



ASHDOWN HOUSE SAFEGUARDING POLICY (CHILD PROTECTION) (INCLUDING BOARDING AND DAY)

*“Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider at all times what is in the **best interests** of the child.” Keeping Children Safe in Education (September 2018)*

*“No single professional can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.” Keeping Children Safe in Education (September 2018)*

“The designated safeguarding lead (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.” (KCSIE Sept. 2018)

Aims of the Ashdown House school with regard to Safeguarding (Child Protection)

Children need to be safe and to feel safe in school and they have the right to be protected from harm. Children need support that matches their individual needs, including those who are at risk or may have experienced abuse.

All children at Ashdown House:

- have the right to speak freely and voice their values and beliefs.
- are encouraged to respect each other’s values and support each other.
- have the right to be supported to meet their emotional, and social needs as well as their educational needs – a happy, healthy, sociable child will achieve better educationally.

Schools, and we at Ashdown House, can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours.

All school staff and visitors have an important role to play in safeguarding children and protecting them from abuse.

All school staff should maintain an attitude of ‘it could happen here’ where safeguarding is concerned, and staff must always seek to act in the best interests of the child.

All school staff should be prepared to identify children who may benefit from early help (chapter 1 ‘Working Together to Safeguard Children’). Early help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years. In the first instance, staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment.

Any staff member who has a concern about a child’s welfare should follow the referral process set out below. Staff may be required to support social workers and other agencies following any referral.

School contact details:

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Haydon Moore	moore_h@ashdownhouse.com
Deputy Designated Safeguarding Lead (DDSL)	Paddy Mason	mason_p@ashdownhouse.com
Deputy Designated Safeguarding Lead (DDSL)	Tom Gloster	gloster_t@ashdownhouse.com
Headmaster	Mike Davies	headmaster@ashdownhouse.com
Chair of Board of Trustees	Dr Ralph Townsend	01865390030 mail@cothill-trust.net
Designated Safeguarding Trustee	Dr Ralph Townsend/David Miles	01865390030 dmiles@cothilltrust.org
Ashdown House designated Trustee	David Miles	dmiles@cothilltrust.org
Trust CEO	Tom Beardmore-Gray	01865 390720 tbeardmoregray@cothilltrust.org
Head of Boarding	Tom Gloster	gloster_t@ashdownhouse.com
Matron (Boarding)	Bella Duarte	duarte_b@ashdownhouse.com
Designated Safeguarding Lead for Boarding	Haydon Moore	moore_h@ashdownhouse.com
First Aid Staff	Julie Corbin	sister@ashdownhouse.com
School Counsellor	Kerri Wyatt	wyatt_k@ashdownhouse.com

If parents, carers or guardians have any concerns of a safeguarding nature they are advised to contact the DSL (Designated Safeguarding Lead).

External contact details:

Description	Contact
Single Point of Advice (SPOA)	Monday to Thursday 8.30am to 5pm, Friday 8.30am to 4.30pm. <u>01323 464222</u> Out of hours contact the Emergency Duty Service. <u>01273 335905</u> or <u>01273 335906</u>
Emergency Duty Service	Monday to Thursday - 5pm to 8.30am Weekends - Friday 4.30pm to Monday 8.30am. 01273 335905 or 01273 335906
Local Authority Designated Officer (LADO) - Amanda Glover	amanda.glover@eastsussex.gov.uk 01323 466606 or 07825 782793
Local Safeguarding Children’s Board (LSCB) Contact:	lscbcontact@eastsussex.gov.uk 01273 481544
Prevent (Radicalisation & Extremism) Non-emergency Advice	counterextremism@education.gsi.gov.uk 020 7340 7264
Childline	0800 1111
National Bullying helpline	0845 225 5787
NSPCC 2/7 Helpline/Textline	0808 800 5000/Text:88858
NSPCC FGM Helpline	fgmhelp@nspcc.org.uk 0800 028 3550

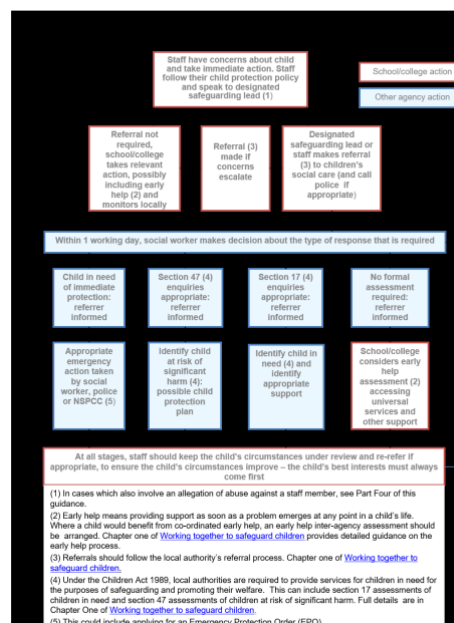
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ASHDOWN HOUSE SAFEGUARDING (CHILD PROTECTION) POLICY

1. Guidance on what to do if you are worried a child is being abused or become aware of a potential safeguarding issue.

1.1. General

- 1.1.1. Discuss your concerns with the DSL, or if not available, with the DDSL. If requested to do so, put your concerns in writing, with dates and details of these suspicions and pass to the DSL.
- 1.1.2. Anyone can make a referral to social care. It is normal for concerns to be raised with and managed by the DSL, however, if you remain concerned, you can refer your concerns directly to Single Point of Advice (SPOA) if related to a child in need, or the Local Authority Designated Officer(s) (LADO), if related to an allegation regarding an adult. (Contact details on Page 2).
- 1.1.3. If staff members have concerns about a child (as opposed to a child being in immediate danger) they will need to **act immediately**. Where possible, there should be a conversation with the DSL to agree a course of action, although any staff member can make a referral to children's social care. **Pastoral support will be given to the child** and other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the LSCB. **The school will operate safeguarding procedures in line with locally agreed inter-agency procedures and Contact details for the LSCB/SPOA are found on page 3 of this policy.**
- 1.1.4. If after a referral, the child's situation does not appear to be improving then the DSL should press for re-consideration.
- 1.1.5. If early help is appropriate, the DSL should support the member of staff in liaising with other agencies and setting up inter-agency assessment as appropriate.
- 1.1.6. If early help is appropriate, the case should be kept under constant review and consideration given to a referral if the child's situation doesn't improve. (For more information on early help, please refer to 'Working Together to Safeguard Children'. **The flowchart below can be found on p. 13 of KCSIE Sept 2018**



1.2. On a disclosure regarding a child/pupil in need or at risk

1.2.1. It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual, his or her abuser may have threatened them, they may have lost all trust in adults, (or other children in cases of peer on peer abuse) they may believe, or have been told, that the abuse is his or her own fault.

1.2.2. If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you may pass the information on – you are not allowed to keep secrets. Confidentiality cannot be promised to a child who is making a disclosure. The point at which you say this is a matter for professional judgement.

