.

2.6 This policy is available publicly on the school’s website.

3. Responsibilities

3.1 The following staff form the Safeguarding team at Caldicott and have special responsibility for Safeguarding and Child Protection matters:

Mr Jonny Timms	Designated Safeguarding Lead
Mr Jeremy Banks	Headmaster
Katy Rule	Deputy Designated Safeguarding Lead
Ms Sarah Bisschop	Additional Designated Safeguarding Lead
Mr Tom Hollyer	Additional Designated Safeguarding Lead
Ms Sam Broughton	Additional Designated Safeguarding Lead
Mrs Liz Hungin	Governor responsible for Safeguarding

3.2 According to statutory guidance (KCSIE, September 2018) the Governors have appointed the Deputy Head (Pastoral), Jonny Timms, to take responsibility for Safeguarding and Child Protection. The Deputy Head (Pastoral), Jonny Timms, has the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. Katy Rule (Head of 1st Form) is the Deputy DSL. The role of DSL and DDSL is included in their job descriptions.

3.2 The Designated Safeguarding Lead is responsible for:

3.2.1 Procedure:

- a) Holding and being conversant with current local and national Safeguarding and Child Protection procedures.
- b) Keeping up to date through training. It is a requirement that this takes place at least every two years.
- c) Reviewing and updating the school's Safeguarding and Child Protection policies and inter agency working. Any deficiencies or weaknesses in the policies and procedures must be remedied without delay.
- d) Liaison over safeguarding matters with the local Children's Social Care Services.

3.2.2 Raising Awareness

The DSL should create a culture of safeguarding and vigilance within the school and ensure the School's policies are known and used appropriately.

a) Ensure the School's Safeguarding and Child Protection Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governors regarding this.

b) Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.

c) Link with the Bucks Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

d) Where children leave the School, ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

e) Providing, with the Headmaster and the Safeguarding Governor, an annual report for the governing body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of children with child protection plans (anonymised).

3.2.3 Managing Referrals

- I. Receiving reports of alleged or suspected child abuse within the school, or reported by a child relating to incidents at home or outside the school, and referring these to:
 - a) The Children's Social Care Services
 - b) The Disclosure and Barring Service (where a person is dismissed or left due to risk or harm to a child) and
 - c) The police (cases where a crime may have been committed).
- II. Also, to take appropriate action in response, as set out below:
 - a) Keeping records
 - b) Passing on information to a new establishment when a child leaves the school
 - c) Liaising with the staff and keeping the Headmaster fully informed of all relevant issues
 - d) Liaising with the Designated Governor

3.2.4 Training

The DSL and DDSs are fully trained for the demands of this role in child protection and interagency working and should regularly attend courses with child support

agencies to ensure that they remain conversant with best practice, and receive appropriate refresher training carried out at least every two years and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually. All other staff will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

This training meets the requirements of the DfE's 'Keeping Children Safe in Education' (KCSIE 2018).

The key training elements are:

Induction Training – this is mandatory and should include;

- the child protection policy;
- the behaviour policy;
- the staff behaviour policy (sometimes called a code of conduct);
- the safeguarding response to children who go missing from education; and
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (see KCSIE (2018))

In addition, the DSL should:

- a) Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection Policy and procedures, especially new and part time staff. The DSL is responsible for organising and delivering child protection induction, and for regularly updating all school staff on Safeguarding developments, for example, through staff meetings, emails and notices.
- b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- c) Be able to keep detailed, accurate, secure written records of concerns and referrals. Keeping written records of concerns about a child even if there is no need to make an immediate referral. Ensuring that all such records are kept confidentially and securely, separate from pupil records and are copied on to the child's next school. Ensuring that an indication of further record-keeping is marked on the pupil records.
- d) Obtain access to resources and attend any relevant or refresher training courses.
- e) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.

3.3 The Safeguarding Team

The DDSL is appropriately trained and, in the absence of the DSL, carries out those functions necessary to ensure the on-going safety and protection of pupils. In the event of the long term absence of the DSL, the DDSL will assume all of the functions above. Staff are reminded that they can always take advice from local children's social care (KCSIE (2018), paragraph 26).

3.4 The Governing Body is responsible for:

3.4.1 Ensuring compliance with legal duties with relation to the management of Safeguarding and Child Protection in the school and that the policies, procedures and training in the school are effective and legally compliant. The governing body ensures that the following areas are appropriately managed:

3.4.2 Inter-agency working:

Ensuring that the school contributes to inter-agency working (Working Together to Safeguard Children 2018)

- i. the school's Safeguarding and Child Protection arrangements take into account the procedures and practice of the local authority
- ii. a member of the governing body is nominated to liaise with the designated officers from the local authority and partner agencies in the event of allegations of abuse made against the Headmaster.

3.4.3 Safeguarding Policies:

Ensuring that there are effective child protection and staff behaviour policies in place and operating effectively: there is an annual review of the school's Safeguarding and Child Protection policy and procedures, and the efficiency with which the related duties have been discharged.

3.4.4 Appointment of a Designated Safeguarding Lead:

This is currently the Deputy Head (Pastoral), Jonny Timms, who is afforded the necessary time, training, resources and support to carry out his duties and responsibilities in this aspect of his role.

3.4.5 Providing opportunities to teach safeguarding to pupils:

At Caldicott pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

3.4.6 Inspection Compliance:

Ensuring compliance with all school inspection requirements.

3.4.7 Safer Recruitment:

Ensuring that the school endeavours to prevent people who pose a risk of harm from working with children at the school. A deterrent to all such people is in place from the start of the recruitment process, continues through the process to appointment and

throughout the employee lifecycle. This is outlined in the school's Safer Recruitment Policy.

3.4.8 Procedures to handle allegations of abuse made against staff or other children:

Ensuring that the school Safeguarding and Child Protection policy guidance covers how to handle allegations against staff, volunteers and other children.

