



Stowe School

Safeguarding & Child Protection Policy

This policy is available to parents on the Stowe School website under the heading – Parents’ Hub / Rules and Policies - and hard copies are available from the Headmaster’s Office on request by contacting his P.A. (swigginton@stowe.co.uk).

Author	Crispin Robinson (DSL)	
Date of Review	August 2018	
Approved	August 2018 by Chairman and Nominated Safeguarding Governor	
Approving Body	Full Governing Body & Headmaster in December 2018	
Regulatory References	The Independent School Standards Regulations. Part 3 Welfare, Health & Safety of Pupils KCSIE September 2018	Paragraph 7 – Safeguarding Paragraph 8 – Safeguarding of Boarders
	NMS 11 – Child Protection	B73/B75/B76
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Document distribution:

ISI requirement to be available on request	✓
ISI requirement to be on School website	✓
StoweNet	✓
ISI Portal	✓

STATEMENT OF PRINCIPLES

This policy has been written in accordance with Buckinghamshire Safeguarding Children Board Multi-Agency Procedures (BSCB Multi-Agency Information Sharing Code of Practice (September 2017)). The School fully accepts its obligations under the Equality Act 2010, the Disclosure and Barring Scheme (DBS), legislation (Protection of Freedom Act 2012) and the Statutory Guidance issued under Section 29 of the Counter-Terrorism and Security Act 2015. Stowe School acknowledges its legal responsibilities to safeguard and protect the welfare of children (Children Act 1989 & 2004, Education Act 2002, and The Education (Independent School Standards) Regulations 2014, legislation for England and Wales listed in Working Together to Safeguard Children 2018, (Introduction, para.7), KCSIE 2018 and to promote the welfare of Children (Education Act 2004 as amended by the Children and Social Work Act 2017.

This policy should be read in conjunction with the following documents:

- Safer Recruitment Policy
- KCSIE 2018 (Part 1 and Annex A)
- Working Together to Safeguard Children 2018
- Prevent Policy
- Children Missing from Education
- Missing Pupil Policy
- Visiting Speakers' Policy
- Contractors' Policy & Procedures
- Whistleblowing Policy
- Staff Codes of Conduct
- Anti-Bullying Policy
- School Rules and Regulations
- Pupil Mental Health & Wellbeing Policy
- Relationships & Sex Education Policy
- Equality Policy
- Digital Safety Policy
- Restraint Policy – Calming a Violent Pupil (KCSIE 2018 para.103)
- Off-Site Visit Policy

Stowe School's Designated Safeguarding Lead (DSL) is Crispin Robinson (Second Master), contactable on 01280 818344 / 07887 558692 and if he is unavailable, then, in the first instance, contact the Deputy DSL (DDSL), Louise Springall (Senior Counsellor), on 07775 847247. The Headmaster is also trained as DDSL and resident on site, contactable in office hours on 01280 818240 or out of office in the evenings and overnight on the mobile 07795 325066. If a member of staff, visitor or volunteer suspects that a child is in immediate danger or at risk of significant harm, or suspects a pupil is at risk of being drawn into terrorism, they must inform the DSL immediately. If Staff members have any other welfare concerns about a child, they must follow the School's Safeguarding and Child Protection procedures and refer the matter to the DSL. It is, however, understood by all that any staff member can refer their concerns to Children's Social Services and Police directly.

Should a member of staff make a referral to external agencies they must inform the DSL immediately.

The School is mindful of the guidance on inter-agency working to safeguard and promote the welfare of children given in 'Working Together to Safeguard Children' (2018) and of the requirements of 'Keeping Children Safe in Education' (KCSIE 2018). Stowe School recognises its statutory duty that **safeguarding and promoting the welfare of children is everyone's responsibility**; everyone who comes into contact with children and their families has a role to play in safeguarding children. It is understood that 'children' includes everyone **under the age of 18**. The School extends the same level of pastoral care to pupils over 18, but recognises that they have a different legal status.

Contact details for concerns about a CHILD at risk of significant harm:

Social Services First Response Team & Police (MASH) Tel: 0845 4600 001 or 01296 383962

Out of Hours Emergency Service Tel: 0800 999 7677

For concerns about an ADULT working with children, our Designated Officer (LADO) should be contacted:

Email: secure-LADO@buckscs.gov.uk

Tel: 01296 382070

All Stowe staff, therefore, have a role to play in identifying concerns, sharing information and taking prompt action and will consider, at all times, what is in the best interests of the child (KCSIE 2018). Staff working with children are advised to maintain an attitude of 'it could happen here' when safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. Knowing what to look for is vital in the early identification of abuse or neglect. If staff are unsure, they should always speak to the DSL or DDSs.

Children are at the centre of safeguarding and promotion of welfare by:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

This child-centred approach is fundamental to safeguarding and promoting the welfare of every child. A child-centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.

All practitioners should follow the principles of the Children Acts 1989 and 2004 that state that the welfare of children is paramount and that they are best looked after within their families, with their parents playing a full part in their lives, unless compulsory intervention in family life is necessary.

Children are clear about what they want from an effective safeguarding system and these asks from children should guide the behaviour of practitioners.

Children have said that they need:

- vigilance: to have adults notice when things are troubling them
- understanding and action: to understand what is happening; to be heard and understood; and to have that understanding acted upon
- stability: to be able to develop an ongoing stable relationship of trust with those helping them
- respect: to be treated with the expectation that they are competent rather than not
- information and engagement: to be informed about and involved in procedures, decisions, concerns and plans
- explanation: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
- support: to be provided with support in their own right as well as a member of their family
- advocacy: to be provided with advocacy to assist them in putting forward their views
- protection: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee

Stowe School also recognises the Protected Characteristics under the Equality Act 2010:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

and the importance of promoting the following British values in School to ensure pupils are prepared for life in modern Britain:

- democracy
- the rule of law
- individual liberty
- mutual respect for and tolerance of those with different faiths and beliefs and for those without faith

Stowe School's policy for Safeguarding and Child Protection accords with the requirements of the Buckinghamshire Safeguarding Children Board. It applies to all School employees, governors and to any volunteers working in the School. There are processes of safeguarding induction and training in place, involving staff, governors, volunteers and contractors, which aim to ensure that both this policy and safeguarding procedures are known and understood by those within the School community.

