

SAFEGUARDING POLICY (Including the Child Protection Policy)

AIMS OF THE POLICY

Promoting and safeguarding the welfare of all boys at Tonbridge is one of our core duties. It is the responsibility of all School staff to safeguard and promote the welfare of our boys; specifically, it is to identify boys who may be in need of extra help or who are suffering, or are likely to suffer, significant harm, and to play their part in creating an environment where boys feel safe and can thrive and flourish thus building resilience and lowering the likelihood of harm. The School always considers the best interests of the boys, and all staff have a responsibility to take appropriate action, working with other services as appropriate. Tonbridge School fully recognises its safeguarding responsibilities and has in place a range of policies and procedures that collectively form a safeguarding framework. The aim of this policy is to provide specific guidance on the safeguarding provisions outlined in Keeping Children Safe in Education (KCSIE) and to outline the overall School framework within which these policies operate.

The aim of the School's Safeguarding Policy is to:

- Establish and maintain an environment where boys feel secure, are encouraged to talk, and are listened to.
- Ensure that boys know that there are adults in the School whom they can approach if they are worried.
- Ensure that the robust policies and procedures in place to protect boys from significant harm are understood by all, and that these are reviewed and scrutinised on an annual basis. Any deficiency or weakness in the safeguarding policies which emerge will be remedied without delay.
- Ensure that all unnecessary risks are managed, whilst acknowledging that risk cannot be eliminated from any environment.
- Include opportunities in the PSHEE curriculum for boys to develop the skills they need to recognise and stay safe from abuse, and to help them learn how to manage risks, including those they may encounter online.

In addition, this policy, alongside regular training, will provide all staff with the necessary framework and information to enable them to meet their child protection responsibilities, and will contribute to a consistent application of safeguarding practice throughout the School. The policy follows guidance and procedures outlined by the Kent Local Safeguarding Children Board. Further details of these local procedures can be found at: <http://www.kscb.org.uk/>.

The School's Safeguarding Policy takes into account the following legislation and guidance:

- Section 175 of the Education Act 2002
- Education (Independent Schools Standards) (England) Regulations 2014
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children (July 2018)
- Keeping Children Safe in Education (September 2018)
- Information Sharing (July 2018)
- What to do if you're worried a child is being abused (March 2015)
- Guidance for Safer Working Practice for Adults who work with Children and Young People (2015)
- Preventing and Tackling Bullying; Advice for School Leaders, Staff and Governing Bodies (July 2017)
- Use of reasonable force (July 2013)
- Teacher Misconduct: the prohibition of teachers (October 2015)
- Boarding Schools: National Minimum Standards (April 2015)
- KSCB Kent Support Levels Guidance Sheet
- The Prevent duty: Departmental advice for Schools and Childminders (June 2015)

- Prevent Duty Guidance: for England and Wales (July 2015) (Prevent)
- The use of social media for on-line radicalisation (June 2015)
- Children Missing Education (September 2016)
- Tackling Child Sexual Exploitation (March 2015)
- The use of social media for online radicalisation (June 2015)
- Sexting in schools and colleges: responding to incidents and safeguarding young people UKCCIS 2016
- County Lines Violence, Exploitation & Drug Supply, National Crime Agency, (November 2017)
- Sexual violence and sexual harassment between children in schools and colleges (May 2018)

REFERENCE TO OTHER SCHOOL POLICIES

This Safeguarding Policy should be read in conjunction with the School policies listed below:

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| • Child Protection (within this document) | • Self-Harm |
| • Anti-Bullying | • Behaviour, Rewards and Sanctions |
| • Cyberbullying | • PSHEE |
| • Whistleblowing | • Physical Restraint |
| • Health and Safety | • Searching and Confiscations |
| • Staff Handbooks and Code of Conduct | • Complaints Procedure |
| • Online-Safety | • Boy Who Has Gone Missing |
| • Trips | • Pupil Supervision |
| • Staff Recruitment | • Attendance |
| • Emerging Technologies and Use of New Media | • Drugs |
| • Taking, Storing and Using Images of Pupils | • The Prevent Duty at Tonbridge School |
| | • Mobile Phone Use Policy |

This policy will be freely available to parents on our website and a hard copy provided on request.