3.4.9 Meeting the additional requirements for boarding schools with regard to safeguarding:

Ensuring that the National Minimum Standards for Boarding Schools are met.

3.4.10 The Designated Governor will undertake training in Safer Recruitment and Safeguarding and Child Protection.

3.5 The Headmaster is responsible for:

3.5.1 The Safeguarding Policy and procedures are implemented and followed by all staff.

3.5.2 Sufficient time is allocated to the DSL and the DDSLs to carry out their roles effectively.

3.5.3 All staff are able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy.

3.5.4 Pupils' safety (including e-safety) and welfare are addressed through the curriculum.

4. Supporting Children

The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils. More information can be found on the Contextual Safeguarding Network's website: <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

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

4.2 Time is allocated in LfL/PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right.

Assemblies, drama and RS lessons are used to promote tolerance and mutual respect and understanding.

- 4.3 All pupils know that there are adults to whom they can turn if they are worried, including the school counsellor, the chapel master and the medical staff. If the school has concerns about a child there is always a recognised requirement for sensitive communication and all staff members are aware of the need to avoid asking leading questions.
- 4.4 Our prefects have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, prefects are given induction on appointment which includes how to contribute to the school's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse.
- 4.5 A Child in Need refers to a pupil whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential. The School will refer to external agencies such as CAMHS (Child and Adolescent Mental Health Service) or Bucks County Council's Children's Social Services for advice and support.
- 4.6 A Child at Risk is a pupil who is in immediate risk of harm and such cases will be referred to First Response as a matter of urgency (normally within 24 hours).
- 4.7 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- 4.8 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.
- 4.9 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.10 All Caldicott staff should be aware of the early help process and understand their role to take timely action to help a child if they have a safeguarding concern. Caldicott will support all pupils by:
 - a. Providing access to at least 2 telephone help lines and web addresses enabling them to call for support in private (see guidance below).
 - b. Providing every child with a homework diary which contains guidance on where to turn for advice. See below:
 - i. *Your parents, your tutor, any adult member of staff or your friends can usually help you through times of anxiety. If you are still worried the following suggestions might help: i. The Outside Listener: Mrs Anne Dyer. She has her own children who have grown up. She has agreed to give her telephone number so that boys who feel that no one at school is listening to them can give her a call on 01753 644404 ii. The Black Box: Some boys may find it difficult to talk about a worry and may find it easier to write the worry down. This is fine. Write your worries on a piece of paper and post it in the Black Box. The Deputy Head (Pastoral) will read your note and help you. iii. The School Counsellor*

is Kate Brown. She does not work here but is very happy to come to Caldicott if she is needed. Boys should talk to the Headmaster or their tutor if they would like to meet her. We would need to ask your parents' permission before this could happen. iv. Childline is a national emergency number for children who need help. 0800 1111. The phone number for the Children's Rights Commissioner (0800 528 0731) is advertised on all school telephone booths.

- c. Displaying advice in the Medical Centre and Boarding Houses on where pupils can seek help, including confidential help lines and web addresses for external specialists such as ChildLine.
- d. Providing leadership training to our prefects which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
- e. Providing regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the school's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying and searching, screening and confiscation please refer to the school's anti-bullying and e-safety policy. The school recognises that most children will also access the internet outside and beyond the school infrastructure.
- f. Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- g. Promoting a caring, safe and positive environment within the school
- h. Drawing on the support of the half termly visiting clinical psychologist, who is charged with providing both advice and support. We have full triage facilities with Dr Hodson's practice at Everlief so we can seek urgent support rapidly. Key issues tackled recently include supporting children in emotional distress such as anxiety, stress, low self-esteem as well as providing support and guidance with parenting and family issues. Please speak to the Deputy Head Pastoral for further information.
- i. Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- j. Notifying Social Care as soon as there is a significant concern.
- k. Providing continuing support to a pupil about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the pupil's new school and ensuring the school medical records are forwarded as a matter of priority.

- 4.11 Where the school has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL should discuss these with Children's Social Care Services.
- 4.12 There may be times when staff, in the course of their duty may, in exceptional circumstances, have no option other than to use physical intervention to restrain children, either to stop them from harming themselves or others. Should this occur the Headmaster requires the member of staff involved in any such incident to report it to him (or in his absence the Deputy Head Pastoral). The Headmaster will make a record of the incident, in case the action is later questioned. In all and every instance where staff have used any physical intervention to restrain a child, the child's parents will be fully advised of the circumstances and the level of physical intervention applied the same day or as soon as practicable (see Behaviour Policy). Caldicott ensures that safeguarding and welfare concerns are taken into account when restraint is used on children with SEND. Caldicott uses individual plans in order to minimise the likelihood of challenging behaviour, and when it does occur, that there is less use of physical restraint and other restrictive methods.

Safeguarding children with SEND

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers.

At Caldicott we identify pupils who might need more support to be kept safe or to keep themselves safe.

5. Record Keeping and Confidentiality

- 4.13 All records relating to Safeguarding and Child Protection preceding October 2018 are held in the Red Folders held in the locked cupboard in the Front Office. All records from October 2018 onwards are logged via *MyConcern*, the software used for recording and managing all safeguarding concerns.
- 4.13.1 All records relating to Safeguarding and Child Protection (adult) are held in a locked filing cabinet accessible only by the Headmaster, DSL and DDSL.
- 4.13.2 There is a separate Practice Guidelines document detailing the administration of the Child Protection file processing of documents and Concern Forms therein. This is monitored by the school's Governing

Body/Governor with oversight of The Safeguarding and Child Protection practice at school.

- 4.14 We recognise that all matters relating to safeguarding are confidential. It may be useful to note the following statement from Keeping Children Safe in Education (2018), paragraph 75: 'The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.' You may also wish to add the line from paragraph 77: 'This includes allowing practitioners to share information without consent.'
- 4.15 The Headmaster or DSL will disclose any information about a pupil to other members of staff on a need to know basis only.
- 4.16 Guidance about sharing information, can be found in the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, 2018).
- 4.17 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 4.18 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 4.19 We will always undertake to share our intention to refer a child to Social Care with their parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the First Response Team on this point.
- 4.20 Caldicott will retain these records until the child is 25 years old. They will then be destroyed in a responsible manner.