Boarding schools have additional factors to consider with regard to safeguarding. Schools that provide such residential accommodation should be alert to inappropriate pupil relationships and the potential for peer on peer abuse, particularly in schools and colleges with a significant gender imbalance

1. THE SCHOOL'S APPROACH TO SAFEGUARDING AND CHILD PROTECTION

There are five main elements:

- a. Staff recruitment processes that contribute to the creation of a safe environment for children.
- b. The creation of an environment offering a quality pastoral care to pupils that safeguards and promotes pupils' welfare, including the provision of a strong programme of Personal, Social and Health Education (PSHE) that teaches specific safeguarding issues (including online safety) as referenced in KCSIE 2018. The PSHE course also helps pupils build resilience and to understand what constitutes acceptable behaviour whilst empowering them to keep themselves and their peers safe from harm. In addition, pupils are made aware of safeguarding and child protection procedures through induction by the DSL, access to Stowenet, House Handbooks and the Blue Book (School Calendar).
- c. Regular and thorough training of all School staff enables them to discharge to good effect their responsibility to identify children in need of early help or suffering harm and take appropriate action when a pupil exhibits signs, or makes a disclosure indicative of abuse.
- d. Annual Audit or Review of the 'Safeguarding Policy and Procedures' by the School.
- e. The School will ensure that **safer recruitment practices** in line with KCSIE 2018 are **always** followed for:
 - I. All staff employed by the School
 - II. All volunteers
 - III. All contractor staff
 - IV. All trainee teachers
 - V. All governors

Every school and college should have a Designated Safeguarding Lead (at Stowe a DSL) who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

The DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

Stowe's Governing Body has two Governors who take responsibility for the School's safeguarding arrangements: Mrs J Hastie-Smith is the School's **Nominated Safeguarding Governor** who on behalf of the Governing Body, takes the **leadership** responsibility for the School's safeguarding arrangements; she is assisted by a **Deputy Nominated Safeguarding Supervisory Governor**, the Rev. Canon Dr Peter Ackroyd.

All employees, volunteers and other personnel coming into regular contact with pupils will undergo Disclosure and Barring Service (DBS) checks prior to appointment as required by the flowchart set out in KCSIE 2018. Full details of the School's recruitment procedures are set out in the 'Safer Recruitment Policy' published by the School's Human Resources Department and found on Stowenet, as well as the School website.

When pupils are taken off-site for educational purposes, assessment of staffing provided by external agencies (e.g. Field Study Centres), will form part of the risk assessment process. Full details of the School's procedures relating to off-site activities are published in the School's Off-Site Visits Policy.

All newly appointed staff (including any temporary appointments), volunteers and contractors' staff will receive induction appropriate to their role and responsibilities within the School. Newly appointed teaching and pastoral staff will receive an extended induction from the DSL (either before starting or within a week or asap from starting work) that explains and delivers in hard /e copy, the following:

- School Whistleblowing Policy
- Staff Code of Conduct
- Children Missing from Education Policy
- Pupil Behaviour Policy
- KCSIE 2018 Part One and Annex A
- This Safeguarding and Child Protection Policy and the identities and roles of the DSL/DDSLs.

The School will seek to establish a culture in which all feel able to raise concerns about any employee's practices which *prima facie* seem poor or unsafe, and in which reports of such conduct will be given serious and objective consideration. The School's *Whistleblowing Policy* makes clear that those who 'whistleblow' in good faith will be protected from retribution and immune from disciplinary action. It will be explained that the School seeks to ensure that those who work at Stowe are not complacent about threats posed by those whose behaviour neither results in a conviction nor a referral to the Disclosure and Barring Service and yet are actively seeking access to children in order to abuse them.

1.1. REPORTING ABUSE

Any member of staff working for or on behalf of the School, including a volunteer, who either knows of, is told of, or strongly suspects any incident of child abuse occurring in the School, or to a pupil of the School at home or outside the School, must report the information as soon as possible and not longer than the same day to the DSL or, in his / her absence, to one of the DDSLs. The DSL / Headmaster will inform the Chair of Governors who will advise the Safeguarding Supervisory Governor.

In cases of significant harm to a child, a member of staff may choose to inform the Police or Social Services immediately or the DSL will inform the Police and Social Services immediately. If the member of staff has done so already they should advise the DSL this action has already been taken so as to avoid duplication.

If the allegation or suspicion is about the conduct of the Headmaster, the concern should be reported to the Chair of Governors, who will notify the Safeguarding Supervisory Governor and the Designated Officer (LADO) whose details can be found in Appendix 1.

It is acknowledged however, that anyone can refer their concerns regarding an adult working with children to the Designated Officers (LADO) and Police directly.

Child abuse to be reported immediately to the DSL includes:

- Abuse of a child by a staff member or other adult
- Abuse at home, or by extended family members which a child reports to staff
- Abuse by a stranger or known adult outside school
- Abuse of a child by another child (peer on peer abuse)

It is not the responsibility of School staff to investigate suspected abuse. The School is not an investigation or intervention agency for child protection but it has an important role to play at the recognition and referral stages. The School will take into account the procedures published by Buckinghamshire Safeguarding Children Board when dealing with allegations of abuse.

On being notified of a complaint or suspicion of abuse, the action to be taken by the DSL will take into account:

- The local inter-agency procedures of the Buckinghamshire Safeguarding Children Board
- The nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to Children's Services and the police.
- The wishes or feelings of the pupil (KCSIE 2018). However, there may be times when the situation is so serious that a decision may need to be taken that, after all appropriate consultation, overrides a pupil's wishes.
- Duties of confidentiality, so far as applicable.
- Wider environmental factors that are present in a child's life that are threats to their safety and or well-being and any additional information that will contextualise any disclosure (KCSIE 2018)

If there is doubt over whether a referral should be made, the DSL will consult with the Children's Services First Response Team or Educational Safeguarding Advisory Service (ESAS – see Appendix 1) on a no-name basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to Children's Social Care will be made **within 24 hours**. If the initial referral is made by telephone, the DSL will confirm the referral in writing on a Multi-Agency Referral Form (MARF) to Children's Services within 24 hours. If no response or acknowledgement is received within one working day, the DSL will contact Children's Social Care again. If after a referral, the child's situation does not appear to be improving the DSL will press Social Care for re-consideration to ensure the child's situation improves.

The School's safeguarding procedures are not intended to prevent any person from making an immediate referral to Children's Social Care if there is a risk of immediate significant harm to a child or if they feel that the matter has not been dealt with appropriately by the DSL (KCSIE 2018). However, staff should follow School procedures in the first instance; all suspicions or disclosures of abuse are immediately referred to the DSL.

2. EARLY HELP & PUPIL WELFARE (KCSIE 2018, paras. 18-28)

All staff members are aware that should they have any concerns about a child they must refer such concerns to the DSL. On the basis of child disclosures or concerns identified that require early help, either because the child is recognised as having multiple needs, or because an individual concern is of significant magnitude, the DSL will ensure supportive interventions are in place to prevent issues from escalating.

In circumstances where a pupil has not suffered and is not likely to suffer significant harm, but is **in need of additional support in the form of early help services** from one or more agents (both within and beyond Stowe School), the DSL will liaise with the School's Safeguarding Team (School Medical Officers, DDSLs, Senior Nurse Manager and Counsellors). All Stowe staff are trained to be especially alert to the potential welfare concerns of pupils identified as Looked After, with Special Educational Need and Disability (SEND), who may be particularly vulnerable to safeguarding issues and abuse.