1.2.3. During your conversation with the child:

- allow a child to speak freely and lead the discussion; never stop a child who is freely recalling significant events and do not press for details by asking questions, e.g. “What did they do next?”. Avoid asking leading questions.
- remain calm and do not over react as a child may stop talking if they feel they are upsetting you.
- listen and be supportive - give reassuring nods or words of comfort e.g. ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- accept what the child says without challenge, and reassure them that they are safe, that they are doing the right thing and that you recognise how hard it is for them.
- do not promise complete confidentiality, although you can explain that they have done the right thing and tell them that you will only be passing this information on to the appropriate person within school in order to keep him or her and other children safe.
- do not admonish the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive, but a child may interpret it that they have done something wrong.
- do not be afraid of silences, remember how hard this must be for a child.
- when asking questions always ask open questions using the TED principle of ‘Tell’ me, ‘Explain’ to me, ‘Describe’ to me.
- make careful and detailed legible notes as they may be needed later. Record the date, event, observation, disclosure and action taken. Name anyone else present, sign it and hand it to the DSL as soon as possible. Where possible, please use the pink welfare concern forms.
- don't investigate, although you may use questions such as, ‘Is there anything else you'd like to tell me?’
- do not offer any physical touch as comfort, it may be anything but comforting to a child who has been abused.
- do not lay blame or criticise either the child or the perpetrator.

- tell a child what will happen next and he or she may agree to go with you to see the DSL. Otherwise, let him or her know that someone will come to see them before the end of the day.
- 1.2.4. Do not discuss the matter with anyone else.
- 1.2.5. Report the information immediately to the DSL (or the DDSL if the DSL is away). The DSL will then make any appropriate contact with Single Point of Advice (SPOA) immediately (or certainly within one working day) for advice, or to make a referral. Parental consent is not required before any contact with, or referral to, SPOA.
- 1.2.6. If a child is at risk the DSL will make a referral to SPOA immediately.
- 1.2.7. If a crime may have been committed, the DSL (or the DDSL) must report the matter to the police immediately.
- 1.2.8. It is not the responsibility of the school to investigate suspected cases of abuse. It is, however, our responsibility to follow local safeguarding procedures and to recognise that a child telling you that he or she has been abused may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against the perpetrator can be seriously damaged by any suggestion that the child's account has in any way been influenced by the person he or she has told.
- 1.2.9. The school will not undertake their investigations of any disclosure of allegation without prior consultation with, and advice from, SPOA (or LADO).
- 1.2.10. Please seek support if you feel distressed, and follow up with the DSL if you remain concerned.
- 1.3. **On receiving an allegation against anyone working in the school (including temporary and volunteer staff.)**
- 1.3.1. Allegations against staff or volunteers must be reported straight away to the Head and DSL or, in their absence the CEO of the Trust. (Please see points '1.3.5' and '1.3.6' below).
- 1.3.2. The Head and DSL will seek advice immediately (and certainly within one working day) from, or make a referral to, the LADO. The LADO will then advise the school and preside over the investigation of any such allegation or suspicion of abuse. Parental consent is not required before any contact with, or referral to, the LADO.
- 1.3.3. If a child is at immediate risk the DSL will make a referral to SPOA immediately.
- 1.3.4. If a crime may have been committed, the DAS and/or Head (or the DDSL) must report the matter to the police immediately.
- 1.3.5. **If you suspect or become aware of an allegation of child abuse made against the Head or the DSL at Ashdown, then the CEO of the Trust must immediately be informed (without informing the Head or DSL). The CEO will liaise with the LADO without informing the Head/DSL.**
- 1.3.6. Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. The welfare of the child is however

paramount. The Trust's Whistle Blowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

- 1.3.7. If the concerns prove to be unfounded, staff should not reproach themselves for having raised the issue. In cases of this nature it is always better to be safe than sorry.

1.4. On receiving a disclosure regarding abuse by one or more pupils against another pupil

- 1.4.1. **Additional guidance on peer on peer abuse can be found in Appendix D of this policy.** The school's anti-bullying procedures should be followed. However, when there is reasonable cause to suspect that a child is suffering peer-on-peer abuse, or likely to suffer, significant harm this warrants a response under Safeguarding (Child Protection) procedures.

- 1.4.2. Follow the same advice as in 1.2 above when listening to the child and inform the DSL. The Safeguarding (Child Protection) procedures set out in this document will then be followed.

2. Additional advice to staff about dealing and working appropriately with pupils.

- 2.1. Staff should be fully aware of Safeguarding (Child Protection) issues. Staff should avoid putting themselves (or indeed children) in a vulnerable position. For example:

- 2.1.1. Staff should avoid a situation when they are 1:1 with a child in an enclosed environment.
- 2.1.2. When coaching games, staff should avoid close personal contact when demonstrating techniques relating to the sport.
- 2.1.3. Staff should not communicate with children on social media or personal emails.
- 2.1.4. Staff should not divulge personal details (such as personal phone numbers, email addresses) to children.
- 2.1.5. Staff should avoid any contact with children, outside of the school, which is not school related.
- 2.1.6. Staff should avoid creating personal friendships with children, and should aim to keep relationships with children on a professional level.
- 2.1.7. Staff teaching individual lessons such as Music or Mandarin should be particularly aware and not place themselves or children in a vulnerable position.
- 2.1.8. Please also refer to the Staff Code of Conduct policy, found in the Staff Handbook.

3. Actions by the DSL (or, if applicable, DDSL, CEO of the Trust)

3.1. On receiving a disclosure regarding a child/pupil in need or at risk

- 3.1.1. On receipt of a disclosure or a serious concern about the safety or well-being of a child the DSL will consult SPOA immediately or certainly within one working day. (There is no requirement for the parents to be informed first or permission to be sought before contacting SPOA).

- 3.1.2. In borderline cases of lower level concern, discussions with SPOA will be held informally, without naming the individual and in this way advice can be sought.
- 3.1.3. If a child is at immediate risk the DSL will make a referral to SPOA immediately.
- 3.1.4. The DSL will immediately contact the Police regarding any criminal matters, such as a child being at immediate risk or of being harmed.
- 3.1.5. With regard to a concern regarding FGM, the Police must be informed immediately (Phone 101).
- 3.1.6. With regard to a concern regarding radicalisation and/or extremism the police must be informed immediately (Phone 101).

3.2. On receiving an allegation regarding anyone working in the school.

- 3.2.1. On receipt of a Safeguarding (Child Protection) related allegation against a member of staff, or any employee of the school, or any volunteer, the DSL will consult the LADO immediately or certainly within one working day. The LADO will then advise the school and preside over the investigation of any such allegation or suspicion of abuse. (There is no requirement for the parent to be informed first or permission to be sought before contacting the LADO).
- 3.2.2. Where the school has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL will discuss these concerns with the LADO, which may firstly be an enquiry with 'no names'.
- 3.2.3. The DSL will immediately contact the police regarding any criminal matters, including in the case of any serious harm occurring or if there is a child at risk of immediate harm.
- 3.2.4. The school (Head / DSL) must report to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer) whose services are no longer used because s/he is considered unsuitable to work with children, within one month of leaving the school.
- 3.2.5. The school (Head / DSL) must consider making a referral to the **Teaching Regulation Agency (TRA)** where a teacher has been dismissed or resigned before he/she would have been dismissed. In circumstances where unacceptable professional conduct, conduct that may bring the profession into disrepute or if there is a conviction for a relevant offence, a referral must be made.