6. Staff Training

- 4.21 It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. Safeguarding is the responsibility of all members of staff and all staff should know what to do to raise a concern. New staff (including temporary staff), volunteers and governors will receive training during their induction. Induction training will include:
- The school's behaviour policy
 - The school's procedure for managing children who are missing from education
 - Familiarisation with this policy (Safeguarding and Child Protection Policy)
 - Staff Code of Good Practice
 - Whistleblowing Policy
 - The identity of the DSL and DDSs and use of Concern Forms and *MyConcern*
 - Updates to Part I and Annex A of the Keeping Children Safe in Education guidelines.
- 4.22 Staff training will also include alerting staff to the risks of radicalisation as set out in the Prevent Duty. Training in the Prevent Duty will include knowing how to

identify children and young people at risk. This training will be updated on a regular basis in line with recommendations from the BSCB.

4.23 As of September 2017, all staff will complete 'Child Protection in Education level 2' through the online training programme, *EduCare*. This will be blended and followed up with face to face training by the Safeguarding team. At the end of all training, the 4 questions we ask staff are:

What have you learnt [today] that you didn't know before?

What did you know before, but now see in a different way?

What further questions, has this session prompted you to ask?

What's one thing you're going to do differently from now on?

7. Child Protection Procedures

7.1 Recognising Abuse: The Four Categories of Significant Harm and Signs of Abuse

Somebody may abuse or neglect a child by inflicting harm, or by knowingly not preventing harm. Children may be abused in a family, the community, an institutional setting, or more rarely by a stranger. Most young people who are abused know their abuser. It is also important to recognise the particular vulnerabilities of those with SEN.

Working Together to Safeguard Children sets out definitions and examples of four broad categories of abuse:

7.1.2 1. 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.

Some of the following signs may be indicators of physical abuse:

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained bruises or cuts; burns or scalds or bite marks.

7.1.3 2. 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.

Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

7.1.4 3. 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.

Some of the following signs may be indicators of sexual abuse:

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

7.1.5 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.

Some of the following signs may be indicators of 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.

7.1.6 4. 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some of the following signs may be indicators of neglect:

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

7.2 Specific Safeguarding issues

Some children can find themselves in more vulnerable situations. Be mindful of the following:

- [bullying including cyberbullying](#)
- [children missing education](#) – and Annex A
- [child missing from home or care](#)
- [child sexual exploitation](#) (CSE) – and Annex A
- [county lines](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation](#) (FGM) – and Annex A
- [forced marriage](#)- and Annex A
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls](#) (VAWG)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)
- [preventing radicalisation](#) – and Annex A

- [relationship abuse](#)
- [sexting](#)
- [sexual harassment and sexual violence](#)
- [trafficking](#)

7.3 Signs of Abuse

Definition of 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. They may be abused by an adult or adults or another child or children.

Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

7.4 What to do when a child wants to tell you about something that has happened:

- a. Listen very carefully.
- b. Do not promise confidentiality.

- c. Ask 'open' questions like 'can you tell me what has happened', and avoid any leading questions like 'Did he/she do X to you?'
- d. Make written notes as soon as possible, including anything that you have said.
- e. Do not take it upon yourself to investigate what the child has told you.
- f. Do not tell the person about whom the child has complained.
- g. If you think that, a child is at risk contact the DSL, or DDSL or ADSLs.

7.5 How to log a concern on *MyConcern* or complete a Concern Form and write a report on what you have been told:

- a. Whenever possible, staff should log into MyConcern: <https://www.myconcern.education/Account/Login?returnUrl=%2F>, click on "Report a concern" and complete the form as prompted.
- b. If this option is not practicable for whatever reason, Concern Forms are available as hard copy from the Front Office or any member of the safeguarding team. Copies are also available in section 23 of this policy.
- c. Complete the form, noting the date, time, the child's name and your name.
- d. Note the 'who/what/where/when' of the allegation.
- e. Note your own opinion if it is relevant, preferably with justification.
- f. Reflect on why you have logged the incident.
- g. Hand the report to the DSL, or DDSL or ADSLs.

7.6 Procedure for staff about reporting a concern

Any member of staff who either knows of, is told of, or strongly suspects any incident of abuse occurring in the school between pupils, or to a child of the school at home or outside the school, must report the information the same day to the DSL or in his absence to the DDSL or ADSLs who will immediately contact Children's Social Care Services.

7.7 Investigations into Child Abuse are Always Externally Managed

- a) Members of the school do not investigate reports of abuse themselves.
- b) Alleged victims, perpetrators, those reporting abuse and others involved will not be interviewed by members of staff beyond the point at which it is clear that there is an allegation of abuse.
- c) The interviewing of children and adults, if necessary, will be carried out externally by specially trained staff only, following procedures in line with government requirements and in the light of the recommendations of past inquiries into the handling of child abuse issues.
- d) The school acknowledges that its policy will inevitably lead to some investigations by external agencies being triggered, which do not substantiate the allegations made, as well as those that do.
- e) It is a basic assumption that it is better to endure some 'false alarms' than to fail to initiate specialist investigation of instances of real abuse by Children's Social Care Services:

Contacts at the local authority (Buckinghamshire County Council):

- Education Safeguarding Advisory Service 01296 382912
- Education Safeguarding Advisor 01296 382732
- Local Authority Designated Officer (LADO) 01296 382070
- Social Care First Response Team 0845 4600 001
- RU Safe?
(Barnardos–Child Sexual Exploitation Service) 01494 461112
- Social Care - Out of Hours 0800 999 7677
- Thames Valley Police 999 (in emergency)
(Child Abuse Investigation Unit) 101 (non- emergency)

Buckinghamshire Safeguarding Children Board
For procedures, policies and practice guidelines

Bucks Family Information Service 0845 688 4944

School Web

School bulletin, Safeguarding links, A-Z guide to information and services

Buckinghamshire Grid for Learning e-Safety [Bucks C C e-Safety](#)

Local Safeguarding Children Board www.bucks-lscb.org.uk

Should you wish to contact the local authority directly, you can access their contact details by entering a postcode on this website:

<https://www.gov.uk/report-child-abuse-to-local-council>

7.8 When an allegation of abuse is made

Any staff member to whom an allegation of abuse is made should:

- a) Not promise confidentiality.
- b) Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding 'leading' the child or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened.
- c) Not ask questions like "Did he do x to you?" If you do need to ask a question for clarification try to use the following tool

T – tell me ...