When **consent to share** confidential welfare information has been given, the appropriate pastoral staff and/or parents are also informed. The **best interests** of the child must always take priority and, under certain circumstances, this may mean parents and/ or pastoral staff are not told things confidentially disclosed by a child.

The DSL and Safeguarding Team ensure that the children's wishes and feelings are taken into account whilst decisions are made concerning suitable support. Children are asked for feedback (KCSIE 2018, para.91) on the support they are receiving from the DSL and provision is re-evaluated if appropriate. Ultimately, all safeguarding systems and procedures at Stowe School operate with the best interests of the children at their heart. The DSL monitors children accessing early help services and evaluates the level of appropriate support using the BSCB 'Thresholds Document - Accessing Services for Children in Buckinghamshire'.

The DSL will contact ESAS for advice on welfare cases where there is a concern that early help interventions have escalated beyond Level 1: Universal Services or Level 2: Additional Support.

Education Safeguarding Advisory Services (ESAS) Tel: 01296 382912

The DSL will always refer Level 3 (Section 17/Child in Need and Level 4 (Section 47/Significant Harm) cases to Social Services. In cases referred to Social Services, the child is placed on the **School Child Protection Register**.

2.1. CONFIDENTIALITY AND INFORMATION SHARING

This section should be read in conjunction with the Staff Code of Conduct Policy

It is imperative that information gained whilst discharging a pastoral responsibility as an employee of Stowe School is only ever to be disclosed on a ‘**need to know**’ basis. The DSL and Safeguarding Team will determine the extent of the information to be shared and identify staff who may ‘need to know’ sensitive welfare and child protection information. **Information should not be shared without prior consultation with the DSL.** The unnecessary discussion of any information about pupils is *prima facie* gossip; this is true even if the identities of the pupils with issues are not disclosed. Stowe School employees will thus be guarded in what they say in public about individuals and events at Stowe.

Anyone offering **confidentiality** to a child would be promising to keep the content of his or her conversation completely secret and discuss it with no one. Promises of confidentiality must not be made by ordinary staff members of the School whilst in contact with children. Everyone in the school community will know that **confidentiality** may only be offered by **particular individuals** within the School community: Medical Officers and Nurses at the Medical Centre, the School Counsellors and the Chaplain. However, **confidentiality will not be promised by these professionals if a child’s welfare is considered a safeguarding or child protection concern.**

Because a sense of trust is necessary if pupils are to seek help from teachers and others involved in their pastoral care, the School will **minimise the sharing** of information between School staff, restricting it to circumstances where it is needed to ensure a pupil’s wellbeing and safety.

The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and Children’s Services to ensure that all relevant information is shared for the purposes of child protection investigations under Section 27 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children 2018.

Parents will normally be kept informed as appropriate of any action to be taken under child protection procedures. However, there may be circumstances when the DSL will need to consult ESAS, Children’s Services, the police and/or the Headmaster before discussing details with them. In all circumstances, the welfare of the child is paramount. **Referrals to statutory agencies do not require parental consent.**

The 7 Golden Rules of Information Sharing

Advice for practitioners providing safeguarding services to children, young people, parents and carers from HM Government 2015

1. Remember that data protection legislation and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

3. SAFEGUARDING & CHILD PROTECTION: TYPES OF ABUSE

For a fuller list of Abuse or Safeguarding and CP issues see KCSIE 2018, Annex A.

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

Staff are trained to recognise that additional barriers can exist when identifying abuse and neglect in **children with Special Educational Needs and Disability (SEND), Looked After**. This can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability or circumstance without further exploration; children who are looked after or with SEND can be disproportionately impacted by bullying (without outwardly showing any signs); and can experience communication difficulties in covering these barriers.

All staff are trained during induction to be aware that abuse, neglect and safeguarding issues are rarely standalone events. In most cases, multiple issues will overlap with one another.

3.1. **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 illnesses in a child.

3.2. **FEMALE GENITAL MUTILATION (FGM):** Section 5B (11)(a) of the Female Genital Mutilation Act 2003 places a **statutory duty upon teachers to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. **Those failing to report such cases will face disciplinary sanctions.** Staff should also refer concerns or disclosures to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Services.

Contacts: Social Services First Response Team & Police (MASH) Tel: 0845 4600 001 or 01296 383962
Out of Hours Service Tel: 0800 999 7677.

The duty does not apply to girls at risk or suspected cases or where the girl is 18 or over. In these cases, teachers should follow local safeguarding procedures and report their suspicions to the DSL. All staff at Stowe School must be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM, with specific regard to our international children from countries known to practise FGM such as Kenya and Nigeria. There is a range of potential indicators that a child or young person may be at risk of FGM which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Warning signs and indicators that FGM may be about to take place, or may have already taken place, can be found in the Safeguarding section of StoweNet.

BREAST IRONING

Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts using hard or heated objects to try to stop them developing, or to make them disappear entirely.

Breast ironing is typically carried out by the girl's mother with the belief that she is:

- protecting her daughter from sexual harassment and / or rape;
- preventing the risk of early pregnancy, which would tarnish the family name;
- preventing her daughter from being forced into marriage, so she will have the opportunity to continue with her education.

This practice has been documented primarily in Cameroon, but is also practised in Guinea-Bissau, Chad, Togo, Benin and Guinea. While it is estimated that 3.8 million young women are vulnerable to breast ironing on a global scale, approx. one thousand 9 – 15 year old girls are currently thought to be at risk in the UK. According to the UN, 58% of perpetrators will be the victims' mother.

Breast ironing is extremely painful and can cause damage to the tissue. Other possible health implications include breast infections, the formation of abscesses, malformed breasts or the eradication of one or both breasts. The practice ranges widely in its severity, from using heated leaves to press and massage the breasts, through to using a scalding grinding stone to crush the budding gland. Due to the range of this activity, the short and long term health consequences for these young women vary from limited to significant.

While there is no specific law within the UK around Breast Ironing, it is a form of physical abuse.

- 3.3. **EMOTIONAL ABUSE:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectation 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 prevent the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- 3.4. **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 care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- 3.5. **DOMESTIC ABUSE:** Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it is not just physical violence – domestic abuse includes any emotional, physical, sexual, financial or psychological abuse. It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.

Domestic abuse may also be witnessed or experienced as part of a break-up of a marriage or partnership. In the most serious cases, safeguarding partners should be aware of the role and remit of Cafcass - Children and Family Court Advisory and Support Service – which represents children in family court cases in England. Children's needs, wishes and feelings are put first, making sure that children's voices are heard at the heart of the family court setting, and that decisions are made in their best interests. Operating within the law set by Parliament (Criminal Justice and Court Services Act 2000) and under the rules and directions of the family courts, Cafcass is independent of the courts, social services, education and health authorities and all similar agencies.

Cafcass' duty is to safeguard and promote the welfare of children going through the family justice system. Experienced Family Court Advisers may be asked by the court to work with families and then advise the court on what we consider to be the best interests of the children involved in three main areas:

- divorce and separation, sometimes called 'private law', where parents or carers can't agree on arrangements for their children
- care proceedings, sometimes called 'public law', where social services have serious concerns about the safety or welfare of a child
- adoption, which can be either public or private law.