MANAGEMENT OF THE POLICY

The Second Master will provide oversight of the Safeguarding Policy. He is supported in this role by the Bursar (who shares the Health and Safety responsibility) and with the Upper and Lower Masters and Sports Centre Manager (who share the Safeguarding and Child Protection responsibilities). Other staff with safeguarding experience may contribute to the contents of the policy.

More fundamentally, all staff in all contexts are responsible for ensuring that safeguarding is given the highest possible priority. Any concerns with regards to safeguarding should be reported in the first instance to the Second Master, although it should be noted that **anybody can make a referral in exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken. Staff can contact the West Kent Area Safeguarding Adviser for advice or contact KSCB directly.** Contact details of relevant agencies are in Section 3. of this policy.

It is the role of the Governing Body to provide scrutiny of Safeguarding Policy and practice. The Chairman of Governors formally approves this policy after discussion at the full Governing Body in the Michaelmas Term. Any subsequent amendments are jointly approved by the Chair of Governors and the Chair of the Governors' Pastoral Committee. The Pastoral Committee provides regular oversight of safeguarding policy and practice in the School and is chaired by Mr Andrew Mayer who is the Governor with specific responsibility for Child Protection and Health and Safety. Mr Mayer is nominated by the Governing Body to liaise with the Local Children's Safeguarding Board on issues of child protection as required.

Any child protection or safeguarding issue which is deemed to have posed significant harm to a young person, any suspicions of abuse or information relating to allegations outside of School will be referred by the Second Master (in consultation with the Headmaster) to the Kent Safeguarding Children Board. Allegations against members of staff or adults working at the School should be referred by the Headmaster immediately to the LADO team (see section 2. for detailed guidance). If a suspected criminal act has been committed, then the police will also be informed.

TRAINING AND INDUCTION

Tonbridge School recognises the importance of staff training to enable them to identify the possible signs of abuse and/or neglect, and to know what to do if they have a concern. All new staff, Governors, part-time staff, volunteers and Praepostors will receive Child Protection training as part of their induction process, including the contents of this policy. We will ensure that all staff read and understand at least Part one of the DfE guidance 'Keeping Children Safe in Education' (2018) and, for certain staff who work directly with children, Annex A of that document. CPD is essential to any effective Safeguarding Policy; consequently, and in addition to the training provided by KSCB, all staff receive update training in Child Protection on a regular basis, and at least annually. This training will include Online Safety training. The DSL and the deputy DSLs update their training at least every two years with the KSCB and at other times as necessary.

I. CHILD PROTECTION POLICY

Aims

Tonbridge School aims to provide an environment in which there are effective procedures for safeguarding and promoting the welfare of all boys in our care. The School starts from the premise that the welfare of the child is paramount. We aim to establish an ethos where boys feel secure, know that there are adults to whom they can talk in times of difficulty and where positive steps are taken to build self-esteem and confidence. We also recognise the importance of working with other agencies such as social care, the police, health services and other agencies to ensure the welfare of children under our protection. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child in need or child protection plans. Tonbridge School adheres to Child Protection procedures that have been agreed locally with the Kent Safeguarding Children Board and is subject to regular scrutiny and review by the Governing Body. The Chairman of the Governors' Pastoral Committee conducts an annual Safeguarding Audit, submitted to the Governing Body, in which he reviews the School's Safeguarding and Child Protection Policy and practice. The Second Master discusses Safeguarding issues on a termly basis in the Governors' Pastoral Committee meetings and submits an annual Safeguarding Report to the Governing Body for review and discussion.

There are two main elements to our Child Protection Policy:

- a. Preventing threats to boys' welfare by creating a safe School environment and a strong pastoral system.
- b. Protecting those in our care by following agreed procedures and ensuring the School follows robust safe recruitment procedures. Once appointed, staff are appropriately trained, appraised and supported to respond appropriately to child protection concerns. The School also has robust procedures in place for external contractors and agencies.

This policy applies to all teaching, non-teaching and volunteer staff, and to School Governors. Tonbridge School also recognises that occasionally young people may be harmed by other young people, and that there may be rare occasions when a boy's behaviour warrants a response under child protection rather than anti-bullying procedures. See the section on Peer-Peer abuse for more details.

