

Stowe School

Safeguarding & Child Protection Policy



'It could happen here'
(Keeping Children Safe in Education)

This school policy will be made available to parents on the Stowe School website and hard copies will be available from the Headmaster's office on request.

Author: KJ McLintock/ Designated Safeguarding Lead
Authorised by Resolution of: GOVERNING BODY

Version:

V.1 21st November 2014

V1.1 17th April 2015; following publication of Keeping Children Safe in Education (March 2015) and Working Together to Safeguard Children (March 2015).

V1.2 2nd September 2015; following updated statutory guidance Keeping Children Safe in Education (July 2015).

V1.3 5th September 2016; following updated statutory guidance Keeping Children Safe in Education (Sept 2016).

Annual Review: 21st November 2016

STATEMENT OF PRINCIPLES

This policy has been written in accordance with Buckinghamshire Safeguarding Children Board inter-agency procedures (Buckinghamshire Multi-Agency Information Sharing for Children, Young People &

Families – Code of Practice for sharing personal information, March 2015). **The School fully accepts its obligations under 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 responsibilities to **safeguard and protect** the welfare of children (Children Act 1989 & 2004, Education Act 2002, The Education (Independent School Standards) Regulations 2014 and to **promote** the welfare of Children (Education Act; section 157, 2002).

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

- Recruitment Policy
- Missing Pupil Policy
- Visiting Speakers Policy
- Contractors Policy and Procedures
- Whistleblowing Policy
- Staff Conduct Policy
- Anti-Bullying Policy
- Pupil Behaviour Policy
- Pupil Mental Health & Wellbeing Policy
- Sex and Relationships Education Policy (SRE)
- Equality Policy
- E-Safety Policy
- Pupil Restraint Policy
- Off-Site Activity Policy

Stowe School's **Designated Safeguarding Lead (DSL)** is Kirsten McIntock, Head of Pupil Welfare, **contactable on: 07747 786564** and the **Deputy Safeguarding Lead** is Crispin Robinson, Second Master, contactable on: 01280 818344. **If a member of staff or volunteer suspects that a child is in immediate danger or at risk of significant harm they must inform the School's Designated Safeguarding Lead immediately.** If staff members have any other **welfare concerns** about a child, they must follow the Schools' Safeguarding and Child protection procedures and refer the matter to the DSL. It is acknowledged however 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 contact details are:

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

Out of Hours Service Tel: 0800 999 7677

For allegations against staff or volunteers, our Designated Officer (LADO) should be contacted on:

Name: Bridget Day

Email: bday@buckscs.gov.uk

Tel: 01296 382070

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' (2015) and of the requirements of 'Keeping Children Safe in Education' (Sept 2016). Stowe School recognises 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. 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; Sept 2016)

It is understood that 'children' includes everyone **under the age of 18**.

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 this policy and safeguarding procedures, are known and understood by those within the School community.

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

There are four 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) as referenced in KCSiE (2016). 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, House handbooks and the Blue diary
- c. Regular and thorough training of all School staff, enabling 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 review of safeguarding policy and procedure by the School
- e. The School will ensure that **safe recruitment practices** in line with 'Keeping Children Safe in Education' (2016) are ***always*** followed for:
 - i. all staff employed by the School
 - ii. all volunteers
 - iii. all contractors' staff
 - iv. all trainee teachers
 - v. all Governors

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 (2016). Full details of the School's safe recruitment procedures are set out in the *Recruitment Policy* published by the School's Human Resources Department on StoweNet.

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 Educational 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 **within the first week of employment** that explains the Schools' Whistleblowing Policy, Anti-Bullying Policy, E-Safety Policy, SRE policy, Staff Conduct Policy and KCSiE (2016) Part One and Annex A, alongside this Safeguarding and Child Protection Policy and role of the DSL.