Witnessing domestic abuse is child abuse and teenagers can suffer domestic abuse in their relationships. Domestic abuse can seriously harm children and young people. All suspected or disclosed incidents of domestic abuse must be reported to the DSL.

- 3.6. **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. In addition, child-on-child sexual violence or sexual harassment must be regarded as abuse regardless of the age or gender of the perpetrator.

3.7.

3.7.1. YOUTH PRODUCED SEXUAL IMAGES (Sexting): All members of staff are made aware during induction of how to recognise youth produced sexual imagery and their responsibility to refer any disclosures of incidents to the DSL immediately.

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). For the purpose of this policy, 'indecent' is defined as imagery that contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation. Indecent images may also include overtly sexual images of young people in their underwear. Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat, WhatsApp or Facebook Messenger.

The types of incidents involving youth produced sexual imagery are:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- a person under the age of 18 share sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

All incidents should be referred to the Headmaster / Senior Master / DSL immediately for an initial assessment. Parents / guardians will be informed at this stage unless there is good reason to believe that involving parents / guardians would put the young person at risk of harm. If at any point there is a concern a young person has been harmed or is at risk of significant harm, a referral will be made to Children's Social Care and/or the police immediately.

DSL / Senior Master / Headmaster- Initial Assessment:

An initial meeting of the staff identified above with the pupil will be held to discuss the best course of action. The meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or Children's Social Care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what series and/or platforms
- Whether immediate action should be taken to delete or remove images from devices or on-line series
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents/guardians of the pupils involved

Outcome of meeting:

An immediate referral to police and/or Children's Social Care will be made if at this initial stage:

- the incident involves an adult

- there is reason to believe that the young person has been coerced, put under pressure to produce the imagery, blackmailed or groomed, or if there are concerns about their capacity to consent (e.g. owing to **SEND** or other vulnerabilities)
- the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- the imagery involves sexual acts and any pupil in the imagery is under 13
- there is reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery, e.g. the young person is presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or Children's Social Care. The decision will be made by the DSL, Senior Master and the Headmaster and will be based on the consideration of the best interests of the young people involved. If at the initial review stage, a decision has been made not to refer to police and/or Children's Social Care, the DSL may conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

Informing Parents/Guardians

- parents will be informed of incidents from the outset. Any decision not to inform the parents will be made in conjunction with other services such as Children's Social Care and/or the police, who would take the lead in deciding when the parents/guardians should be informed
- the DSL will work with the young people involved to decide on the best approach for informing parents. In some cases, the DSL may work to support pupils to inform their parents themselves.

Viewing the Imagery

Staff should **not** view youth produced sexual imagery unless there is a good and clear reason to do so. The decision to view imagery will be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the child. If a decision is made to view imagery, the DSL will have considered the following:

- it is the only way to make a decision about whether to involve external agencies such as the police and Social Services
- it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- it is unavoidable because a pupil has presented an image directly to a staff member or the imagery found on a School device or network.

If it is deemed necessary to view youth produced sexual imagery, then the DSL will:

- never copy, print or share the imagery as this is illegal
- discuss the decision with the Headmaster / Senior Master
- ensure viewing is undertaken by the DSL and Headmaster/Senior Master
- the School will record that the imagery has been viewed in the School's safeguarding records, including who was present, why the image was viewed in and any subsequent actions.

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (e.g. ICT staff), the DSL will ensure that the staff member is provided with appropriate support. The School will record the circumstances in which the image was seen,

making note that this was unavoidable and record what support was offered to staff. This information will be part of the overall information kept related to the concern. Viewing youth produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

Deleting of Imagery

If the school has decided that no referral will be made to an external agency, imagery must be deleted. The pupils involved will be asked to delete imagery and to confirm that they have deleted the imagery. Pupils will be asked to delete all images across all devices, online storage or social media sites and their parents are informed of the request. Pupils involved will be reminded that possession of youth produced sexual imagery is illegal and will be informed that if they refuse or it is later discovered they did not delete the image(s), they are committing a criminal offence and the police may become involved. The school will record that it requested, and witnessed the deletion of images (to the best of its ability given the access at the time to devices). It should also record any confirmation given by the student(s) and parents involved that the request has been completed.

Pupils involved in producing, sharing and distributing sexual imagery will be subject to the School's disciplinary procedures as outlined in the Pupil Behaviour Policy.

3.6.2 CHILD SEXUAL EXPLOITATION (CSE): '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'.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. 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 wellbeing
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education.
- children who may be involved in an abusive relationship, intimidated and fearful of certain people or situations
- children who hang out with groups of older people, or anti-social groups, or with other vulnerable peers

At Stowe School, staff should be alert to the understanding that sexual exploitation can take many forms, even seemingly 'consensual' relationship where sex may be exchanged for affection or gifts. What marks out **exploitation** is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-

bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. If staff harbour any doubts about whether grooming has/is occurring they should inform the DSL immediately.

The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified. Children may:

- be very secretive, including about what they are doing online
- have older boyfriends or girlfriends
- go to unusual places to meet friends
- have access to drugs and alcohol

They may also show signs of sexual abuse or grooming, including online. When sexual exploitation happens online, young people may be persuaded, or forced, to:

- send or post sexually explicit images of themselves
- take part in sexual activities via a webcam or smartphone
- have sexual conversations by text or online.

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped.

3.8. PEER ON PEER ABUSE (Managing allegations against other children)

Stowe School will minimise the risk of allegations against other pupils by:

- providing a developmentally appropriate PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe.
- having systems in place for any pupils or parents to raise concerns with staff; knowing that they will be listened to, believed and valued.
- providing interventions and peer support to those pupils identified as being at risk.
- developing robust risk assessments and providing targeted interventions for pupils identified as being a potential risk to other pupils.

Should an allegation be made by a pupil against another pupil, staff must consider whether the disclosure raises safeguarding and child protection concerns. If one child causes harm to another this will not necessarily be dealt with as **abuse**: bullying, fighting and harassment between children are not generally child protection issues and their behaviour will be dealt with under the School's discipline policies.

ABUSE IS ABUSE and so the School recognises that children are vulnerable to abuse from their peers: such abuse will be taken as seriously as abuse by an adult, it will not be dismissed as 'part of growing up', 'banter', 'just having a laugh', 'part of growing up or learning to 'man up'. Such abuse will be subject to the same child protection procedures (KCSIE 2018, para.90) and all peer on peer allegations of a safeguarding and child protection concern **must be referred to the DSL immediately.**

It is likely that such allegations will feature some of the following and therefore it may be appropriate to regard a young person's behaviour as abusive if:

- there is a difference in power (e.g. **age, gender, size, intellect, development / SEND**) between the young people concerned
- the perpetrator has **repeatedly** tried to harm one or more children
- there are concerns about the **intention** of the alleged perpetrator (e.g. the acts could be considered exploitative)
- it is of such a serious nature that it is possibly a **criminal offence**.