4. The Designated Safeguarding Lead's (DSL) other roles and responsibilities.

- 4.1. The role of the DSL is in accordance with Annex B of KCSIE (September 2018).
- 4.2. The Deputy Designated Safeguarding Leads (DDSLs) are trained to the same standard as the DSL. However, the ultimate lead responsibility for child protection remains with the DSL and this lead responsibility should not be delegated.
- 4.3. The DSL or DDSL will always be available for staff in the school to discuss safeguarding concerns.

- 4.4. The DSL will undertake Safeguarding (Child Protection) and Interagency training in locally agreed procedures, at least every two years (See Section 10.1 for more details).
- 4.5. Staff Induction Safeguarding (Child Protection) Training is the responsibility of the DSL and is conducted for all staff and those who join the school. New staff will receive copies of the school's policies, to include Safeguarding, Staff Code of Conduct and Part One and Annex A of KCSIE (September 2018). Names of staff who attend such induction training must be noted by the DSL, and any non-attendance must be followed up immediately.
- 4.6. The DSL is responsible for ensuring that staff (including temporary, and volunteer staff) at the school receive regular update training (annually), in accordance with the requirements of the LSCB. **This should include Prevent and online safety.** Names of staff who attend such INSET sessions must be noted by the DSL, and any non-attendance must be followed up immediately. Additionally, staff will receive informal updates through e-mail, e-bulletins and staff meetings.
- 4.7. The DSL provides an annual update to the Board of Trustees on Safeguarding (Child Protection) matters including assisting the whole Board of Trustees in their annual review of Safeguarding (Child Protection).
- 4.8. The DSL will keep informed of any new regulations, and child protection procedures, and ensure that staff receive updated training, when any new regulations are introduced.
- 4.9. The DSL will ensure each member of staff has access to and understands the school's Safeguarding (Child Protection) Policy and have read the KCSIE (Part 1 and Annex A) (September 2018). The DSL will collect and retain all the staff declarations on this task (appendix G), ensuring that any 'non-returns' are followed up immediately.
- 4.10. The DSL will lead regular case monitoring reviews of vulnerable children. These reviews must be evidenced in files.
- 4.11. Safeguarding (Child Protection) information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family. A written record will be made of what information has been shared with whom, and when.
- 4.12. Safeguarding (Child Protection) records will be stored securely in a central place, separate to academic records. Individual files will be kept for each child: the school will not keep files on the child's family. Files will be kept for at least the period during which the child is attending the school, and beyond that in line with current data legislation and guidance.
- 4.13. Access to these records by staff other than by the DSL will be restricted, and a written record will be kept of who has had access to them and when.
- 4.14. The DSL will support staff who make referrals to SPOA, LADO, LSCB or the Channel programme (see 1.3.7)
- 4.15. Communication with parents will be in line with guidance given by the LADO, LSCB and appropriate to each individual case.
- 4.16. The DSL will not disclose to a parent any information held on a child if this would put the child at risk of significant harm.
- 4.17. If a pupil moves from this school, Safeguarding (Child Protection) records will be forwarded on to the Designated Safeguarding Lead at the new school, with due regard to their confidential

nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. We will record where and to whom the records have been passed and the date.

- 4.18. The DSL will contact a child's former school prior to them starting at Ashdown House to ascertain whether there are any safeguarding concerns. Direct contact may be necessary between the schools/providers.
- 4.19. The DSL must ensure that this school Safeguarding (Child Protection) policy is made available to parents and prospective parents on the school website.
- 4.20. **The DSL has overall responsibility for online safety within the school.**

5. Role and responsibilities of the CEO (and whole) Board of Trustees.

- 5.1. Ensure the CEO's contact address is available to all staff, parents, carers and guardians.
- 5.2. Know and understand the Safeguarding (Child Protection) procedures to be undertaken, if there is an allegation or disclosure raised, such as an allegation against the Head.
- 5.3. Ensure there is/are member(s) of the board of Trustees with designated Safeguarding (Child Protection) role(s).
- 5.4. To contact the LADO immediately, or within one working day, if there is a Safeguarding (Child Protection) allegation against the Head.
- 5.5. Undertake an annual review by the whole Board of Trustees (who have collective responsibility) of the Trust's overarching, and each individual Trust school's, Safeguarding (Child Protection) policy, to ensure the safety and well-being of the pupils and regulatory compliance.
- 5.6. Undertake an annual review, by the whole Board of Trustees (who have collective responsibility), of each Trust schools' implementation of their Safeguarding (Child Protection) policy, to ensure the safety and well-being of the pupils and regulatory compliance.

6. Role and responsibilities of the Designated Safeguarding Trustee(s)

- 6.1. Visit their designated Trust school (or schools) **on an annual basis, although frequently termly**, to check compliant implementation of their individual Safeguarding (Child Protection) policies.
- 6.2. The Designated Safeguarding Trustee(s) provide(s) annual update(s) to the Board of Trustees on Safeguarding (Child Protection) matters including assisting the whole Board of Trustees in their annual review of Safeguarding (Child Protection).

7. Types of abuse and pupils in need or at risk (see appendix D for details)

KCSIE September 2018 states that Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or in a community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or by another child or children.

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. (KCSIE Sept 2018)

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation. (KCSIE Sept 2018)

- Physical abuse.
- Emotional abuse.
- Sexual abuse.
- Physical neglect.
- Child sexual exploitation (CSE).
- Preventing radicalization and extremism and its reporting.
- Female genital mutilation (FGM) and its reporting.
- Honour based violence (HBV)
- Self-harm.
- Psychological
- Domestic violence and/or abuse
- Peer on peer abuse
- Sexual violence and sexual harassment between children

8. Overview of how the school promotes a safe environment.

8.1. General

- 8.1.1. The School's role in safeguarding the welfare of children begins in creating an environment where children are safe from harm, in establishing a culture where they can raise any anxieties with confidence and incorporating child protection issues in the classroom.
- 8.1.2. All Staff should maintain an attitude of 'it could happen here' where safeguarding is concerned and Staff must always seek to act in the best interests of the child. Staff endeavour to ensure a culture of vigilance.
- 8.1.3. **Corporal punishment of any kind is prohibited in the school.**

8.2. Educating the pupils in Safeguarding (Child Protection)

- 8.2.1. In the school curriculum, Personal, Social, Health and Economic Education (PSHEE) lessons, teaching in various subjects, tutor/form periods, visiting speakers and assemblies, help to inform pupils about issues such as:
- sexual activity.
 - grooming techniques.
 - online e-safety.
 - drug use.
 - building resilience to the risks of radicalization and extremism.
 - keeping themselves safe.
- 8.2.2. There are also many opportunities for pupils to discuss issues and to form and develop their own opinions, in an informal way.