Roles, Responsibilities and Training

All adults working with children have a responsibility to safeguard and promote their welfare and staff should be aware of their roles in safeguarding children, identifying those in need of early intervention and supporting a pupil in receipt of Early Help. There are however, key people within Tonbridge School who have specific responsibilities:

The Second Master, Dr P.H. Williams, is the Designated Safeguarding Lead (DSL) to whom all safeguarding and child protection issues should be notified (apart from an allegation of abuse against a member of staff, which must be reported directly to the Headmaster). The Second Master will report on such issues to the Headmaster. The DSL (or in his absence his deputies) is responsible for the management of referrals, training of all staff and ensuring that all staff and Governors know School Policy and implement it appropriately. See Annex I of this policy for the Job Description of the Designated Safeguarding Lead(s).

The Upper Master, Mr. J.R. Bleakley, the Lower Master, Mrs J.H. Green, and the TSC Manager, Mr A. Lloyd have all received training for DSLs and can deputise for the Second Master. In the absence of the Second Master, the Upper Master will take the lead.

Mr. Andrew Mayer chairs the Governors' Pastoral Committee which has responsibility for Safeguarding and child protection issues.

The DSL and his deputies will update their training in child protection and inter-agency working at least every two years, but usually annually, by a recognised external provider (usually KCC). The Headmaster and all teaching and support staff, along with the Governors will receive training at least annually from the DSL, his deputies or an external provider. This may be in the form of email updates, in staff meetings, or via seminars or talks during INSET at the beginning of terms, or at other times. In addition, all staff (including temporary staff and volunteers) will be provided with an induction that includes:

- The School's Safeguarding (including the Child Protection) Policy
- The Staff Code of Conduct
- The Whistleblowing Policy
- The Acceptable Use of Computers (Staff) Policy
- The identity of the Designated Safeguarding Leads
- A copy of Part I of KCSIE

Additional policies will be included for new members of staff whose role involves working directly with boys.

Those members of management involved in recruiting staff are required to operate safe recruitment procedures in line with the statutory guidance set out in KCSIE. There will always be at least one member on any recruitment panel who has completed appropriate safer recruitment training.

All members of staff, both teaching and non-teaching, should be able to recognise signs of child abuse and be familiar with the correct procedures for communicating their concerns. They must also ensure that their behaviour and actions do not place boys or themselves at risk of harm or of allegations of harm to a boy. There is guidance relating to staff conduct in the Tonbridge School Handbook and the Staff Code of Conduct. All should be aware of the School's Whistleblowing Policy and the way that this impacts on issues of child protection, and the notes on confidentiality set out in the Pastoral Handbook. All staff are issued with Child Protection cards by the Second Master or Personnel Manager.

What is child abuse?

Abuse. This is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. All staff should be aware that

abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Physical abuse. A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when an adult or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse. The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Neglect. The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Sexual abuse (see also sections on Youth Produced Sexual Imagery (Sexting) and peer-peer abuse). Sexual abuse involves forcing or enticing a child to take part in or watch sexual activities, not necessarily involving 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. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Child sexual exploitation (CSE) 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 online or via technology.

CSE:

- 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 (through others copying videos or images they have created and posting on social media, for example);
- 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

We recognise that CSE is never the victim's fault, and are guided by recent government advice, as quoted from above. We will refer immediately to Children's Services where it comes to our notice that a child under the age of 18 may be vulnerable to sexual exploitation.

Some indications of possible abuse

- Unusual, even bizarre behaviour
- Unexplained injuries
- Emotional withdrawal – showing lack of trust in adults
- Eating problems
- Not growing or putting on weight
- Timid and withdrawn
- Over-demanding, mood swings, aggressiveness
- Poor academic work, under-achievement
- Tiredness
- Persistent absence from school or lessons
- Inadequate standards of dress or personal hygiene

For more information visit: <http://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>.

Behaviour that is out of character for a given boy is not in itself an indication of abuse. Any staff concerned about a boy's behaviour or demeanour should however report it to the boy's Housemaster, who is in the best position to see the fuller picture and may already have other evidence leading to concern. It is also important to be aware of the possibility that abuse can also be perpetrated by one boy against another (see guidance below).