If the evidence suggests that there was an intention to cause significant harm to the victim, this should be regarded as abusive whether or not significant harm was actually caused. Additionally, high frequency and persistence of abusive acts are strong indicators of abuse; an identifiable pattern of abusive behaviour or 'modus operandi' by the perpetrator will increase the likelihood of such action to be defined as abuse.

Staff must be alert to the gendered nature of peer on peer abuse; safeguarding issues may include physical, emotional and sexual abuse and/or exploitation. Stowe School staff must be alert to peer on peer abuse, or inappropriate pupil relationships especially where there is a gender imbalance in school intake, as at Stowe.

Examples of safeguarding and child protection issues made by a pupil against another may include:

- **Physical Abuse:** Aggression, coercion, violence and threats of violence (particularly pre-meditated), 'Hazing'; the practice of rituals and other activities involving harassment and/or humiliation used as a way of initiating a person into a House/group/team. Forcing others to use drugs or alcohol.
- **Emotional Abuse:** Blackmail, bribery or extortion, threats, intimidation and harassment including online. Targeted children may feel persistently frightened or in danger, anxious, in discomfort and/or humiliated. Attempts may be made by the perpetrator to ensure secrecy or dismiss repeated verbal abuse as 'banter'.
- **Sexual Abuse and/or exploitation:** Indecent exposure and/or touching e.g. breast/bottom or sexual assaults and harassment. Exposing genitals or masturbating in public, sexual degradation, humiliation, of self or others. Photographing/recording or forcing other children to perform/watch indecent acts. Force, coercion and/or potential grooming activities involving indecent images, 'sexting' and/or use of sexual language which is offensive or makes explicit sexual suggestions and/or cyber-sexual bullying involving aggression.

For Child on Child sexual violence and sexual harassment, see KCSIE 2018, Part 5, paras. 235-257.

It is not the responsibility of School staff to investigate suspected abuse. The School is not an investigation or intervention agency for children protection but it has an important role to play at the recognition and referral stages. The School will take into account the procedures published by Buckinghamshire Safeguarding Children Boards when dealing with allegations of peer on peer abuse.

Procedure (for full flowchart of actions, see KCSIE 2018, p.13):

- **any peer on peer disclosure must be referred to the DSL immediately. Staff have now fulfilled their duty and should not take any further action or reveal information to anyone else. The DSL is aware that staff may need support following a disclosure.**
- **peer on peer disclosures will be managed by the DSL on a case-by-case basis.**
- the DSL will immediately inform the **Headmaster** where a child protection concern regarding peer on peer abuse has been disclosed.
- a factual record of the allegation will be sought by the DSL.

- pastoral staff may be informed of the disclosure on a 'need to know' basis.
- the DSL may seek medical support and assessment on behalf of the victim from the School's Medical Officer/Senior Nurse.
- the DSL will seek advice and guidance from the **Buckinghamshire ESAS team**. The DSL will follow through the outcomes of the discussion and make a referral to **Children's Social Services** as appropriate if there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.
- the parents of both pupils will be informed and kept updated on the progress of the investigation as appropriate
- the pupil who made the allegation will be informed of what the next steps will be.
- where a crime has been committed and in cases of significant harm the **DSL will contact the Police**.
- the School is aware that a child who has harmed another may also be a victim of abuse, **both parties whether victim or perpetrator will be considered 'at risk'**. However, the priority is the protection of the victim and potential future victims. The School will ensure that the victim or a pupil who has given information about an abuse is protected from **reprisal, intimidation or peer pressure** following a disclosure of peer abuse.
- it may be necessary to remove the perpetrator from boarding if they pose a risk of harm to other children. If circumstances arise that mean that a child cannot immediately be collected from the school on request of the Headmaster, by a parent/guardian, they will either be accommodated securely in the medical centre or off site with a vetted, appropriate adult.
- there will usually be a school disciplinary response to unacceptable behaviour in order to safeguard and protect the wellbeing of other pupils.
- the victim will be protected and supported during and after an allegation is made. A referral to counselling, medical services and/or peer support (PSG) may be made.
- the perpetrator will be provided with support to prevent any reoccurrence of inappropriate behaviour and to address the cause.
- the DSL will maintain a record of the concern, decisions made and outcomes.
- both pupils will continue to be monitored and evaluated by the Housemaster/mistress and DSL.

3.9. CHILDREN MISSING EDUCATION

This section should be read in conjunction with the Missing Pupil Policy and Child Missing Education Policy which are based on the BCSB Protocol for Children Missing Education (Version 9 (Sept. 2017); review in September 2018) and Children Missing Education (Statutory Guidance of September 2016) .

If teachers suspect that a child is missing from education (e.g. a child is absent without satisfactory reason, or leaves school suddenly without good reason), they should speak to the DSL. The DSL will check the admission and attendance registers regularly to look for patterns. The School checks that children have started at their new establishment after they leave Stowe School with the new school/establishment. The School will notify the local authority within 5 days when any child leaves or joins the School at a non-standard transition point or after 10 School days of continual absence. Any child deemed to be missing from education is reported to the local authority through the Children Missing Education Team – 01296 383098 or email: childrenmissingeducation@buckscc.gov.uk

3.9 ONLINE SAFETY

This should be read in conjunction with KCSIE 2018 Annex C, Acceptable Usage Policies, the Digital Safety Policy, The Staff Handbook and Staff Code of Conduct.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying

Education

Opportunities to teach safeguarding, including online safety, are taken in the PSHE classes and through pastoral meetings with pupils and parents.

DSL & DDSL training

- The DSL should go through online safety specific training and have an “up-to-date capability required to keep children safe whilst they are online” (see KCSIE 2018, Annexes B & C).
- DDSLs should be in line with DSL re online safety specific training and setting out that role should be explicit in any job description.

Filters and monitoring

The School limits children’s exposure to the above risks from the School’s IT system through a filtering and monitoring system. Breaches of the filtering and monitoring walls are reported to ICT, the DSL and the Second Master. Whilst filtering and monitoring are an important part of the online safety picture for the School to consider, it is only one part. We have a whole school approach to online safety which includes a clear policy on the use of mobile technology in the School. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and we insist that parents must sign the Parents’ Acceptable Usage Policy which confirms they curtail pupils’ phone use by using the phone’s inbuilt restrictions. We also have School rules in the Blue Book and the School reserves the right, where there is reasonable suspicion of a disciplinary offence, to inspect and monitor the use of mobile phones.