E –explain ...

D –describe...

This should support you to ask open questions.

- d) Stop asking any more questions as soon as the child or adult has disclosed that he or she believes that something abusive has happened to him or her, or to someone else.
- e) Tell the informing child or adult that the staff member will now make sure that the appropriate people are brought in to follow the problem up (these will include the specialist social worker and that worker may need to involve the police).
- f) Ask the informing child or adult what steps they would like to be taken to protect them now that they have made an allegation and assure them that the school will try to follow their wishes.
- g) Refer the matter immediately, preferably via *MyConcern* with all relevant details, to the DSL (the DDSL or one of the ADSLs), the Headmaster.
- h) If this cannot be done, in exceptional circumstances, the staff member should contact First Response. If the child is at immediate risk, staff will not delay and call 999.
- i) Make a written record as soon as possible, of what they have been told and make a copy of this available to the DSL (or the DDSL or the ADSLs).
- j) Remember that all matters relating to child protection are confidential.

7.9 When an Allegation is passed on

On receiving an allegation of abuse, including alleged abuse by one or more pupils against another pupil, the DSL (or the DDSL or the ADSLs) should:

- a) Take steps needed to protect any child involved from risk of immediate harm. This may involve allocating an appropriate member of staff, as far as possible a person chosen by the child him/herself, to stay with him or her. Similarly, an Inspector receiving an allegation of abuse at the school may stay with the child concerned until suitable arrangements for his or her protection are made.
- b) Not interview or investigate the allegation further, but refer the matter the same day to First Response
- c) Speak personally to the Children's Social Care Services and not rely on leaving a message.
- d) Follow advice about contacting parents, other staff, police, doctor or alleged perpetrator or witnesses directly and agree any necessary next steps in relation to:
 - i. Informing a child's parents (there are circumstances where it would be inappropriate to inform parents immediately an allegation has been made).
 - ii. Medical examination or treatment for the child (again, there are circumstances where medical evidence will be needed). Immediate protection may be needed for a child who has been the victim of abuse.
- e) Take immediate and appropriate steps to protect the child who has given information about abuse and any child against whom an allegation has been made (each of these may now be at risk).
- f) Inform other people at the school who need to know (including any other member of staff) of the allegation and its investigation. Experience has shown that knowledge of an allegation or impending investigation can lead to a serious risk to the informant from the alleged perpetrator, or 'covering up' of evidence that may be sought by police such as

collections of child pornographic photographs, or to pressure being applied to others to remain silent.

- g) Inform the child or adult who made the initial allegation of what the next steps are to be, having agreed these with the Children's Social Care Services Advisor.
- h) Inform the Headmaster (unless he is the subject of the allegations or suspicions) of the allegations and the action taken as above, and agree necessary further action in line with these standards. It is the Headmaster who makes the decision whether to suspend from duty, pending investigation, any staff member who is alleged to have abused a child or children, taking into account the advice of the LADO or police.
- i) Take any steps for the longer-term protection and support of each child who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes into account.
- j) Take any necessary steps to protect and support a child who is alleged to have abused another.
- k) Where the allegation has been made by a member of staff, remind them of the school Whistle-Blowing Policy that covers instances where an allegation has been made in good faith by any person or persons and such persons have complete immunity for their actions.

8. Allegations or Disclosures of Abuse

8.1 Allegations against staff, volunteers, the DDSL or the ADSLs should be reported to the Headmaster. If the DSL is absent, the allegation should be passed to the Headmaster if the Headmaster is away, then passed to the Chairman of Governors. If the allegation concerns the DSL, the person receiving the allegation should immediately inform the Headmaster, if she is not available, then the Chairman of Governors. If the allegation concerns the Headmaster, the person receiving the allegation should immediately inform the Chairman of Governors, without notifying the Headmaster first. In all cases via either the DSL, DDSL, ADSL, or the Headmaster, the Local Authority Designated Officer (hereafter "LADO") must be promptly informed. In case of serious harm, the police should be informed from the outset.

8.2 When an allegation is made against a member of staff or volunteer:

- I. If the member of staff concerned is resident, then the school will arrange for such member of boarding staff to be provided alternative accommodation off-site pending an investigation of a child protection nature.
- II. The school must report to the Disclosure and Barring Services (DBS) promptly and at least within one month of leaving the school, any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she was involved in any allegation of child abuse. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the school may be removed from the DfE register of independent schools.
- III. The school is also under a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable

professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Further guidance is published on the TRA website. Where a referral has been made to the DBS, it is also necessary for a referral to be made to TRA.

- IV. The Charity Commission’s guidance on serious incident reporting which was published in September 2017 (“Guidance”) refers to the fact that one of the most common types of serious incidents is safeguarding issues. When deciding whether a safeguarding issue or allegation of abuse qualifies as a serious incident which needs reporting, the governors keep a record of the fact that they have considered it.
- V. Files relating to staff will be retained for 10 years or until the member of staff retires.

8.3 Disciplinary Action

The school should consider taking, and if necessary will take, disciplinary action against any member of staff or agent of the school where it is believed that children are at risk of abuse from that member of staff, even in cases where there is to be no criminal prosecution.