Contextual Safeguarding

Professionals should consider the context within which incidents and/or behaviours occur. Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Procedure to follow by a member of staff if abuse is suspected or reported

If any member of staff:

- Suspects that child abuse is occurring;
- Identifies child abuse;
- Is concerned that School practices or the behaviour of others may be putting a child at risk of abuse;
- Has an incident, complaint or suspicion reported to him/her.

He/she must:

- Make brief notes at the time or as soon as possible afterwards and ensure that these original notes are kept;
- If required, complete the body map recording sheet available on the Second Master's page on Friefly to record any injuries observed;
- Immediately stop any other activity to listen;
- Not ask leading questions (it may prejudice the investigation);
- Not give guarantees of confidentiality but provide assurance that only those who need to know will be informed;
- Not make any attempt to investigate the incident themselves;
- Preferably immediately, but in any case within twenty-four hours, inform the Designated Safeguarding Lead (the Second Master). If the concern/complaint is likely to involve the Second Master, the informant must report it to the Headmaster.

Subsequent action taken by the DSL and/or the Headmaster

The DSL, in conjunction with professional safeguarding advice from the West Kent Education Safeguarding Team and with reference to the Kent Support Levels Guidance Sheet, will decide upon any action needed to ensure the immediate protection of the boy concerned and any further investigation. Depending on the nature of the information received (and following consultation with the Education Safeguarding Team), the DSL, taking into account the context of the situation within and outside School as much as possible, will decide whether a boy requires additional support from one or more agencies (with a likely referral to the School Welfare Group) or whether a boy (who has been or is at risk of serious harm) should be reported to children's social care immediately. The 'Single Request for Support Form' is accessed via the KSCB 'Front Door' (<https://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/front-door>) and, when completed, should be uploaded via '<https://www.kent.gov.uk/singlerequestupload>'. Guidance on completing the form is available (https://www.kelsi.org.uk/data/assets/pdf_file/0004/86449/Single-Request-for-Support-form-guidance.pdf).

If a boy is or may be at risk of harm, the School does not require the consent of parents to make a referral.

Records and Monitoring

Well-kept records are essential to good child protection practice. All incidents relating to child protection must be recorded (email is acceptable), together with any accompanying notes. These must be given to the DSL, who will ensure that these are stored securely. The DSL will also ensure that details are given to any other person who needs to know about the particular child under threat, and who might be involved in the monitoring of that child. The DSL will also be responsible for liaising with any other agencies to whom a referral might be warranted, taking account of the GDPR and the Data Protection Act 2018, noting the condition that 'safeguarding of children and individuals at risk' is a processing condition that allows appropriate sharing of special category personal data. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. When a boy moves school, in addition to handing over any child protection file securely, the DSL will consider the appropriateness of sharing information proactively with the new school to enable the new school to have support in place when the boy arrives, and to ensure that key staff, such as the DSL and SENCO, are aware of any needs.

Peer-peer abuse: abuse by one or more boys against another boy

Tonbridge School also recognises that occasionally young people may be harmed by other young people, and that there may be rare occasions when a boy's behaviour warrants a response under child

protection rather than anti-bullying procedures. The School will always act in the interests of any boy at risk of or actually suffering from harm. Such cases might include online behaviour, physical abuse, bullying, sexual violence, sexual harassment, drug taking, or 'youth produced sexual imagery' (previously designated as sexting), initiation/hazing type violence and rituals. Some of these may be viewed by some boys as 'banter' or 'part of growing up', but the School does not accept any context for these behaviours and the same safeguarding procedures should be followed. Intimate physical relationships are not permitted between boys whilst at School including in their Houses, and the School recognises that this is one area where peer on peer abuse may be more likely. Staff are aware of the risks, and routines and expectations of boys' behaviour minimise the likelihood.

The School recognises that children can be responsible for sexual violence and sexual harassment against other children, as described in the DfE advice 'Sexual violence and sexual harassment between children in schools and colleges', May 2018 and in Part 5 of KCSIE, September 2018. **The School's responses are underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.** Some situations are statutorily clear:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape;
- rape, assault by penetration and sexual assault are defined in law;
- creating and sharing sexual photos and videos of under-18s is illegal. This includes children making and sharing sexual images and videos of themselves.

However, reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. **Any member of staff or boy who has a concern about sexual violence or sexual harassment should immediately report this to the DSL.** The DSL will consider the response on a case by case basis, but will follow the local referral procedures, guidance in 'Sexual violence and sexual harassment between children in schools and colleges', May 2018, Part 5 of KCSIE, September 2018 and will seek advice from the Area Education Safeguarding Officer. Staff should be aware that Children with SEND are more likely to be victims of sexual violence.

Any serious or criminal allegation should be referred to local agencies and the police. It is also the case that a bullying incident may be treated as a child protection incident where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In these situations, the DSL should be informed at the earliest possible opportunity. It would be an expectation that, in the event of disclosures about boy on boy abuse, all those involved, whether perpetrators or victims, are treated as being "at risk" and would be offered support through the School pastoral systems, including the School Counsellor or, if necessary, via independent counsellors.

Youth Produced Sexual Imagery (Sexting)

While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible effects on a child's wellbeing if imagery of this nature is shared beyond their control. In certain circumstances the DSL may have to refer an incident of this nature to the police, but Schools are not obliged to do this in all cases, as detailed in UKCCIS' 2016 publication 'Sexting in schools and colleges: responding to incidents and safeguarding young people'.

Staff should refer to the DSL any incidents where it is thought that explicit or sexual images of young people may have been made, distributed by or be in the possession of, a boy. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences and staff should take any direct disclosure very seriously. Staff **must not** request to view the imagery but should confiscate a device which contains suspected imagery and pass this on to

the DSL. The DSL, with input from the Headmaster, will follow the guidance set out in 'Sexting in schools and colleges: responding to incidents and safeguarding young people', including conducting an initial review meeting and considering, in certain circumstances, immediate referral to police or children's social care.

If, following consultations with outside agencies, further external engagement is not considered necessary, the DSL will work with appropriate pastoral staff such as the Housemaster and School Counsellor and, in most cases the boy's parents, acting in the best interests of the boy to ensure that he is safeguarded, supported and educated.

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and such cases would always be referred to the police.

Preventing Radicalisation under The Counter-Terrorism and Security Act: Identifying boys at risk of involvement in extremist behaviour

Exposure of children to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for sexual exploitation. The School recognises that safeguarding against exposure to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as protecting children from other risks, with the DSL being the point of contact for anyone with concerns. Relevant contact details can be found in Section 3. of this document. The DSL assesses the risks in relation to the Prevent Duty and monitors online activity for searches or content of concern, and all staff are responsible for checking the suitability of external speakers, with any concerns referred to the DSL. The School will ensure that staff are able to identify boys who may be vulnerable to radicalisation, know what to do when they are identified and have an awareness of the Channel Programme.

Details of the KSCB procedures and further guidance can be found on the following sites:

<http://www.kscb.org.uk/guidance/extremism-and-radicalisation2>

<http://www.kelsi.org.uk/child-protection-and-safeguarding/prevent-within-schools>

Female Genital Mutilation (FGM) and Honour Based Violence (HBV):

Despite this being a School for boys, staff need to be alert to the possibility of a girl (e.g. the sibling of a boy at Tonbridge) being at risk of FGM, or already having suffered FGM, or being at risk of involvement in HBV. **There is a mandatory duty to report FGM to the police.** Victims of FGM are likely to come from a community that is known to practise FGM. HBV can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. If you think that a child may be at risk of female genital mutilation or if you suspect that FGM has already happened, even if it is not recent, you must seek help and advice. Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day. Staff with any concern must contact the DSL who will activate appropriate safeguarding and referral procedures. Relevant contact details are available in Section 3.

The Use of School Premises by Other Organisations:

Where services or activities are provided separately by another body using the School premises, the School will seek assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks

have been made in respect of staff and volunteers. If assurance is not achieved, an application to use premises may be refused.

Children Missing From Education:

The School understands its duty in relation to the risks posed by children missing from education. All children, regardless of their circumstances, are entitled to a full-time education that is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect and the School will be proactive in supporting parents and boys who are missing School for any reason. The School will report to the Local Authority instances of prolonged unauthorised absence or of a boy being removed from the School's list under the circumstances outlined in KCSIE and 'Children Missing Education', September 2016. <https://www.kent.gov.uk/education-and-children/schools/school-attendance/children-missing-education>

Private Fostering:

A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. The School will report to the Local Authority any instances of Private Fostering of boys.