8.3. Listening to the pupils and making them aware

- 8.3.1. We are a 'SHARING school' where all pupils are encouraged (in Prayers, lessons on landings and when matters arise) to share any concerns they may have. Children's viewpoints are listened to and valued.
- 8.3.2. Teachers get to know their children well through daily class teaching as well as during form time. All children are encouraged to discuss any concerns they may have with their class teacher/form teacher or other preferred adult including the Head.
- 8.3.3. Staff training in Safeguarding (Child Protection) includes guidance and advice on listening to children and what to do if a child wishes to disclose to a member of staff.
- 8.3.4. There are many opportunities for pupils to work in small group scenarios such as in extra-curricular clubs or when interacting within the classroom or in Surgery. All these opportunities allow pupils to raise concerns or share views and opinions in a less formal setting.

- 8.3.5. In addition to the form Tutor and other subject teachers, pupils may speak to one of the matrons or boarding staff about a concern.
- 8.3.6. There is a 'Visitor' Dr Fyfe, also trained in Safeguarding (Child Protection), who is able to see pupils and parents by appointment.
- 8.3.7. The Chaplain, Father Nick Leviseur is available to visit and meet with pupils (of all faiths and none) as a source of counsel and support should the need arise.
- 8.3.8. Other discussions across the curriculum provide pupils with the opportunity to share views or express concerns, either via the forum of the class itself or at the end of the lesson by speaking individually to the teachers.
- 8.3.9. When sensitive issues are discussed, pupils have the opportunity to voice their thoughts and concerns to their teacher/form tutor or other member of staff. Pupils can also put such concerns in writing and put them in the box in chapel.
- 8.3.10. Pupils are reminded at the start of each term, and through messages during Prayers, that if they are worried they can seek support from any member of staff, including their class teacher/form Tutor.
- 8.3.11. There is a Safeguarding (Are You Happy?) posters around the school where this information is easy to see and readily available and this also indicates contact details for 'Childline' and the Children's Commissioner
- 8.3.12. The school prefects have a representative from every patrol. The prefects meet once every week over lunch, to raise the views and suggestions from the children.
- 8.3.13. Pupil surveys are carried out asking for the views of the pupils at the end of every term in a personal report, as well as a pupil questionnaire. Data is gathered, analysed and then actioned depending on the nature of the questionnaire. Pupils also have the opportunity to discuss any issues of concern during their PSHEE lesson and form time, as well as regular School Council Meetings.
- 8.3.14. Parental contact is encouraged and extensive. This provides an opportunity for parents to raise concerns raised by their children.

8.4. Safer recruitment of staff

- 8.4.1. All staff who work in the school, including teaching and non-teaching, governors, temporary staff and volunteers, will be checked through the Disclosure and Barring Service (DBS) for an Enhanced Disclosure and a Barred List check, and have all other required regulatory checks completed, including appropriate identity checks, before they start work at the school (according to the school safer recruitment policy). (Volunteers who are not engaged in regulated activity may be exempt certain checks).
- 8.4.2. A staff member can only start work at the school when all of these regulatory checks have been appropriately completed. However, in specific (and rare) circumstances, a staff member may start work at the school pending the return of their enhanced disclosure, provided the 'Barred list' check has been completed and that the staff member has understood and signed a controlled access agreement - this exemption does not apply to Boarding and Early years.

- 8.4.3. All staff will undertake a probationary period, during which time they will receive instruction in the implementation of this Safeguarding (Child Protection) policy.

8.5. Welfare, health and safety

- 8.5.1. The school is committed to ensuring the welfare, health and safety of its staff and pupils. The school will, so far as is reasonably practicable, establish procedures and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety.
- 8.5.2. While the School will take all reasonable steps to ensure the health and safety of its employees, health and safety at work is a responsibility of all staff themselves. It is the duty of each staff member to take reasonable care of their own and other people's welfare, health and safety and to report any situation which may pose a serious or imminent threat to the well-being of themselves, other staff or the pupils.
- 8.5.3. The school also recognises its duty to protect the health and safety of all visitors to the School, including parents, contractors and temporary workers, as well as any members of the general public.
- 8.5.4. Assurances are obtained by the School that all appropriate child protection procedures apply to Staff employed by other organisations who work with our pupils on other sites. (eg residential trips).
- 8.5.5. All necessary risk assessments must be undertaken to help ensure that the school environment is a safe environment for both staff and pupils.
- 8.5.6. Continuing progress has been made to secure, in so far as practicable for our location, the grounds surrounding the main buildings, including enhanced awareness and security of all doors on site. New signage in the front hall and side entrance indicates the signing in process for visitors.
- 8.5.7. Please see the school's 'Health and Safety policy' for further details. (Staff Handbook)
- 8.5.8. The school employs a qualified psychotherapist who is available to counsel children who have specific issues connected with mental health. Referrals may come through the school GP, the school nurse, or from consultation with the DSL. In addition, there is a pupil drop-in clinic on a Tuesday morning where pupils have the opportunity to make a self-referral. This provision is also available for members of staff.

8.6. Safe internet use and IT 'filtering' protection systems

- 8.6.1. There is a school policy for controlled access and appropriate use of the internet. (See the school's E-Safety Policy and [Safer internet strategies](#) for further details in the staff Handbook). Staff are given regular update training by the DSL on Safer Social Networking as part of INSET.
- 8.6.2. The school has internet filtering and protection systems in place, to help prevent inappropriate access and to monitor and take action regarding inappropriate use.
- 8.6.3. Mobile phones with 3G or 4G internet access are as a rule not permitted at school. However, we recognise that overseas pupils require their mobile phone for travel

purposes. All mobile phones are handed in to the houseparents on arrival. Any unauthorized use of mobile phones leads to confiscation at the discretion of the headmaster and parents will be informed. **The use of mobile phones and cameras is set out at Appendix E of this policy.**

- 8.6.4. Laptops may only be used for educational purposes and are secured in the Learning Support Department when not in use.
- 8.6.5. For further information, please refer to *Annex C: Online Safety of KCSIE September 2018*

8.7. Whistle Blowing

- 8.7.1. Whistle Blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear or repercussion.
- 8.7.2. Staff have individual responsibilities to bring matters of concern to the attention of the Senior Management (including the DSL) and/or relevant external agencies. This is particularly important where the welfare of children may be at risk.
- 8.7.3. If the matter concerns a member of the Senior Management, it should be brought to the attention of the CEO of the Trust. If the concern relates to the CEO of the Trust, it should be brought to the attention of the Chair of the Board of Trustees who will refer it to the Local Authority.
- 8.7.4. Please refer also to the school's '*Whistle-Blowing policy*' which is available from the school office.
- 8.7.5. **Please note that the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding Child Protection failures internally. Staff can call: 0800 0280285 – the line is available from 08.00 to 20.00 Monday – Friday and Email: help@nspcc.org.uk Alternatively, staff can write to NSPCC, Weston House, 42 Curtain Road, London ED2A 3NH**

8.8. Visiting speakers

- 8.8.1. Information on the speaker or institution must be provided and known in advance. This information is to be given to the Head.
- 8.8.2. This must align with the ethos of the school and to British values, taking the radicalization and extremism 'Prevent Duty' into account.
- 8.8.3. Whenever possible, a notice period of one month should be given prior to the speaker's visit to school, with the presentation content of the talk being provided in advance.
- 8.8.4. A member of the SMT and other staff will be present at any presentation to ensure that a talk/workshop is aligned with the religious ethos of the school, to British values and takes the 'Prevent Duty' into account.