8.4 Low Level Concerns

Where the school has ‘low level’ concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL should discuss these with Children’s Social Care Services.

8.5 Peer on peer abuse

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not 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;
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At Caldicott we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

Abuse is abuse. It is no longer acceptable to tolerate peer-on-peer abuse, dismiss it as normal behaviour amongst children, or pass it off as “banter” or “part of growing up”. These are safeguarding issues, and must be referred to the DSL. If there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, they will be referred to the local authority or the police. Members of staff must not attempt to deal with them as pastoral, classroom or disciplinary issues, and should not impose their own thresholds before consulting the DSL. It is true that there will sometimes be a grey area between, on the one hand, incidents which should be regarded as abusive, and on the other, incidents which are more properly dealt with in schools such as (for example) children fighting. However, the DSL can advise staff on the thresholds which pertain to different definitions of peer-on-peer abuse, and in unclear cases will consult the local authority or police as necessary. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Caldicott will consider the conduct of the alleged perpetrator as part of their behaviour policy on the 'balance of probabilities' and apply appropriate and proportional consequences.

It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

8.5.1 The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil. Groups at particular risk include students who identify as LGBT+, or are perceived by peers to be LGBT+, and pupils with SEND.
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

8.5.2 Examples of safeguarding issues against a student could include:

Physical Abuse

- violence, particularly pre-planned
- forcing others to use drugs or alcohol

Emotional Abuse

- blackmail or extortion
- threats and intimidation

Sexual Abuse

- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography or take part in sexting

Sexual Exploitation

- encouraging other children to attend inappropriate parties
- photographing or videoing other children performing indecent acts

Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

8.5.3 Minimising the risk of safeguarding concerns towards pupils from other students

On occasion, some students will present a safeguarding risk to other students. The school should be informed that the young person raises safeguarding concerns, for example, they are coming back into school following a period in custody or they have experienced serious abuse themselves.

The guidance is clear that victims and alleged perpetrators can be kept apart in classrooms and other shared spaces. The emphasis should be on ensuring that the victim can continue their normal routines.

These students will need an individual risk management plan to ensure that other pupils are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

Such incidents will be recorded across the whole spectrum of sexual violence and sexual harassment, so that as a school, Caldicott can understand the scale of any problem and make appropriate plans to reduce it.

8.5.4 Sexting

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

8.5.5 Sexual Violence and Sexual Harassment between children (DfE, May 2018)

As set out in the DfE Guidance, Sexual Violence refers to criminal acts: rape, assault by penetration and sexual assault, as defined by the Sexual Offences Act 2003. Sexual harassment is described as 'unwanted conduct of a sexual nature'.

- 8.5.3.1** We recognises that sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

- 8.5.3.2** Through training, all staff are aware that sexual violence refers to sexual offences under the Sexual Offences Act 2003 and include rape, assault by penetration and sexual assault.
- 8.5.3.3** Through training, all staff are aware that sexual harassment is 'unwanted conduct of a sexual nature' that can occur online or offline and is likely to degrade, humiliate and /or intimidate a child.
- 8.5.3.4** Children are taught about healthy, respectful relationships and cultures of sexual harassment through a planned Relationship Education and through Learning for Life (LfL).
- 8.5.3.5** At Caldicott, any incidents of sexual violence and/ or sexual harassment will not be tolerated, it be will be taken seriously and will not be dismissed without investigation.
- 8.5.3.6** Any incidents of sexual violence or sexual harassment will be dealt with in a timely manner, following the school's usual safeguarding protocols, the DFE guidelines, as set out in Sexual violence and sexual harassment between children in schools and colleges (May 2018) and, where appropriate, Sexting in Schools and Colleges produced by the UK Council for Child Internet Safety.
- 8.5.3.7** Clear records of any incidents reported will be maintained securely, along with records of discussions and decisions.
- 8.5.3.8** The Designated Safeguarding Lead (DSL) will liaise with appropriate outside agencies, such as the police and/or social care and only involve staff members who are required to support the children. Staff will work collaboratively with children and their families to achieve the best possible outcome.

9. Child Protection – Code of Good Practice

Code of Behaviour – The Do's...

- Do put this code into practice.
- Do set an example you would wish others to follow.
- Do treat everyone with dignity and respect.
- Do treat all young people equally – show no favouritism.
- Do ensure that if you are in a one-on-one situation with a young person that the door is either open or contains a glass panel and that another adult is aware of your meeting / lesson.
- Do respect a young person's right to personal privacy.
- Do allow young people to talk about any allegations and concerns that they may have and refer immediately.
- Do encourage others to challenge attitudes / behaviours that they do not like.
- Do avoid being drawn into inappropriate attention seeking behaviour e.g. tantrums and crushes.
- Do remember this code even at sensitive moments. E.g. when responding to bullying, bereavement and abuse.
- Do keep other members of staff informed of where you are and what you are doing.
- Do remember that someone else may misinterpret your actions however well intentioned they may be.

Do take note that there does need to be an appropriate level of supervision to safeguard young people in changing rooms. However, this supervision must be appropriate to the needs and age of the young people concerned.

Do ensure that if you need to have appropriate physical contact with a child that you ask their permission first. e.g. PE / Music / Drama / comforting a distressed child.

Do remember any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed.

Dress Code:

Do ensure your appearance is always appropriately professional. Dress, which might be deemed offensive, distracting, revealing or provocative, must be avoided: clothing should be modest. Teachers should wear smart professional clothes in the classroom; PE or sports clothing should only be worn in PE or games lessons.

If you are in doubt about any form of clothing, you should seek advice from the Deputy Heads. You will be required to change your clothing if it is not considered suitable or appropriate by the Headmaster or Deputy Heads.

Use of Mobile Phones and Electronic Devices:

Staff may not use their phones / personal devices for personal use whilst on duty. Please refer to the school policy on “Images of Pupils for Record Keeping and Promotional Purposes: Photographs, Videos and Electronic Media”.