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. All newly appointed staff will be informed of the School *Whistleblowing Policy*. This 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 has neither resulted 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 the same day to the Designated Safeguarding Lead or, in their absence, to the Deputy Designated Lead. The Headmaster will inform the Chairman and the Safeguarding Supervisory Governors immediately. ***In cases of significant harm, the police and Social Services will be informed immediately.***

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

Child abuse to be reported immediately to the Designated Safeguarding Lead includes:

- Abuse of a pupil by a staff member or other adult
- Abuse at home which a pupil reports to staff
- Abuse by a stranger or known adult outside school
- Abuse of one pupil by another pupil

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 Designated Safeguarding Lead will take into account:

- a. The local inter-agency procedures of the Buckinghamshire Safeguarding Children Board
- b. The nature and seriousness of the suspicion or complaint. A complaint involved a serious criminal offence will always be referred to Children's Services and the police
- c. The wishes or feelings of the pupil (KCSiE 2016). However, there may be times when the situation is so serious that a decision may need to be taken, after all appropriate consultation, that override a pupil's wishes
- d. Duties of confidentiality, so far as applicable

If there is doubt over whether a referral should be made, the Designated Safeguarding Lead will consult with Children's Services First Response Team or ESAS (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 Designated Safeguarding Lead will confirm the referral in writing to Children's Services within 24 hours. If no response or acknowledgement is received within one working day, the Designated Safeguarding Lead 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 2016). However, staff should follow School procedures in the first instance; all suspicions or disclosures of abuse are immediately referred to the DSL.

The Governing Body has nominated two of its members to monitor safeguarding policy and procedure on behalf of the Governing Body and to liaise with the DSL. The nominated two Safeguarding Supervisory Governors are Mrs Joanne Hastie-Smith and Canon Ackroyd. The board level lead for Stowe School is the Chair of Governors, Mr Simon Creedy-Smith; who takes **leadership** responsibility for the Schools' safeguarding arrangements. The Safeguarding Supervisory Governors will review the Safeguarding procedures and policies using the School's Safeguarding and Child Protection audit and formally report to the Governing Body annually.

2. EARLY HELP and PUPIL WELFARE

Since 1989, the Children Act has imposed duties on local authorities where the school is located towards both children in need (section 17) and children at risk (section 47). In addition *Keeping Children Safe in Education (2016)* also states that: 'All school and college staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life.'

All staff members are aware that should they have any concerns about a child (as opposed to a child being

in immediate danger) they will 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 place a child on the Welfare Register in order to prevent issues from escalating further. This list of pupils constitutes the Schools' **Welfare Register**.

Therefore, 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) and in order to prevent problems escalating, the Designated Safeguarding Lead will liaise with the School's Safeguarding Team (School Medical Officer/GP, Senior nurse manager and counsellors) and a welfare intervention plan is put in place and recorded confidentially on the school information management system (Apollo). All Stowe staff are trained to be especially alert to the potential welfare concerns of pupils identified 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. Monitoring of these children placed on the School's Welfare Register may require liaison with Children's Social Care and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary.

The Welfare Register

The DSL and Safeguarding Team work to provide coordinated support for the children on the Welfare Register and cases are reviewed to consider referrals to external counselling services (CBT, CAMHS et al). The DSL and Safeguarding Team ensure that the child's wishes and feelings are taken into account whilst decisions are made concerning suitable support. Children are asked for feedback (KCSiE 2016 Part 2:79) on the support they are receiving by 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 child at their heart. The DSL monitors children on the Welfare Register 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 Service (ESAS) Tel: 01296 382912

Education Safeguarding Advisor (ESAS Lead Manager)

Name: Therese McAlorum

Email: tmcalorum@buckscc.gov.uk

Tel: 01296 382732

The DSL will always refer Level 3 (section 17) and Level 4 (section 47) cases to Social Services. In cases referred to Social Services, the child is placed on the **School's Child Protection register**.

Pupil Welfare Plans

The DSL asks Housemasters to prepare specific *Pupil Welfare Plans* for pupils listed on the Welfare Register; Housemasters are asked to complete these plans **by the end of the same week as a need for early help is identified**. This pastoral Welfare Plan is designed to identify any special measures or controls that would need to be known by the House team in order to keep a child safe. Updates of existing Pupil

Welfare Plans may also be requested by the DSL during the year.

The list of pupils on the Welfare Register and who have pastoral Welfare Plans is shared with the MO's, School nurses and School counsellors (Working Together to Safeguard Children 2015). The Apollo Trip form, completed for all trips requiring overnight residence away from School requires the leader of the proposed activity to consult the DSL as part of the Risk Assessment process. Welfare Plans are shared with the Activity leader under conditions of strict confidentiality.