8.9. Missing pupils

- 8.9.1. A pupil going missing from education is a potential indicator of abuse or neglect. If you are concerned that a pupil has been out of school with no reason or communication from home, you must inform the Head and DSL who will inform the local authority.
- 8.9.2. Any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, is deemed to be at risk.
- 8.9.3. Please refer also to the school's 'Missing Pupils Policy'

9. Safeguarding (Child Protection) training:

9.1. Training for the DSL and DDSL (See Appendix C for a list of DSL training)

- 9.1.1. The DSL and DDSL undertake external Safeguarding (Child Protection) and Interagency training at least every two years in order to:
 - Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments. (Including ['Common Assessment Frameworks \(CAF\)'](#) and ['Team Around the Child \(TAC\)'](#)).
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
 - Ensure each member of staff has access to and understands the school's Safeguarding (Child protection) policy and procedures, especially new and part time staff.
 - Be alert to the specific needs of children in need, those with special educational needs and young carers.
 - Be able to keep detailed, accurate, secure written records of concerns and referrals.
 - Obtain access to resources and attend any relevant or refresher training courses.
 - Encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff, and promote measures the school may put in place to protect the pupils.
 - The DSL will also undertake online 'Prevent Duty' training in order to inform the staff regarding 'Prevent Duty' during INSET sessions.

9.2. Training for all staff

- 9.2.1. This training is undertaken by the DSL and Graffham Consultancy **as well as the schools online account with Educare.**
- 9.2.2. All staff (including full time, part time, temporary and peripatetic teachers, maintenance, support, administration, catering and cleaning staff) will have Safeguarding (Child Protection) training in line with locally agreed interagency procedures including their 'Prevent Duty', which is regularly updated (usually every three years). Any volunteers

working in the school will be made aware of Safeguarding (Child Protection) policy and arrangements by the DSL. The Designated Safeguarding (Child Protection) Trustee with responsibility in this area also attends this training.

- 9.2.3. A record is kept of staff attending this training. This training is repeated for any staff who cannot attend. (See Appendix C for list of staff training sessions).
- 9.2.4. Ashdown House draws on the expertise and experience of all staff in shaping the safeguarding arrangements and policies. Forums such as daily staff meetings, INSETs and an open door policy enable this to happen.
- 9.2.5. All staff are asked to read KCSIE Part 1 and Annex A (September 2018) and sign a declaration to say that they have done so (See appendix G).
- 9.2.6. Staff are selected at random by either the DSL or DDSL to complete a questionnaire on the implementation of this policy. Any follow up points are addressed with the member of staff.
- 9.2.7. A 'LEAP' table is maintained by the Head following random questioning of members of staff. Any follow up points are immediately addressed.

9.3. Induction training for new staff

- 9.3.1. This training is given by the DSL and the DDSL and all new staff are given copies of the Safeguarding Policy, Esafety policy, KCSIE 2018 (part 1 and annex A), Missing Pupil Procedure, Staff Code of Conduct and Whistleblowing Policy.
- 9.3.2. All new staff (in the categories mentioned in 9.2.2 above) will have induction Safeguarding (Child Protection) training in line with locally agreed interagency procedures. This training will include the school's Safeguarding (Child Protection) policy, the staff code of conduct and behavior policy, the school's whistleblowing policy, the identity and role of the DSL (and DDSL), and in their 'Prevent Duty' with regard to the risks of radicalisation and how to identify children at risk of radicalisation and/or extremism. In addition all staff members will receive safeguarding and child protection updates (for example via e-mail, e-bulletins, daily staff meetings etc.) as required, but at least annually to provide relevant skills and knowledge to safeguard children effectively.
- 9.3.3. A record is kept of staff attending this training. This training is repeated for any staff who cannot attend, or who join at other times during the year.
- 9.3.4. All new staff must read KCSIE Part 1 and Annex A (September 2016) and sign a declaration to say that they have done so (See appendix G).

9.4. Other related training

- 9.4.1. The Head (and others in the Senior management) will undertake training in Safeguarding (Child Protection), Safer Recruitment and Interagency work.
- 9.4.2. The Board of Trustees have an annual update in Safeguarding (Child Protection) from the DSL and other training from external agencies when required.

9.5. Induction training for older pupils with responsibilities

- 9.5.1. Years seven and eight, when they have defined areas of responsibility, are given simple basic training in Safeguarding (Child Protection) for instance, to report concerns, to listen and to recognise aspects of pupil behaviour which might cause such concern).

10. Boarding (Specific)

10.1. General points (See appendix F for more details)

- 10.1.1. This whole school Safeguarding (Child Protection) policy applies to the school's provision for boarding.
- 10.1.2. This Safeguarding (Child Protection) policy also provides evidence of compliance with the National Minimum Standards for Boarding Schools (2015) including:
 - I. Standard 2: Boarders' Induction and Support.
 - II. Standard 11: Child Protection.
 - III. Standard 14: Staff Recruitment and Checks on Other Adults

11. Children with Special Educational Needs and Disabilities (SEND)

11.1. General points

- 11.1.1. Children with SEND can face additional safeguarding challenges and staff need to be more vigilant when recognizing abuse and neglect with this group of children. **KCSIE September 2018 advises that evidence shows children with SEND are at greater risk of peer on peer sexual violence and harassment. In addition, there are heightened risks that SEND children face online, for example, from online bullying, grooming and radicalization.**
- 11.1.2. This can include assumptions that indicators of possible abuse such as behavior, mood and injury relate to the child's disability without further exploration;
- 11.1.3. Children with SEND can be disproportionately impacted by things like bullying – without outwardly showing any signs; and
- 11.1.4. Communication barriers and difficulties in overcoming these barriers.