We ensure that appropriate filters and monitoring systems are in place and are careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Staff training

Governors and Head of IT ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training (para. 76) and the requirement to ensure children are taught about safeguarding, including online (para. 80), online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

3.10 CHILD CRIMINAL EXPLOITATION: COUNTY LINES

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

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence

- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

3.11 CONTEXTUAL SAFEGUARDING

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered. Assessments of children in such cases should consider whether wider environmental factors are present in a child's life and are a threat to their safety and/or welfare. Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare. Interventions should focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to local authority children's social care. Assessments of children in such cases should consider the individual needs and vulnerabilities of each child. They should look at the parental capacity to support the child, including helping the parents and carers to understand any risks and support them to keep children safe and assess potential risk to child.

3.12 LOOKED AFTER CHILDREN (see KCSIE 2018, Part 2, paras. 93-99).

3.13 PREVENTING RADICALISATION –THE PREVENT DUTY (see KCSIE 2018, Part 1 Annex A).

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk is a part of the School's safeguarding approach. We also acknowledge the importance of the Buckinghamshire Partnership Board document – "Prevent Strategy (January 2016 – December 2018)" as the Prevent agenda is not new to Buckinghamshire. The DSL has undertaken Prevent training (April 2018).

Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or deputy) making a referral to the Channel programme.

The Prevent duty

All schools and colleges are subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty is part of the School's wider safeguarding obligations, so the DSL and other senior leaders should familiarise themselves with the Revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76 which are specifically concerned with schools (and also covers childcare).

3.14 ADDITIONAL SAFEGUARDING ISSUES to which all staff must also be alert (see KCSIE 2018, Annex A for further details and guidance / advice) and which should be referred to the DSL include:

- mental health issues (see Pupil Mental Health and Wellbeing Policy)
- bullying, including cyber-bullying (see Anti-Bullying Policy)
- teenage relationship abuse (see RSE policy)
- substance abuse: Drugs and Alcohol
- fabricated or Induced Illness
- faith abuse and hate
- forced marriage
- honour-based violence (HBV). If staff harbour any doubts about whether grooming has/is occurring they should inform the DSL immediately.
- trafficking
- private fostering
- gangs and youth violence
- County Lines: criminal exploitation of children
- gender-based violence/violence against women and girls (VAWG)

4. SIGNS OF POSSIBLE ABUSE

The NSPCC (2015) lists some of the signs and behaviour which may indicate that a child is being abused as:

- significant changes in children's behaviour
- deterioration in children's general well-being
- unexplained bruising, marks or signs of possible abuse or neglect
- children's comments which give cause for concern
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or inappropriate behaviour displayed by other members of staff e.g. excessive one to one attention beyond usual role or responsibilities
- repeated minor injuries
- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums etc.
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'
- sexually explicit behaviour e.g. playing games and showing awareness which is inappropriate for the child's age
- a child who is reluctant to go home, or who is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- 'stomach pains' with no medical reason
- eating problem, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour

- depression, withdrawal
- relationships between child and adults which are secretive and exclude others.

These signs are not evidence themselves, but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. **Abuse is not easy to diagnose, even for experts. Staff must familiarise themselves with the signs and symptoms of all types of abuse which are listed in further details on the Safeguarding and Child Protection Section of Stowenet. Best advice is that if any staff are in doubt whether abuse is occurring it is best that they act on that concern and inform the DSL who will investigate, rather than say nothing and leave a child at risk of harm.**

5. CHILD DISCLOSURE

Children experiencing abuse or a need for support may approach any staff member **directly**. Staff should be aware that children may disclose **indirectly**; a child may choose to disclose concerns through art, drama, poetry and writing or a third party e.g. a friend 'telling' on their behalf.

All child disclosures of a safeguarding and child protection concern must be referred to the DSL immediately.

If a child chooses to confide in a member of staff, the member of staff should:

- think carefully about the setting in which a disclosure conversation takes place. There needs to be a degree of privacy, but the setting should be one where you and the child can be casually overlooked by people passing
- be accessible and receptive; do not react in shock, anger or horror
- listen carefully to what is said and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place
- take what is said seriously; do not speculate or accuse anybody
- reassure the child that they are not to blame and are right to tell
- ask only open questions such as
 - How did that happen?
 - What was happening at the time?
 - Anything else you want to tell me?
- **timescales are very important:** 'when was the last time this happened?' is an important question
- **never ask closed questions** i.e. ones that children can answer yes or no to e.g. Did he/she touch you?
- **DO NOT ask leading questions** which may be considered as suggesting what might have happened, or who has perpetrated the abuse, as this can later be interpreted as putting ideas into the child's mind.
- use only 'minimal prompts' such as 'go on....tell me more about that...tell me everything you remember about that...' **DO NOT** complete sentences when the child is too upset to speak or summarise what you have heard. If the child is so distressed that the disclosure is incoherent, you may ask the child to repeat something or put it another way, but that is all: everything in the disclosure must come from the child.
- **never investigate or seek to prove/disprove possible abuse;** do not jump to conclusions or offer opinions, nor confront another adult or child who is allegedly involved
- **be prepared to answer the 'what happens next' question:** tell the child that you must pass this information on and to whom; but that decisions will not be made without their input. Reassure the child that they have not 'lost control' of what will happen next by speaking out. You may wish to use phrases such as: 'I'm sorry, I can't promise to keep a secret but *I can promise you this* – we will talk about what happens next. I will need to pass on what you have to tell me, but *I promise* I will tell you what I am going to do and why.'
- **never give an understanding of absolute confidentiality to a child or offer to 'keep secrets':** breaking a child's confidence would be inappropriate, all Stowe pupils are aware that you will have to tell the DSL who will ensure the correct action is taken

- make a careful record (after the child has left) of what was said; using the child's words and phrases.
- records should
 - be accurate and descriptive and submitted to the DSL on the Child Protection Concern Form
 - not make assumptions
 - not include any opinions
 - indicate sources of information
 - be clear and concise
 - be signed by the person making it and use names, not initials, be kept securely and handed/mailed to the DSL within 24 hours.
- all evidence; e.g. scribbled notes, child drawings, artwork, poems, mobile phones containing text message, clothing, computers, must be safeguarded and preserved and passed to the DSL.
- **the disclosure must not be discussed with anyone: parents, staff or pupils (not even a spouse or partner).**
- **the DSL will support the child and liaise with external agencies as appropriate.**
- **the DSL and/or Counsellors will be available to support staff following a disclosure.**

6. DESIGNATED SAFEGUARDING LEAD (DSL)

The Governing Body and Headmaster have appointed Crispin Robinson (Second Master) as the senior member of staff on the Executive Leadership Team (ELT) to the role of **Designated Safeguarding Lead. The DSL has the appropriate status and authority to fulfil the role and is responsible for all matters relating to safeguarding, pupil welfare and children protection at Stowe School.** In the absence of the DSL, there are two deputies (DDSL) – in the first instance Louise Springall (Senior Counsellor) and then the Headmaster both with the status and authority to fulfil the duties held by the DSL. The School acknowledges that whilst the activities of the DSL can be delegated to an appropriately trained deputy, **the ultimate lead responsibility for child protection remains with the DSL**; this lead responsibility should not be delegated. The School will ensure that the DSL is given the time, funding, training, resources and support to enable them to support other staff on safeguarding and child protection matters, to contribute to strategy discussion and/or inter-agency meetings and to contribute to the assessment of children.