2.1 CONFIDENTIALITY AND INFORMATION SHARING

This section should be read in conjunction with the Staff 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 at issue 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 Officer's and Nurses at the Medical Centre, the School Counsellors and Stowe Minister. 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 pupils 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 47 of the Children Act 1989 in accordance with the requirements of *Working Together to Safeguard Children 2015*.

2.2 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead 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.

3. CHILD PROTECTION: TYPES OF ABUSE

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. All staff must be alert to behaviours such as drug taking, alcohol abuse, truanting and sexting which put children in danger. Staff

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

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 institutional (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.

3.1 Managing allegations against other children (Peer on Peer abuse)

As a school we will minimise the risk of allegations against other pupils by:

1. Providing a developmentally appropriate PSHE syllabus which develops pupils understanding of acceptable behaviour and keeping themselves safe.
2. Having systems in place for any pupil or parent to raise concerns with staff; knowing that that they will be listened to, believed and valued.
3. Providing interventions and peer support to those pupils identified as being at risk.
4. 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 pupil behaviour and discipline policy.

However, the school recognises that children are vulnerable to abuse by their peers; such **abuse will be taken as seriously as abuse by adults, it will not be dismissed as 'part of growing up' and will be subject to the same child protection procedures** (KCSiE 2016; 76-78.) **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; or
- The perpetrator has **repeatedly** tried to harm one or more children; or
- There are concerns about the **intention** of the alleged perpetrator (e.g. the acts could be considered exploitative)
- Is of a serious nature that 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, discomfort and/or humiliation. 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.

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 peer on peer abuse.

Procedure:

- **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/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 it is clear 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 abuser is protected from **reprisals, 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 improper behaviour and 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 and DSL

3.2 Physical Abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be cause when a parent or carer fabricates the symptoms of, or deliberately induces illnesses in a child.

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 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 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 isn't 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.

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.

3.6.1 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 shares 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 DSL immediately

The DSL will inform the Headmaster, Senior Master and Housemaster of the incident and parents/guardians will be informed at this stage, unless there is good reason to believe that involving parent/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 Initial Assessment:

The DSL will hold a meeting with the pupil 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 services and/or platforms
- Whether immediate action should be taken to delete or remove images from devices or online services
- 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, for example, 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 and Headmaster and will be based on 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 will 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 parent/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 the pupil to inform their parents themselves.

Viewing the imagery

Staff should **not** view youth produced sexual imagery unless there is 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 has been 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
- 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 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. 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 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.

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

3.7 Keeping Children Safe in Education Annex A (2016) acknowledges the need for all schools to be particularly aware of the dangers of **grooming and Child Sexual Exploitation (CSE)**:

'CSE is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

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 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.

At Stowe School, staff should be alert to the understanding that sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is 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.

Young people who are being sexually exploited may:

- Be involved in abusive relationships, intimidated and fearful of certain people or situations
- Hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- Associate with other young people involved in sexual exploitation
- Get involved in gangs, gang fights, gang membership
- Have older boyfriends or girlfriends
- Spend time at places of concern, such as hotels or known brothels
- Not know where they are, because they have been moved around the country
- Go missing from home, care or education.

The signs of grooming aren't 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 new things such as clothes or mobile phones that they can't or won't explain
- 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 Radicalisation & Extremism: Stowe staff should read this section in conjunction with our E-Safety Policy & Equality Policy. All staff should be alert to pupils attempting to access online and via 'apps' material that could be used in an attempt to radicalise children.

The Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. The following guidance is written with regard to section 26 of the Counter-Terrorism and Security Act 2015; which defines Extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed

forces, whether in this country or overseas' (KCSiE 2016). The most significant threats are currently from terrorist organisations in Syria and Iraq, and Al Qa'ida associated groups. However, terrorists associated with the extreme right also pose a continued threat.

There is no place for extremist views of any kind in our School. Our pupils see our School as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this. As a School we recognize that extremism and exposure to extremist views can lead to poor outcomes for children and so should be addressed as a safeguarding concern. We also recognize that if we fail to challenge extremist views we are failing to protect our pupils.

Any concerns about a child suspected of involvement in extremist groups, terrorism or who could be vulnerable to radicalisation must be reported to the DSL. The DSL is aware of their duty to report such concerns to 'Channel' under the Prevent Strategy and to Social Services.