Appendix A:

Cross-referenced linked policies/documentation (all apply both to Day and Boarding):

Policies/documentation available on the school's website:	
1.	Safeguarding Policy
2.	Admissions Policy
3.	Anti-Bullying Policy
4.	Complaints Policy
5.	EAL Policy
6.	First Aid Policy
Please note that the website also contains a copy of the report of any inspections of the school or boarding provision	
Policies/documentation available on request from the school:	
1.	Health and Safety Policy
2.	Curriculum Policy
3.	Academic Performance
4.	Provision for Pupils with EHC Plans
5.	Induction Process for New Staff, Trustees and Volunteers in Child Protection
6.	PSHEE Policy
7.	Whistleblowing – Safeguarding and CT Policy
8.	E safety Policy
9.	Risk Assessment Policy
10.	Safer Recruitment Policy
11.	Promoting Good Behaviour (including misbehavior and exclusions)
12.	SEND Policy
13.	Security Policy
14.	Supervision Policy
15.	Missing Pupils Policy
16.	Tree Climbing Policy
17.	Positive Handling Policy
18.	School Search Procedure
19.	Swimming Pool Policy
20.	Equal Opportunity Policy
21.	Minibus and Private Car Policies
22.	Restricted Access Policy
23.	Registration and Attendance Policy

Appendix B:

Additional and useful web links:

[Working Together to Safeguard Children \(2018\)](#)

(Local authorities have overarching responsibility for safeguarding and promoting the welfare of all children and young people in their area. They have a number of statutory functions and this guidance sets these out in detail)

[Keeping Children Safe in Education \(September 2018\)](#)

(Key statutory guidance for all schools, colleges and academies in England. It sets out what schools and colleges must do to safeguard and promote the welfare of children and young people under the age of 18.)

[NSPCC links \(General\)](#)

[Department for Education \(2015\) Boarding Schools: National Minimum Standards Regulations.](#)

[The Education \(Independent School Standards\) \(England\) Regulations 2014](#)

[Multi-Agency Practice Guidelines: Female Genital Mutilation](#)

[Multi-agency guidelines: Handling case of forced marriage](#)

[Prevent Duty 2015](#)

[Minibus guidance](#)

[Teaching Regulation Agency \(TRA\) - Guidance on teacher misconduct referrals](#)

[Adventure Activities Licensing Authority](#)

[Safer internet strategies](#)

[The use of Social Media for online radicalization July 2015](#)

[What to do if you're worried a child is being abused](#)

[Child Sexual Exploitation legislation February 2017](#)

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance Core Document 13.02.2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

[Sexual Violence and Sexual Harassment between children in schools and colleges \(December 2017\)](#)

Appendix C: Staff INSET training:

Safeguarding training in last three years (including e-safety and prevent)

Brief details	Staff attending	Date
Internet Safety with Karl Hopwood	All staff	3.2.18
Graffham – Level 1 Safeguarding	All employees	5.9.17
Graffham – Risk Assessment for Schools	All staff	19.4.17
Doug Melia – Safer Handling (www.safer-handling.co.uk)	Teaching staff	9.1.17
Graffham – Prevent Awareness	All employees	6.9.16
Safeguarding Policy Review	All employees	5.9.16
Graffham – Level 1 Safeguarding	All employees	18.04.2016
Channel – Prevent Training Online	Various staff	01.12.15

Health and safety training in last three years. (eg evacuation, fire etc)

Brief details	Staff attending	Date
Haydon Moore – Fire Marshall Course	Haydon Moore	28.4.16
Fire Safety Training– Chris Gilham – CT Fire Officer	All employees	18.04.16
Health and Safety in Education Level 2	Paddy Mason	10.3.17
Fire Safety in Education Level 2 (Educare)	James Tosh	10.3.17
Health and Safety in Education Level 2 (Educare)	James Tosh	14.3.17
Risk Assessment for Schools (Graffham)	All staff	19.4.17
Fire Marshall Training (St. John’s Ambulance)	William Koops	17.11.17
Fire Marshall Training (St. John’s Ambulance)	Tom Gloster	17.11.17
Fire Safety Training– Chris Gilham – CT Fire Officer	All employees	08.01.18
CLEAPSS Health and Safety Management for Heads of Design Technology	Josh Duarte	25.06.18

Designated Safeguarding Lead (DSL) training, (and DDSL, head and trustee) in last two years

Brief details	Staff attending	Date
Online Safety Level 2	Paddy Mason	27.2.17
FGM Awareness Level 2	Paddy Mason	21.2.17
Online Safety Level 2	Haydon Moore	21.2.17
An Introduction to CSE Level 2	Paddy Mason	20.2.17
Level 3 Child Protection For DDSL	Paddy Mason	1.2.17
Prevent Awareness for Schools (Online) England (Graffham)	Paddy Mason	13.1.17
An Introduction to CSE Level 2 (Educare)	Christine Clarke	16.5.17
FGM Awareness Level 2 (Educare)	Christine Clarke	16.5.17
Level 3 Safeguarding and Child Protection (Graffham)	Tom Gloster	12.10.17
An Introduction to CSE Level 2 (Educare)	Haydon Moore	17.10.17
FGM Awareness Level 2 (Educare)	Haydon Moore	17.10.17
Safer Recruitment in Education (Educare)	Haydon Moore	17.10.17
Child Neglect Level 2 (Educare)	Paddy Mason	18.10.17
DSL/DDSL Level 3 refresher with ESCC	Paddy Mason	8.11.17
DSL/DDSL Level 3 refresher with ESCC	Haydon Moore	8.11.17
Safer Recruitment in Education (Educare)	Paddy Mason	12.4.18
Child Protection Level 3 (Educare)	Victoria Mason	18.4.18
Preventing Bullying Level 2 (Educare)	Paddy Mason	28.4.18
Raising Awareness of Peer-on-Peer Abuse Level 2	Paddy Mason	24.8.18
Child Protection Level 3	Kerri Wyatt	5.9.18
Safer Recruitment in Education Level 2	Mike Davies	17.9.18

Other recent training

Brief details	Staff attending	Date
Paediatric First Aid	Chris Clarke	6.10.2015
Paediatric First Aid	Julie Corbin	6.10.2015
Medicines in school (Opuspharmserve)	Matrons/Medical	January 2017
Emergency First Aid at Work	Various staff	4.9.17
Paediatric First Aid	Sarah Brignell	4.10.17
Educare online courses available to all staff, to include safeguarding, the prevent duty, health and safety etc. (annual subscription)	Various	February 2017 onwards
Paediatric First Aid	Louise d'Alberthanson	9.2.18

A full list of staff training is available from the school office.

Appendix D:

Definitions of abuse and signs of a child in need or at risk and in danger

Staff should have an awareness of safeguarding issues some of which are listed below. **KCSIE September 2018, Annex A (page 75) contains important additional information about specific forms of abuse and safeguarding issues. All school leaders and those staff who work directly with children should read this Annex A, available here: <https://www.gov.uk/government/publications/keeping-children-safe-in-education-2>** . Staff need to be aware that behaviours linked to the likes of drug-taking, alcohol abuse, truancy and sexting put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

Staff should also be aware that there are different gender issues that can be prevalent when dealing with peer on peer abuse. This could, for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence (see part 5 of **KCSIE September 2018**). Please see the *Anti-bullying Policy* and *Promoting Good Behaviour Policy* for further information and how sexting will be dealt with.

A. Physical abuse and indicator signs

- I. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
- II. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- III. Indicators may include:
 - injuries that are not consistent with the explanation offered.
 - injuries not consistent with the child's age and development.
 - repeated injuries over a period of time.
 - runaway attempts and fear of going home.
 - stilted conversation, vacant stares or no attempt to seek comfort when hurt.
 - describes self as bad and deserving to be punished.
 - the child cannot recall how injuries occurred or offers an inconsistent explanation.
 - wariness of adults.