Parents are welcome to approach the DSL if they have any concerns about the welfare of any children in the School, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's Housemaster / Mistress who will notify the DSL in accordance with these procedures. A separate job description for the role of DSL and DDSL is available on StoweNet.

In accordance with KCSIE 2018 Annex B, the main responsibilities of the DSL are:

Managing Referrals

- take lead responsibility for promptly referring all cases of serious welfare concerns (section 17) and refer cases of suspected abuse (section 47) to Children's Social Care as required
- refer cases to the Channel programme where there is a radicalisation concern, as required
- support staff who make referrals to local authority Children Social Care and/or to the Channel Programme
- take lead responsibility for promptly making referrals to the Disclosure and Barring Service (DBS) (PO Box 3961, Royal Wootton Bassett, SN4 4HF) where a member of staff or volunteer is missed or resigns in circumstances where there has been actual harm, or risk of harm, to a child
- take lead responsibility for promptly making referrals to the Police where a crime may have been committed

Work with others

The DSL is expected to:

- liaise with the Headmaster to inform him of issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations
- as required, liaise with the 'case manager' and the designated officers for child protection concerns (all cases that concern a staff member); and
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for all staff

Training

In addition to formal training (Section 11 of this policy), the knowledge and skills of the DSL and DDSL will be refreshed at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention
- have a working knowledge of how the local authority conducts a children protection case conference and a child protection review conference and are able to attend and contribute to these effectively when required to do so.
- 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
- are alert to the specific needs of children in need, those with special educational needs and young carers
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- obtain access to resources and attend any relevant and/or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise Awareness

The DSL should:

- ensure the School's Safeguarding & Child Protection Policy is known, understood and used appropriately
- ensure the School's Safeguarding & Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this
- ensure the Safeguarding & 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
- link with the BSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child Protection File

Stowe School sends a letter of request for welfare and children protection records for all new pupils, within the first week of admission. Where a child leaves Stowe, the DSL will ensure the child protection file is transferred to the new school or F.E. College as soon as possible. This will be transferred

separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. Where an incident has taken place, the School will keep a copy of the file.

Availability

During term time, the DSL will always be available during the school day for staff to discuss any safeguarding concerns. The DSL is resident offsite and whilst, generally speaking, the DSL will be available in person for much of the day, in exceptional circumstance availability via phone or other such media may be necessary. The Headmaster as DDSL is resident on site and available outside office hours.

During the School Exeats, Half Terms and vacations, the DDSLs and DSL are on holiday but in emergencies are available by the mobile phone or email.

7. ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF / VOLUNTEERS / THE HEADMASTER OR GOVERNORS

The School has procedures for dealing with allegations of abuse against staff (including the Headmaster), Governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from malicious, false, unsubstantiated or unfounded allegations. Detailed guidance is given to staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Stowe Staff Codes of Conduct and includes details of additional safeguarding arrangements where staff engage in one-on-one teaching and meetings with pupils. The School's separate Whistleblowing Policy sets out the procedure for reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children.

The full Stowe Policy and Procedures for allegations of abuse (KCSIE 2018, Part 4, paras. 184-234) is available on Stowenet. Any allegation against a member of staff, or any volunteers who work with children, or the Headmaster or a Governor must be reported **immediately** in accordance with the procedures set out below.

These procedures will be used where the member of staff, volunteer, the Headmaster or Governor has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child;
- behaved in a manner that falls below professional standards expected of staff or as outlined in the school's code of conduct or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children.

Any allegations not meeting these criteria will be dealt with in accordance with the Buckinghamshire Safeguarding Children Board procedures. Advice from the Designated Officer will be sought in borderline cases.

Reporting allegations against staff, the Headmaster, Governors or volunteers:

- where an allegation or complaint is made against any member of staff, a volunteer or a Governor, the matter must be reported immediately to the Headmaster or DSL.
- if the allegation involves the Headmaster, the Chair of Governors must be contacted without notifying the Headmaster first.
- where an allegation is made against the DSL, the matter must be reported immediately and directly to the Headmaster.

The Designated Officer will be informed of allegations that come to the attention of the School or that are made directly to the police as soon as possible, within one working day. It is the responsibility of the Headmaster or Chair of Governors, as appropriate, to report the matter to the Designated Officer and to act in accordance with any strategy formulated by the relevant agencies. In cases of serious harm, the police will be

informed from the outset. All allegations will be discussed with the Designated Officer before further action is taken and this discussion will be recorded in writing.

The person with responsibility for contacting the Designated Officer in accordance with the procedures described above is known as the 'case manager'.

Disclosure of Information: The case manager will inform the accused person of the allegation as soon as possible after the Designated Officer has been consulted. The parents or carer of the child(ren) involved will be informed of the allegation as soon as possible. *If the member of staff for which an allegation has been made resides on the school site or in boarding accommodation, alternative arrangements will be made to accommodate the staff member off-site, for the duration of the investigation.* The 'case manager' will seek assurance from the Designated Officer before allowing the staff member to resume teaching duties at the school or re-enter boarding/on-site accommodation.

Where the Designated Officer advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the case manager should not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed. The parents or carers should be kept informed of the progress of the case, including the outcome of any disciplinary process. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

Further action: The School has a duty of care towards its employees and as such, it will ensure that effective support is provided for anyone facing an allegation. The school will take action in accordance with Part Four of 'Keeping Children Safe in Education' (2016/2018).

Ceasing to use staff: If the School ceases to use the services of a member of staff (or a Governor, or volunteer) because he or she is unsuitable to work with children, a settlement/compromise agreement **will not be used**. The DSL will make a referral to the Disclosure and Barring Service as soon as possible, if the criteria are met. Where a referral is made to the DBS [DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF – 03000 200 190], a separate referral will also be made as soon as possible to the Teaching Regulation Agency (TRA) in cases of serious professional misconduct. Any such incident will be followed by a review of the Safeguarding procedures within the School, with a report being presented to the Governors without delay.

Resignation: If a member of staff (or a Governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will be followed up by the School in accordance with this policy and a referral will be made by the DSL to the Disclosure and Barring Service [DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF – 03000 200 190], as soon as possible. If the criteria are met, a separate referral will also be made as soon as possible to the Teaching Regulation Agency (TRA) in cases of serious professional misconduct.

Where a teacher has been dismissed or would have been dismissed had he/she not resigned, in circumstances where the threshold for a DBS referral has not been met, separate consideration will be given as to whether the matter should be referred to the Teaching Regulation Agency (TRA). This will include matters where there has been unacceptable professional conduct, conduct which may bring the teaching profession into disrepute, conviction at any time of a relevant offence or where a prohibition order may otherwise be appropriate.