Contact details:

In an emergency call 999 and Social Services First Response Team & Police (MASH) Tel: 0845 4600 001 or 01296 383962

Out of Hours Service Tel: 0800 999 7677

For non-emergency advice and support phone: 0207 3407264

E-mail: counter-extremism@education.gsi.gov.uk

Identifying pupils at risk of Radicalisation: There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances. Examples of influences that make individuals **vulnerable** to engagement with an extremist group, cause or ideology include:

- feelings of grievance and injustice
- feeling under threat
- a need for identity, meaning and belonging
- a desire for status
- a desire for excitement and adventure
- a need to dominate and control other
- susceptibility to indoctrination
- a desire for political or moral change
- opportunistic involvement
- family or friends' involvement in extremism
- being at a transitional time of life
- being influenced or controlled by a group
- relevant mental health issues

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right)

groups)

- attempts to recruit others to the group/cause/ideology

Intent to cause harm: Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a **readiness to use violence** and address what the individual would do and to what end. They can include:

- Over-identification with a group or ideology
- 'Them and Us' thinking
- dehumanisation of the enemy
- attitudes that justify offending
- harmful means to an end
- harmful objectives

Example indicators that an individual has an **intention to use violence** or other illegal means include:

- clearing identifying another group as threatening what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology
- condoning or supporting violence or harm towards others
- plotting or conspiring with others

Capability to cause harm: Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public.

Example indicators that an individual is capable of directly or indirectly causing harm include:

- having a history of violence
- being criminally versatile and using criminal networks to support extremist goals
- having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
- having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills)

Warning signs and indicators that Radicalisation may be about to take place, and/or contact with extremist groups have already taken place, can be found on the Safeguarding section of StoweNet

3.9 Keeping Children Safe in Education (2016) also acknowledges Female Genital Mutilation as a specific safeguarding issue:

Section 5B 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 refer concerns or disclosures to the DSL who will activate local

safeguarding procedures, using existing national and local protocols for multi-agency liaison with policy 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

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 practice 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 on the Safeguarding section of StoweNet.

4. SIGNS OF POSSIBLE ABUSE

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

- 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 for example 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 illness which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- 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 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 problems, 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 detail on the Safeguarding and Child Protection section of StoweNet.**

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, eg 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, they 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 s/he 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 in to 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 undertakings 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 Ms K McIntock as 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 Designated Safeguarding Lead within 24 hours
- All evidence for example; scribbled notes, child drawings, artwork, poems, mobile phones containing text messages, clothing, computers, must be safeguarded and preserved and passed to the Designated Safeguarding Lead.
- **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 will be available to support staff following a disclosure.**

6. DESIGNATED SAFEGUARDING LEAD (DSL)

The Designated Safeguarding Lead (DSL) is responsible for matters relating to child protection and welfare. The School acknowledges that whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection remains with the designated safeguarding lead; this **lead responsibility should not be delegated**. The School will ensure that the Designated Safeguarding Lead is given the time, funding, training, resources and support to enable them to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.

Parents are welcome to approach the Designated Safeguarding Lead 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 who will notify the Designated Safeguarding Lead in accordance with these procedures. A separate job description for the role of DSL is available on StoweNet.

In accordance with Annex B of Keeping Children Safe in Education (2016), the main responsibilities of the Designated Safeguarding Lead are:

Managing Referrals

- i. 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;
- ii. support staff who make referrals to local authority children's social care and/or to the Channel programme;
- iii. take lead responsibility for promptly making referrals to the Disclosure and Barring Service (DBS) (PO Box 181, Darlington, DL1 9FA Tel: 01325 953795) where a member of staff or volunteer is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child.
- iv. take lead responsibility for promptly making referrals to the police where a crime may have been committed which involves a child.

Work with others

The designated safeguarding lead 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 officer (LADO) for child protection concerns (all cases which 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 staff.

Training

In addition to formal training (see section 11 of this policy), the knowledge and skills of the DSL and deputy DSL 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 conduct a child 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 or refresher training courses; and

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raising Awareness

The designated safeguarding lead should:

- ensure the school or college's child protection policies are known, understood and used appropriately;
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the 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 or college in this; and
- link with the local LSCB 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 child protection records, for all new pupils, within the first week of admission. Where children leave Stowe school the DSL will ensure their child protection file is transferred to the new school or 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.