- frequent absence from school.
- flinching if touched unexpectedly.
- extremely aggressive or withdrawn.
- displays of indiscriminate affection-seeking behaviour.
- abusive behaviour and language in play.
- over compliance and/or eagerness to please.
- poor sleeping patterns, fear of the dark, frequent nightmares.
- sadness, frequent crying.
- depression.
- poor memory and concentration.

B. Emotional abuse and indicator signs

- I. Emotional abuse is the persistent emotional, maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.
- II. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age, or developmentally inappropriate, expectations being imposed on children.
- III. 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.
- IV. 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.
- V. Indicators may include:
 - Bedwetting and/or diarrhoea.
 - Frequent psychosomatic complaints, headaches, nausea, abdominal pains.
 - Mental or emotional development lags.
 - Behaviours inappropriate for age.
 - Fear of failure, over high standards, reluctance to play.
 - Fears consequences of actions, often leading to lying.
 - Extreme withdrawal or aggressiveness, mood swings.
 - Overly compliant, too well-mannered.
 - Excessive neatness and cleanliness.

- Extreme attention-seeking behaviours.
- Poor peer relationships.
- Severe depression, may be suicidal.
- Runaway attempts.
- Violence features as a subject for art or writing.
- Complains of social isolation.

C. Sexual abuse and indicator signs

- I. Sexual abuse involves forcing or enticing a child or younger person to take part in sexual activities, not necessarily involving high level of violence, whether or not the child is aware of what is happening.
- II. The activities may involve physical contact, including assault by penetration (e.g. rape, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- III. They may also include non-contact activities, such as involving children in looking at, or in the production of sexual images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). **Sexual abuse can take place online, and technology can be used to facilitate offline abuse.** Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. **The sexual abuse of children is a specific safeguarding issue in education.**
- IV. Indicators may include:
 - contact with other children is forbidden.
 - fatigue due to sleep disturbances.
 - sudden weight change.
 - cuts or sores made by the child on the body (self-harm).
 - recurring physical ailments.
 - difficulty in walking or sitting.
 - unusual or excessive itching in the genital or anal area due to infection(s).
 - torn, stained or bloody underwear.
 - injuries to the mouth, genital or anal areas (eg bruising, swelling, sores, infection).
 - sudden lack of interest in friends or activities.
 - hostility toward authority figures.
 - the need for constant companionship.
 - regressive communication patterns (eg speaking childishly).
 - academic difficulties or performance suddenly deteriorates.
 - truancy and/or running away from home.

- wearing layers of clothing to hide bruises.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual abuse. Signs include:

- inappropriate sexual or sexualised behaviour.
- receiving unexplained gifts or gifts from unknown sources.
- having multiple mobile phones and worrying about losing contact via mobile.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs).
- changes in the way the child dresses.
- getting in/out of different cars driven by unknown adults.
- contact with known perpetrators.
- involvement in abusive relationships, intimidated by and fearful of certain people or situations.
- associating with groups of older people, or anti-social groups, or with other vulnerable peers.
- truancy, exclusion, disengagement with school, opting out of education altogether.
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual).
- mood swings, volatile behaviour, emotional distress.
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- injuries from physical assault, physical restraint, sexual assault.

D. Physical neglect and indicator signs

- I. Neglect is 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.
- II. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.
- III. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- IV. Indicators may include:
 - unattended medical and dental needs.
 - consistent lack of supervision.
 - consistent hunger.
 - nutritional deficiencies.
 - inappropriate dress for weather conditions.

- poor hygiene.
- persistent (untreated) conditions (eg head lice or other skin disorders).
- development delays (eg language, weight).
- irregular or non-attendance at school or lateness.
- demands for constant attention and affection.
- lack of parental participation and interest.
- regular displays of fatigue or listlessness, falling asleep in class.
- lack of trust in others, unpredictable.
-

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

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education

F. 'Prevent duty' with regard to radicalization and extremism, and its reporting

- I. The school must, in the exercise of its functions, have due regard to the need to prevent members of staff and pupils from being drawn into terrorism.
- II. Extremism is 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.
- III. Schools can build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them understand how they can influence and participate in decision making. **Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.**
- IV. Indicators may include:
 - disclosures by pupils of their exposure to the extremist actions.
 - graffiti symbols, writing or art work promoting extremist messages or images.
 - pupils accessing extremist material online, including through social media.
 - parental reports of changes in behaviour.
 - pupils voicing opinions drawn from extremist ideologies and narratives.
 - use of extremist or 'hate' terms to exclude others or incite violence.
 - intolerance of difference, whether secular or religious or, in line with the school/s equal opportunities policy.
 - attempts to impose extremist views or practices on others.

- anti-Western or anti-British views.

G. Female genital mutilation (FGM) and its reporting

- I. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. (KCSIE Sept 2018)
- II. Staff need to be aware of FGM practices and the needs to look for signs, symptoms and other indicators of FGM either with regard to the pupils (if applicable) or with regard to the staff employed at the school.
- III. If a member of staff is informed by a girl under the age of 18 that she has undergone an act of FGM or they observe physical signs that an act of FGM may have been carried out on a girl under the age of 18, there is a mandatory duty to report any such cases, without delay, to the police (phone: 101). Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers.11** If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See p. 80-81 of Annex A of KCSIE Sept 2018 for further details.
- IV. Indicators may include a girl or woman:
 - having difficulty walking, sitting or standing.
 - spending longer than normal in the bathroom or toilet.
 - having unusual behaviour after an absence from school or college.
 - being particularly reluctant to undergo normal medical examinations.
 - asking for help, but may not be explicit about the problem due to embarrassment or fear.
- V. If a member of staff is worried or concerned about FGM please ring for help on: 0800 028 3550 or email at: fgmhelp@nspcc.org.uk.

H. Self-harm

- I. Self-harm is any behaviour where the intent is to deliberately cause self-harm.
- II. Self-harm can be a transient behaviour in young people that is triggered by particular stresses and resolves fairly quickly, or it may be part of a longer term pattern of behaviour.
- III. Indicators may include a child:
 - showing changes in eating/sleeping habits.
 - showing increased isolation from friends/family or giving away possessions
 - showing changes in activity and mood (e.g. more aggressive).
 - showing a lowering of academic grades.
 - talking about self-harming or suicide.
 - becoming socially withdrawn.
 - expressing feelings of failure, uselessness or loss of hope.