When considering the most appropriate course actions in these circumstances the school will, where deemed necessary, seek advice/guidance from relevant external agencies including, but not exclusively, the Designated Officer, Police, Unions the DBS Services and the Teaching Regulations Agency.

Unsubstantiated, false or malicious allegations: Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's Pupil Behaviour Policy.

Where a parent has made a deliberately invented or malicious allegation, the Headmaster will consider whether to require that parent to withdraw that child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

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

Record Keeping: Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of ten years from the date of the allegation, if this is longer, unless the allegation was proven to have been false, unsubstantiated or malicious, in which case it will not be referred to in any reference. Allegations found to be malicious will be removed from personnel records.

8. SAFER RECRUITMENT

To be read in conjunction with the Safer Recruitment Policy.

The School follows the Government's recommendations (KCSIE 2018, Part 3, paras. 106-179) for the safer recruitment employment of staff who work with children.

The School will ensure that assurance is obtained of appropriate child protection checks and procedures having been applied to any staff employed by another organisation and working with the School's pupils on another site.

9. SITE SECURITY

The School will take all practical steps to ensure that School premises are as secure as circumstances permit. Where services or activities are provided by an external organisation using the School's facilities and premises, the SEL events manager will seek assurance that the client/organisation concerned has appropriate safeguarding and children protection policies and procedures in place (see SEL document, 'Safeguarding and Child Protection: Information for Hirers').

All staff employed by Stowe School are required to wear an identity badge at all times. Visitor's books are kept at the Main School Reception / Contractor's & Maintenance Reception / Chung Music School Reception and all visitors / contractors are required to produce legal ID, sign in on arrival and sign out on departure and will be escorted whilst on the School premises at all times by a member of staff or appropriately vetted volunteers. All visitors will be given the Safeguarding and Child Protection '*aide-memoire*' and visitor leaflet. In addition, all visitors / contractors are given a name badge with the title 'Visitor' which must be clearly worn at all times and displayed on contracted vehicles whilst on the School premises.

10. VISITING SPEAKERS

To be read in conjunction with the School's Visiting Speakers policy

All prospective visiting speakers must be approved by the Headmaster, Second Master or Senior Master. The school takes seriously its safeguarding duties under section **29 of the Counter-Terrorism and Security Act 2015: 'Prevent Duty'** to vet the suitability of adults who will be speaking to impressionable young people.

11. SAFEGUARDING & CHILD PROTECTION TRAINING

All training will be carried out in accordance with Buckinghamshire Safeguarding Children Board procedures. The DSL and the DDSLs attend formal safeguarding and Child Protection training courses and training on inter-agency working at least every two years, with a refresher course annually.

All staff, including temporary staff, governors and volunteers, will be provided with safeguarding induction training **within the first week of employment and, if necessary, e/hard copies of statutory policies and procedures (the Procedures and Policies) booklet** that includes:

- a. This policy
- b. Stowe Behaviour & Discipline Policies
- c. The identities, roles and contact details of the DSL/DDSL
- d. The 'Stowe School Safeguarding & Child Protection Referral Pathway' and 'Safeguarding and Child Protection as part of the Procedures' booklet
- e. Child Missing from Education Policy
- f. The Staff Code of Conduct and the Whistleblowing Policy
- g. KCSIE 2018 (Part 1 and Annex A)

The purpose of this induction training is to ensure that staff understand the School's safeguarding procedures and policy and that they have an up to date knowledge of safeguarding issues. This will include, amongst other content: types of abuse including the risks of radicalisation and identification of children at risk; e-safety; whistleblowing; staff conduct and training to enable staff to identify signs of abuse and a child who may be in need of early help. All staff, including the Headmaster and Governors, receive a copy of KCSIE 2018 Part 1 & Annex A and are required to confirm in writing that they have read and understood it.

Further safeguarding training covering statutory updates, managing disclosures, radicalisation, recognising abuse and specific safeguarding issues (KCSIE 2018) is provided by the DSL to all staff at least annually and as required. In addition, all academic and pastoral staff complete safeguarding and children protection modules through the School's online training package (EduCare) as part of their performance review and CPD, as monitored by the Deputy Head (Pastoral). All new academic and pastoral staff must complete the certificated module on the Prevent Duty as part of their induction.

At least every three years, the School will ensure that the Headmaster, all staff members, volunteers and governors undertake safeguarding and child protection refresher training.

12. MONITORING

The Governing Body will ensure that all staff and volunteers are aware that it is their responsibility to:

- Refer all welfare concerns and child disclosures to the DSL
- Protect children from abuse
- Be aware of the School's safeguarding and children protection procedures outlined in this policy
- To know how to access and implement the procedures, independently if necessary
- Include the DSL in matters of concern regarding staff conduct
- Undertake appropriate training, including refresher training which will be updated every two years in accordance with the Buckinghamshire Safeguarding Children Board's requirement.

Any child protection incidents at the School will be followed by a review of the safeguarding procedures with the School by the DSL. Where an incident involves a member of staff, the DSL will assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

Mrs Joanne Hastie-Smith is the **nominated School Governor**, with responsibility for Safeguarding. Mrs Hastie-Smith can be contacted via Annabel Lovelock, the School Administrator and Clerk to the Governors (Email: alovelock@stowe.co.uk Tel: 01280 818109). Mrs Hastie-Smith will monitor and review annually, with the DSL, the implementation of the Safeguarding Policy and draw the attention of the Headmaster and Governing Body to any deficiencies identified for further attention. The nominated School Governor is designated to take a lead in relation to responsibility for safeguarding arrangements, however the oversight of safeguarding policy and procedures remains the responsibility of the full Governing Body of Stowe School.

The full Governing Body will annually review this policy and the implementation of its procedures.

This policy is considered a 'live' document and will be updated as statutory guidance is released.

Signed by:

S Creedy Smith
Chair of the Governors

J Hastie-Smith
Nominated Safeguarding Governor

A K Wallersteiner
Headmaster

C C Robinson (electronic signature)
Designated Safeguarding Lead

Appendix

Key Local Area Contacts

FOR ALLEGATIONS AGAINST ADULTS WORKING WITH CHILDREN

- **Local Authority Designed Officers (LADO)**
Email: secure-LADO@buckscs.gov.uk
Tel: 01296 382070
- **Headmaster: Dr Anthony Wallersteiner**
Email: awallersteiner@stowe.co.uk
Tel: 01280 818240
- **Chair of Governors: Mr Simon Creedy-Smith**
(via School Administrator & Clerk to the Governors: alovelock@stowe.co.uk)

FOR CHILDREN IN NEED OR AT RISK OF SIGNIFICANT HARM

- **Child Social Services & Police First Response Team (MASH)**
Email: cypfirstresponse@buckscs.gov.uk
Secure-cypfirstresponse@buckscs.gov.uk
Tel: 0845 4600 001/01296 383962
- **Out of Hours Service**
Tel: 0800 999 7677
- **Family Resilience**
Tel: 0845 4600 300