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 on site and whilst generally speaking the DSL will be available in person, in exceptional circumstances availability via phone or other such media may be necessary. The School has appointed Mr N Morris (Director of Operations) and Mrs C Spencer (Head of Human Resources) as deputy designated safeguarding leads to provide adequate and appropriate non-term time cover for children on site during lettings organised by Stowe Enterprises Limited (SEL)

7. ALLEGATIONS against members of staff, volunteers, the Headmaster or Governors

The School has procedures for dealing with allegations 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 false 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 Staff Conduct Policy 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

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; 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 (LADO) will be sought in borderline cases

All such allegations must be dealt with as a priority and referred to the Designated Officer (LADO) within one working day

Reporting allegations against staff, the Headmaster, Governors or volunteers

Where an allegation or complaint is made against any member of staff (other than the Designated Safeguarding Lead), a volunteer or a Governor, the matter must be reported immediately to the Headmaster

If the allegation involves the Headmaster, the Designated Safeguarding Lead and Second Master will liaise directly with the Chairman of Governors without notifying the Headmaster first

Where an allegation is made against the Designated Safeguarding Lead, the matter must be reported immediately and directly to the Headmaster

The Designated Officer (LADO) 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 Chairman of Governors, as appropriate, to report the matter to the Designated Officer (LADO) **Bridget Day:** bday@buckscs.gov.uk **Tel:** 01296 382070, 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 (LADO) before further action is taken and this discussion will be recorded in writing.

The person with responsibility for contacting the Designated Officer (LADO) 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 (LADO) has been consulted. The parents or carers 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 (LADO) before allowing the staff member to resume their teaching duties at the school or re-enter boarding/on-site accommodation. Where the Designated Officer (LADO) 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)*.

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 and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Where a referral is made to the DBS, [PO Box 181, Darlington, DL1 9FA Tel: 01325 953795], a separate referral will also be made as soon as possible to the National College for Teaching and Leadership (NCTL) in cases of serious professional misconduct. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

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 to the Disclosure and Barring Service (PO Box 181, Darlington, DL1 9FA Tel: 01325 953795) as soon as possible if the criteria are met and a separate referral will also be made as soon as possible to the National College for Teaching and Leadership (NCTL) 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 have not been met, separate consideration will be given as to whether the matter should be referred to the National College for Teaching and Leadership (NCTL). This will include matters where there has been unacceptable professional conduct, conduct which may bring the teaching professional into disrepute, conviction at any time of a relevant offence or where a prohibition order may otherwise be appropriate.

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 their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

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

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. MISSING CHILD PROCEDURE

All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting of any pupil missing from the School. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

Please see the School's separate Missing Pupil Policy for further details.

If the school became aware of a child having run away from or having gone missing from home, this will be dealt with as a safeguarding matter and the child protection procedures will be followed.

9. SAFE RECRUITMENT

The School follows the Government's recommendations for the safer recruitment and employment of staff who work with children, including obtaining Disclosure and Barring Services clearance for all staff and checks on Prohibition Orders and List 99. Please see the School's separate Recruitment Policy

9.1 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.

9.2 The School will make a referral to the Disclose and Barring Service (P O Box 181, Darlington, DL1 9FA Tel 01325 953795) and in the case of a member of teaching staff to the National College for Teaching and Leadership (NCTL) to consider prohibiting the individual from teaching as soon as possible if the following criteria are met:

- a. It is decided to dismiss a member of staff or to cease using the services of any person at the School because he or she is considered unsuitable to work with children (a settlement/compromise agreement will not be used) or
- b. A member of staff or volunteers tenders his or her resignation, or ceases to provide his or her services, and child protection allegations had been made.

Any such incidents will be followed by a review of the safeguarding procedures within the School with a report being present to the Governors without delay.

10. 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 child 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. A visitor's book is kept at Reception and all visitors/contractors are required to sign in on arrival and sign out on departure and will be escorted whilst on School premises by a member of staff or appropriately vetted volunteer. 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/signage with the title 'Visitor' which must be clearly worn at all times and displayed on contractor vehicles whilst on the School premises.