I. Honour based violence (HBV)

- I. HBV encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM (See above), forced marriages and practices such as breast ironing.
- II. All forms of HBV are abuse and staff should speak to the DSL if they are in any doubt. **If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see previous section). KCSIE September 2018**
- III. Please refer to the *Multi agency statutory guidance on FGM* and *Multi-agency guidelines: Handling the case of a forced marriage*

J. Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

<http://www.refuge.org.uk/get-help-now/what-is-domestic-violence/effects-of-domestic-violence-on-children/>

<http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

Please also refer to the following helplines which support both pupil and parents:

National Domestic Abuse Helpline – phone 0808 2000 247

24hr referral number for East Sussex Refuges – phone 07795 968 400

Wealden Housing Options Team – phone 01323 443 501

Wealden Sanctuary Scheme – phone 01323 443 380

Victim Support – phone 0845 30 30 900

Further information and guidance for East Sussex can be found at:

<http://www.eastsussexlscb.org.uk/professionals/prof-domestic-abuse/>

K. Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional or psychological. Whilst the children at Ashdown House are below the legal age of marriage, the school needs to be aware that this could be an issue for a child's family, friends, staff etc.

L. Peer on Peer Abuse

- I. Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.
- II. All staff should recognise that children are capable of abusing their peers. All staff should be clear about their school or college's policy and procedures with regard to peer on peer abuse.
- III. Procedures to minimise the risk of peer on peer abuse include education staff through INSET and the online training with Educare, education the pupils as part of their PSHEE programme and ensuring that there is adequate staff supervision;
- IV. allegations of peer on peer abuse will be recorded, investigated and dealt with by the DSL including any action taken;
- V. victims, perpetrators and any other child affected by peer on peer abuse will be supported through additional mentoring as well as a possible referral to the School Counsellor. (See also *the anti-bullying policy*);
- VI. Staff must recognise the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously; and
 - **the different forms peer on peer abuse can take, such as:**
 - (a) sexual violence and sexual harassment.
physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - (b) sexting (also known as youth produced sexual imagery): the policy should include the school or college's approach to it. The department provides searching screening and confiscation advice for schools. The UK Council for Child Internet Safety (UKCCIS) Education Group has published advice for schools and colleges on responding to sexting incidents; and
 - (c) initiation/hazing type violence and rituals.

M. Sexual Violence and Sexual Harassment between children

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 23 in Part 1 of KCSIE September 2018. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Appendix E: Use of mobile phones

A. Designated practitioner to take lead responsibility for safeguarding

- I. The school has a DSL who has received appropriate training and support for this role. Their training in child protection and inter-agency working is carried out every two years (as a minimum) for the designated person and deputies.
- II. The school has a nominated Trustee (governor) responsible for child protection. This Governor works closely with the DSL with regard to policy and procedure. The Board of Trustees undertakes an annual review of the Safeguarding (Child Protection) policy and procedures (as it does for the whole school).

B. Mobile phone and camera use

- I. The school recognises that staff, students and volunteers may wish to have their mobile phones at work for use in case of emergency. However, Safeguarding (Child Protection) of children within the school is paramount and personal mobile phones and other forms of electronic communication have the potential to be used inappropriately and therefore becoming a safeguarding issue. Therefore the following guidelines apply:
 - a. Personal mobile phones, cameras and video recorders cannot be used when in the presence of children either on school premises or when on outings, ONLY school equipment should be used. However, when this is not possible, personal mobile phones may be used in the event of an emergency.
 - b. Personal mobile phones must be turned off and left with personal belongings during contact time with children. School mobiles should be used, when possible, on site. However, a personal mobile phone may be taken, to be used in the event of an emergency, when school mobiles are in use elsewhere.
 - c. Cameras and mobile phones are prohibited in the loos, changing rooms, showers or nappy changing area and no parent or volunteer is permitted to use their mobile phone or use its camera facility whilst inside school buildings.
 - d. If a staff member or volunteer must use their mobile phone during working hours (such as in a family emergency) this should be done away from the children, whilst ensuring the staff supervision levels are not compromised.
 - e. The school telephone number can be used for emergencies by staff or volunteers or by people who need to contact them.
 - f. The school's digital camera/s or memory cards must not leave the site unless on a school trip. All memory cards should have images removed once the image has been transferred to the school drive.

- g. Photos are to be printed in the school by staff and images may be stored on the school drives before being removed from the camera's memory. (Please note that often such photographs may contain other children in the background).
- h. Photographs may be taken during indoor and outdoor play / activities and displayed in albums or a child's development records for children and parents to look through. (With appropriate permission from the parent).
- i. Events such as plays, sports day, outings, Christmas etc may be recorded by video and photographed by staff and parents, but always in full view of everyone attending.

Appendix F: Boarding

A. Arrangements for alternative accommodation should a member of staff be suspended pending an investigation

- I. Where a member of boarding staff is suspended pending an investigation of a child protection nature, immediate arrangements for alternative accommodation away from children will be made for the member of staff.

B. Peer-on-peer abuse.

- I. All staff, and particularly those involved in the pastoral care of our boarders, are highly conscious of pupil relationships, and in particular the increased potential for peer-on-peer abuse in the boarding community **which may also include sexual violence or sexual harassment. Sexual violence and sexual harassment are unacceptable and will not be passed off as 'banter' or 'part of growing up'. Staff should refer to Appendix D, paragraphs 'L' and 'M' of this policy for further detail regarding peer-on-peer abuse.**
- II. When dealing with abuse by young people on peers, Ashdown House will follow the key safeguarding documents, (*KCSIE 2018* and *Working together to safeguard children*) even when the alleged perpetrator is a child.
- III. Ashdown House will implement its usual safeguarding and anti-bullying policies and recognizes that sexualized abuse, including verbal abuse, by peers is a potential safeguarding issue.
- IV. **Children with SEND are likely to be more vulnerable**
- V. Ashdown House will seek advice from statutory agencies, as appropriate and readiness to make a referral if an incident meets the referral threshold set by the LSCB.
- VI. If a child is in immediate danger or is at risk of harm, the school will make an immediate referral to children's social care and/or the police.
- VII. Where allegations of abuse or assault have been made against one or more of its own pupils, a thorough risk assessment of the situation and risk based decision making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all pupils (including, day and boarding) and that both alleged victims and perpetrator pupils receive appropriate support. Decisions arising might include whether the accused pupils should be removed from the school for a period, or from certain classes, whether sleeping arrangements should be changed for boarders, whether contact with certain individuals should be prevented or supervised, the availability of counselling, the adequacy of arrangements for listening to children etc.

- VIII. Ashdown House will keep good records of related conversations, meetings and communications and ensure their security and confidentiality (where appropriate).
- IX. Ashdown House will follow the advice given : *What to do if you're worried a child is being abused*

Appendix G:

STAFF DECLARATION
(Confirming that this Safeguarding (Child Protection) policy
and Keeping Children Safe In Education 2018 (Part 1) and (Annex A) have been read
and understood)

To be completed by all members of staff

(Including all employees of the school
including volunteers and temporary staff)

I have read and I understand this Safeguarding (Child Protection) Policy. I agree to abide by the guidance, and enforce the rules, set out within it.

I have also read and I understand the contents of Keeping Children Safe in Education KCSIE Part 1 and Annex A (September 2018) **and that induction has been completed as per paragraph 9.3.2.**

Signed:

Print Name:

Date:

Please return this signed declaration to the DSL and it will be kept on record.