Code of Behaviour – The Don’ts...

- Do not trivialise abuse.
- Do not enter any boarding house without the knowledge of the appropriate member of the boarding team.
- Do not let allegations, suspicions or concerns about abuse go unreported.
- Do not permit abusive peer activities e.g. initiation ceremonies, bullying.
- Do not engage in inappropriate behaviour or contact – physical, verbal or sexual.
- Do not play physical contact games with young people.
- Do not use mobile phones when on duty.
- Do not make suggestive remarks or threats to a young person even in jest.
- Do not use inappropriate language – face to face, in writing, phoning, email or internet.
- Do not share personal email addresses with pupils or engage in social media.
- Do not arrange meetings out of school or visit a young person’s home without permission from the Headmaster.
- Do not convey a child in a car unless parental/Headmaster’s permission has been given.
- Do not develop sexual relationships with pupils. If you in a position of trust and develop a sexual relationship with a young learner under the age of 18 it may constitute a criminal offence under the Sexual Offences Act.
- Do not rely on your good name to protect you.

10. Establishing Good Practice: Minimising Vulnerability to Allegations

Always:

- work in an open environment. Avoid private or out of sight locations and encourage open communication.
- speak clearly, without whispering, so that students do not need to come close to hear
- avoid spending time alone with individual students away from others
- treat all students, regardless of race, disability, religion or belief, gender, sexual orientation, equally and with respect and dignity.
- ensure the student's welfare comes first and record it.
- be aware of the impact of proxemics; maintain safe and appropriate distances; Know where and how to place your body.
- avoid touching students, but where **educationally necessary** staff should follow these guidelines:
 - try to demonstrate without touching first
 - ask permission; say what you intend to do first and explain why
 - if a pupil seems uncomfortable: stop
 - only touch hands, arms or shoulder nearest you (don't reach across the body)
 - be aware of overall proximity; maintain physical space; don't stand behind
 - inappropriate areas for touch include: chest, diaphragm, waist, thighs move away as soon as the contact is no longer required
 - maintain professional boundaries, perhaps using a specific mobile number or email address for work purposes, rather than sharing personal details
 - present as an exemplary role model by not smoking or drinking alcohol, swearing, allowing suggestive conversations or jokes or wearing less than professional clothing when in the company of a student
 - seek to be enthusiastic and constructive when giving feedback rather than making negative or critical remarks
 - record any injury that occurs and seek attention from a qualified First Aider or parent.
 - record any incident of concern involving student's welfare.

Never:

- allow allegations made by a child to go unchallenged, unrecorded or not acted upon (this applies to any form of abuse or bullying);
- lock doors, cover windows or use 'Do Not Disturb' signs;
- impose humiliating or power based punishments on a student or reduce a child to tears;
- engage in rough, physical or sexually provocative games, including horseplay;
- allow or engage in any form of inappropriate touching;
- share a bedroom with a child;
- allow children to use inappropriate language unchallenged;
- make sexually suggestive comments to a young person, even in fun;

- engage in any form of relationship, sexual or otherwise, with a young person you work with even if they are over the age of consent, but under 18 (older with vulnerable adults);
- do things of a personal or intimate nature for children or disabled young people that they can do for themselves;
- invite or allow children to stay with you at your home unsupervised;
- 'friend' a child on their social media or yours; social media can blur boundaries;
- take photographs or videos of children unless written/signed consent has been obtained from a parent/carer; this includes the use of phones.
- seek physical contact. Try to gently discourage contact, rather than reject students. Model appropriate contact, e.g. shaking hands or patting the shoulder. Never allow physical contact when you are alone.
- take a child in your car, but where this is unavoidable:
 - prepare a risk assessment
 - ensure your insurance covers business passengers (NB this may provide a very good reason for not being able to take students in your car.)
 - obtain parental permission, preferably in writing
 - take more than one person
 - sit child in the back
 - travel directly to the destination
 - keep conversation professional

11. Quick Reference – Summary

If you suspect abuse, you receive a complaint or allegation.

If you suspect abuse, a young person confides in you, or a complaint is made about any adult or yourself, it is your duty to report the concern immediately to the DSL, the DDSL or one of the ADSLs.

If a young person tells you about abuse by someone else or if you have a concern about a young person's safety or well-being:

1. Allow the young person to speak without interruption, accepting what is said.
2. Offer immediate understanding and reassurance whilst passing no judgement.
3. Advise the young person that you will try to offer support but you must pass the information on.
4. Immediately tell the DSL, DDSL or one of the ADSLs.
5. Write careful notes of what was said / what you witnessed / heard or were told. Please use *MyConcern* <https://www.myconcern.education/Account/Login?returnUrl=%2F> or the Concern Form in section 23 of this document.
6. Sign, date and pass your notes onto DSL, DDSL or ADSLs.

If you receive a complaint or allegation about any adult or yourself:

1. Immediately tell the DSL, DDSL or ADSLs.
2. Write careful notes of what was said / what you witnessed / heard or were told. Please use CP concern sheet (where possible).
3. Sign, date and pass your notes onto the DSL, DDSL or ADSLs.
4. Try to ensure that no one is placed in a position, which could cause further compromise.

Note: Any adult at Caldicott school has the right to report any concerns, or suspicions about another member in confidence and free from harassment (see Whistleblowing Policy).

You must refer; you must not investigate.

If you are in any doubt about policy or procedure, please contact:

The DSL and Deputy Head (Pastoral), Jonny Timms, or any member of the Safeguarding Team.

12. Monitoring and Evaluation

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

- Pupil surveys and questionnaires
- PSHE/LfL discussions
- Governing Body monitoring
- Child Protection Red Files
- Frequent scrutiny of attendance data and termly absence/behaviour audits by Heads of Year
- Regular analysis of a range of risk assessments
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the Pastoral Committee and the governing body
- Regular review of parental concerns

- Regular review of the use of ICT rooms and after school activity programme

13. Children Missing from Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2018) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - a. leave school to be home educated
 - b. move away from the school's location
 - c. remain medically unfit beyond compulsory school age
 - d. are in custody for four months or more (and will not return to school afterwards); or
 - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

14. Supporting Staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

15. Parents

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Headmaster

who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the LADO or Social Services.

16. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO. The School will aim to provide immunity from retribution and no disciplinary action will be taken against staff for 'whistleblowing' in the public interest. See the Whistleblowing Policy in the appendix.

17. Physical Restraint

Our policy on physical intervention by staff is set out separately, and acknowledges that staff must only ever use physical intervention as a last resort, when a child is endangering himself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be recorded and signed by a witness. Staff who are likely to need to use physical intervention will be appropriately trained. We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures. We recognise that touch is appropriate in the context of working with children and all staff have been given "Safe Practice" guidance to ensure they are clear about their professional boundary.

Caldicott ensures that safeguarding and welfare concerns are taken into account when restraint is used on children with SEND. Caldicott uses individual plans in order to minimise the likelihood of challenging behaviour, and when it does occur, that there is less use of physical restraint and other restrictive methods.

18. Bullying

Our policy on bullying is set out in a separate document called The Anti-Bullying Policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes cyber, racist, homophobic and gender related bullying. A bullying incident may be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

19. Racist Incidents

Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

20. Health and Safety

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment, and for example in relation to internet use, and when away from the school when undertaking school trips and visits.

21. Alternative Provisions

Caldicott is responsible for the safeguarding of their pupils when they are placed in an alternative provision. KCSIE (2018) says that schools should obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff.

22. Home-stays (Exchange Visits)

If children are staying with parents from overseas as part of an exchange, KCSIE (2018) is very clear, they do need to have an enhanced DBS check. The DBS service will process these checks without payment because those parents are volunteers. If there are other people in the family aged over 16, then the school can decide whether they will do an enhanced DBS check for those 16 and 17 year olds who live in the house.

23. Caldicott Welfare and Safeguarding Form

Whenever possible, staff should log into MyConcern to record a concern: <https://www.myconcern.education/Account/Login?returnUrl=%2F>, click on "Report a concern" and complete the form as prompted. If this option is not practicable for whatever reason, then please use the form below.

Report a Concern

Pupil name AKA	Date of birth Year Group
Name and position of person completing form (please print)	
Time and Date of incident /concern: dd/mm/yy	Any other documents included with concern form (please list)
Incident / concern (who what where when) (Please use continuation n sheet Y/N No of sheets used.....)	
Any other relevant information (context of info shared, witnesses, immediate action taken)	
Action taken by staff member	

Reporting Staff Signature Date.....

Date and Time Passed to DSL.....

To be completed by DSL/DDSL

Action Taken by Designated Safeguarding Lead (if advice sought from outside agency, complete box at bottom of form)

Response/ outcome (please record all steps taken and details of follow-up date)

- **Watching brief (including name of Lead Teacher)**
- **Child Protection concern – file opened (date)**
- **Discussed with parent/guardian – yes or no (if no, why not) and by whom**
- **Feedback given to reporting individual & by whom (if not, why not)**

DSL Signature..... Date

Details of Agency Contact (if applicable);

Agency Contacted:

Person spoken to (Full Name):

Job Role:

Contact Phone Number:

Contact email:

Recommendations Given:

DSL Signature..... Date

24. APPENDIX 1

POLICY: **IMAGES OF PUPILS FOR RECORD KEEPING AND PROMOTIONAL PURPOSES (Photographs, Videos and Electronic Media)**

Updated: January 2018

Review date: August 2018 or as necessary

Responsible Person: Deputy Head Pastoral, Jonny Timms

A. Purpose

To ensure that the school is operating good practice around the taking and use of images of pupils and is working within the requirements of the Data Protection Act 1998. Under this act, Caldicott must seek parental consent to take photographs and use video recorders to take and use images of pupils.

This policy should be read in conjunction with the E-safety policy.

This policy is for the information, advice and guidance of all staff, parents, governors, volunteers and visitors to the school.

B. Context: the uses of images:

Children have their photographs taken on school cameras and downloaded onto the school system to provide evidence of their achievements for developmental records (The Early Years Foundation Stage, EYFS 2012). Photographs may be taken during indoor and outdoor play and displayed in albums or a child's development records for children and parent/carers to look through.

We also use anonymous images of pupils for promotional purposes – for example in brochures or on the school website.

C. Practice Guidelines:

1. Consent

Parents who accept a place for their child at the school are invited to agree to the school using anonymous photographs and video of their child and information relating to his achievements for promotional purposes, which may be used in school publicity. This forms part of the Parent's Contract.

2. Storage of Images

- i. Photographs will be stored on the Caldicott computer system, which is password, protected. If the school ceases to operate, all photographs will be shredded or deleted from the Caldicott system.

- ii. Caldicott's digital camera/s or memory cards must not leave the school premises except for use on outings. Photos are printed in the setting by staff and images are then removed from the camera's memory.

3. Use of personal mobile devices

- i. Staff, visitors and volunteers are only permitted to use their own mobile phones in events such as, Sports day, Outings, Christmas and Fundraising Events. This must always be in full view of all attending.
- ii. Staff may only use their phones/personal devices to take photos of school events on the strict understanding that these are downloaded onto the school system (within 24 hours) and deleted off their personal devices.
- iii. Phones / personal devices should only be used if the school camera is not available. Visitors may only use their phones outside the building.
- iv. Staff are not permitted to use either their own mobile phones / personal devices for personal use whilst on duty.
- v. Use of cameras and mobile phones / electronic media are prohibited in the toilets, changing areas and poolside.

4. Image sharing

- i. Only designated staff can share images/video on social media; other parties must seek explicit permission from parents of the children involved.
- ii. Nobody should take or record any images of Caldicott children for their own records.
- iii. Anyone taking photographs should be alert to the fact that often photographs may contain other children in the background and consideration should be given to these children in the context of this policy.