10.1 Visiting Speakers

All prospective visiting speakers must be approved by either the Headmaster or Deputy Head. 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.

Please see the School's separate Visiting Speakers Policy for further details.

11. SAFEGUARDING & CHILD PROTECTION TRAINING

All training will be carried out in accordance with Buckinghamshire Safeguarding Children Board procedures.

The Designated Safeguarding Lead and the Deputy DSL attend safeguarding and child protection training courses and training on inter-agency working at least every two years. The designated safeguarding lead has undertaken Prevent training (September 2015).

All staff, including temporary staff, governors and volunteers, will be provided with safeguarding induction training **within the first week of employment** that includes:

- a. This policy
- b. The identity, role and contact details of the Designated Safeguarding Lead
- c. The Stowe School safeguarding and Child Protection referral pathway and Safeguarding and Child Protection procedures booklet
- d. The Staff Conduct Policy & Whistleblowing Policy
- e. A copy of Part 1 & Annex A of *Keeping Children Safe in Education (Sept 2016)*

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 Part 1 & Annex A of *Keeping Children Safe in Education 2016* 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 2016) is provided by the DSL to all staff at least annually and as required. In addition, all academic and pastoral staff complete safeguarding and child protection modules through the school's online training package (EduCare) as part of their performance review and CPD. 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 Designated Safeguarding Lead will ensure that the Headmaster, all staff members and the nominated Governors undertake child protection training appropriate to their role which will be updated regularly in accordance with the Buckinghamshire Safeguarding Children Board (BSCB) requirements and following consultation with BSCB where appropriate. This statutory triennial training is delivered by a member of the BSCB, ESAS team. This ensures that training meets statutory requirements whilst facilitating collaboration between Stowe School and the BSCB.

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 child protection procedures in this policy
- To know how to access and implement the procedures, independently if necessary
- Include the Designated Safeguarding Lead in matters of concern regarding staff conduct
- Undertake appropriate training, including refresher training which will be updated every three years in according with the Buckinghamshire Local Safeguarding Children's Board requirement.

Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School by the Designated Safeguarding Lead. Where an incident involved a member of staff, the Designated Officer (LADO) will assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

12.1 The Headmaster, EMT and the DSL will monitor and evaluate, with Governors, the effectiveness of the Safeguarding and Child Protection Policy on an annual basis. The Safeguarding and Child Protection Policy will be subject to review annually (or sooner if Statutory Guidance requires).

12.2 The full Governing Body will annually review this policy and the implementation of its procedures, including good cooperation with local agencies, and approve the amendments to the policy, which will, in turn, be signed off by the Chairman of Governors. This annual review will take account of evidence such as staff training in safeguarding matters, referral data, analysis of any issues and themes which have emerged in the School and how these have been handled.

This Policy is considered a 'live' document and will be updated as statutory guidance is released. It was reviewed and approved by the full Governing Body on 21st November 2016. The next annual review of this Policy by the full Governing Body will take place on 21st November 2017 as part of the wider annual review of Safeguarding at the School.

Signed by:



Chairman of the Governors



Supervisory Safeguarding Governors



Headmaster



Designated Safeguarding Lead

Appendix 1

Key Local Area Contacts

Local Authority Designated Officer (LADO)

Name: Bridget Day
Email: bday@buckscc.gov.uk
Tel: 01296 382070

Deputy Local Authority Designated Officer

Name: Yvette Morello
Email: ymorello@buckscc.gov.uk
Tel: 01296 387820

Education Safeguarding Advisor (ESAS Lead Manager)

Name: Therese McAlorum
Email: tmcalthum@buckscc.gov.uk
Tel: 01296 382732

Education Safeguarding Advisory Service (ESAS) TEL: 01296 382912

The aim of this service is to provide practical support, advice and guidance to schools on all matters relating to safeguarding. In addition, the team of Safeguarding Officers deliver a range of services including a series of training packages to schools throughout Buckinghamshire.

Child Social Services & Police

First Response Team/MASH Tel: 0845 4600 001/ 01296 383962
Email: cypfirstresponse@buckscc.gov.uk
secure-cypfirstresponse@buckscc.gcsx.gov.uk

Out of Hours Service Tel: 0800 999 7677

Family Resilience 0845 4600 300