5. Additional guidance and information for staff

- i. In cases of a personal emergency, all personal calls should be directed through the Caldicott office phone.
- ii. Staff are asked not to make personal calls during teaching time. However, in urgent cases, a call may be made or accepted if deemed necessary and by arrangement with the Headmaster.
- iii. Any non-compliance will be taken seriously, logged and investigated appropriately in line with our disciplinary and e-safety policy.

6. Reporting on Compliance and Effectiveness

A report on the application of this policy including numbers of any exceptions resulting in disciplinary action will be available from the Deputy Head Pastoral.

25. APPENDIX 2

POLICY:	PREVENT
Updated:	January 2018
Review date:	August 2018 or as necessary
Responsible Person:	Deputy Head Pastoral, Jonny Timms
Responsible Governor:	Liz Hungin

Caldicott's Prevent Policy responds to the Government's guidance published in July 2015. Governors and staff are aware of their responsibilities to prevent terrorism, radicalisation, HBV and FGM and to know the school's policy in these matters.

The school acknowledges that we all have a duty of education and care both in and out of the classroom, to ensure that pupils grow up to be tolerant and informed individuals who can make reasoned judgements on any situation that may confront them. To this end, our equal opportunities policy, our PSHE and Divinity teaching and our Assemblies and Chapel encourage and reinforce an atmosphere of tolerance and anti-discrimination, while making pupils aware of the many conflicting and sometimes dangerous ideologies into which they might be unwittingly drawn.

Risk Assessment

The school has carefully considered the Prevent Guidance provided by the Government and has consequently deemed the risk to our pupils to be high.

Training

All Caldicott staff have been made aware of the Prevent duty and know how to identify and manage pupils who might be exhibiting extremist attitudes and activity. This policy document and measures implemented in the PSHE programme will be shared regularly with all staff at Insets.

All teaching and boarding staff at Caldicott will complete training via the *Educare* online training provider and well as an online test on General Awareness of the Prevent Duty (http://course.ncalt.com/Channel_General_Awareness/01/index.html).

Through PSHE, Divinity, Assemblies, Chapels, e-safety training and our general pastoral care, the school protects the boys in our care from being drawn into radical activity. Regular reinforcement of awareness and information will be given to key staff at Insets.

Additional Measures

Caldicott constantly monitors internet use and reviews the school filtering processes through our network provider and through our Director of IT. The dangers of online websites and social media will also be highlighted through our e-safety programme in PSHE and talks, specifically looking at social media and radicalisation.

Guest speakers to the school are carefully selected and the content of their presentations to pupils and staff discussed with senior staff in advance. Speakers are met and hosted at all times by a senior member of staff and a log of all visitors to the school is kept in the Main Office.

Working in Partnership

Caldicott has an excellent working relationship with the Local Authorities. All staff are aware that anyone may raise any concerns regarding terrorism, radicalisation, HBV and FGM issues with the Buckinghamshire Children's Services via one of the school's Designated Safeguarding Leads.

All staff are aware that they have a statutory duty to report HBV and FGM. Contact details for the Department of Education extremism helpline are:

- Email: counter.extremism@education.gsi.gov.uk
- Telephone: 020 7340 7264

Contacts at the local authority (Buckinghamshire County Council):

- | | |
|--|----------------------------------|
| • Education Safeguarding Advisory Service | 01296 383912 |
| • Local Authority Designated Officer (LADO) | 01296 382070 |
| • Social Care First Response Team- | 0845 4600 001 |
| • Family Resilience Service Referral Line | 0845 4600 300 |
| • Social Care - Out of Hours | 0800 999 7677 |
| • Thames Valley Police
(Child Abuse Investigation Unit) | 999 (in emergency) otherwise 101 |

Local Safeguarding Children Board www.bucks-lscb.org.uk

26. APPENDIX 3

POLICY:	WHISTLEBLOWING
Updated:	August 2018
Review date:	August 2019 or as necessary
Responsible Person:	HR Manager, Nancy Wright

The School has adopted this policy and the accompanying procedure on whistleblowing to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, a failure to comply with legal obligations, inappropriate behaviour or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside the organisation.

About this Policy

The School is committed to conducting its business with honesty and integrity, and expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The School's policy on whistleblowing is intended to demonstrate that it:

- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the School's disciplinary procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

Procedure

This procedure is separate from the School's adopted procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment situation. If you are uncertain whether something is within the scope of this procedure you should seek advice from the Headmaster or the Bursar.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the School.

Malpractice is not easily defined; however, it includes allegations of fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

A whistleblower is a person who raises a genuine concern relating to suspected malpractice within the School. If you have any genuine concerns related to suspected malpractice affecting any of the School's activities (a whistleblowing concern) you should report it under this procedure.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as:

- Public Concern at Work (an independent whistleblowing charity) (helpline: (020) 7404 6609, email: whistle@pcaw.co.uk, website: www.pcaw.co.uk).
- The NSPCC whistleblowing helpline (tel: 0800 028 0285 or email: help@nspcc.org.uk).

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if you wish to raise a concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating the concern to know your identity, this will be discussed with you.

If there is evidence of criminal activity then the Police will in all cases be informed.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Head or Bursar and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are set out above.

Raising a whistleblowing concern

You are at liberty to raise a whistleblowing concern to the Headmaster, Deputy Heads or the Bursar.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information as the concerns raised are investigated.

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. You will be kept informed of progress and, whenever possible and subject to third party rights, informed of the resolution. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any

disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied that your concern is being properly dealt with you will have a right to raise it in confidence with the Governing Body.

External Procedures

Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue).

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes :-

- That exceptionally serious circumstances justify it;
- That the School would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the School;
- Where the Secretary of State has ordered it.

Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

Protection from Reprisal or Victimisation

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing procedures.