Gangs:

The School is aware of the risks posed to young people by criminal gangs as explained in advice from the National Crime Agency about County Lines and child criminal exploitation (November 2017). This emphasised the role of urban gangs supplying drugs to suburban areas, and also to market and coastal towns, taking advantage of vulnerable people and children. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County Lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. A young person's involvement in County Lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them.

Some indicators of County Lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from School or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones;
- Excessive receipt of texts /phone calls;
- Relationships with controlling / older individuals or groups;
- Leaving home / care without explanation;
- Suspicion of physical assault / unexplained injuries;
- Parental concerns;
- Carrying weapons;
- Significant decline in school results / performance;
- Gang association or isolation from peers or social networks;
- Self-harm or significant changes in emotional well-being.

Where there are concerns that a young person may be drawn into gang activity, staff should report this to the DSL in the first instance who will refer using the Local Safeguarding process.

Children with Special Educational Needs and Disabilities (SEND):

Children with SEND can provide additional safeguarding challenges. Staff should be aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include: Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration; children with SEND can be disproportionately impacted by things like bullying - without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

One-to-One Situations:

Staff working in one-to-one situations with boys are potentially more vulnerable to allegations. It therefore makes sense to plan and conduct such meetings to ensure that the security of both boy and staff are met. It is recommended that such meetings should take place where there is visual access and/or an open door. It is also strongly recommended that notes are kept of any meeting likely to be difficult, and consideration given to having another member of staff in the room or close by. If any boy becomes distressed or angry in any such meeting, always report this to a senior colleague. If anyone employed by the School is regularly in a one-to-one situation with boys, a risk assessment can be undertaken. Staff whose roles specifically require one-to-one teaching, such as visiting instrumental music teachers, work in rooms with visual access.

2. ALLEGATION AGAINST A MEMBER OF STAFF

Introduction

Tonbridge School is committed to providing the highest level of care for both its boys and its staff. It is extremely important that any allegations of abuse against a teacher, any other member of staff, or volunteer in the School is dealt with thoroughly and efficiently, maintaining the highest level of protection for the boy whilst also giving support to the person who is the subject of the allegation. Our policy is in line with statutory guidance from the Department for Education as detailed in Part Four of Keeping Children Safe in Education (September 2018).

This policy is designed to ensure that all staff, boys and parents or carers are aware of the procedure for the investigation of allegations of abuse in order that all complaints are dealt with consistently, and as efficiently as possible.

We hope that having a clear policy outlined will help boys to feel comfortable that they can voice concerns about any member of staff. Allegations will be reported to the Headmaster immediately or to the Chair of Governors where the Headmaster is the subject of concern. All allegations will be taken seriously, and appropriate action will be taken immediately.

Purpose

The procedure for dealing with allegations against staff depends on the situation and circumstances surrounding the allegation. This policy must be followed when dealing with allegations but may be adapted to each case as advised by external agencies. This policy will be used alongside the School's Complaints Policy, Whistleblowing Policy, Disciplinary policies and the Safeguarding and Child Protection Policy.

This policy will be used in any case where it is suspected or alleged that a member of staff, a teacher or a volunteer at the School has:

- Behaved in a way that has harmed a boy or may have harmed a boy;
- Possibly committed a criminal offence against or related to a boy; or

- Behaved towards a boy or boys in a way that indicates he or she may pose a risk of harm to children.

Timescale

It is imperative that allegations against staff are dealt with as efficiently as possible to:

- Minimise the risk to the boy making the allegation and to other boys;
- Minimise the impact on the boy's academic progress;
- Ensure a fair and thorough investigation for all parties.

To enable this to happen, all staff, parents, and boys should be aware of the procedures set out in this policy.

Procedure

i. Reporting an allegation

All concerns of poor practice or possible child abuse by staff should be reported immediately to the Headmaster. Complaints about the Headmaster should be reported to the Chair of Governors who will then contact the Local Authority Designated Officer (LADO) Team.

Members of staff who are concerned about the conduct of a colleague towards a boy are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. **However, all staff must remember that the welfare of the boy is paramount and must report their concerns immediately.**

The Headmaster, who may also discuss the situation with the Designated Safeguarding Lead, will contact the LADO team as soon as possible and in any case within 24 hours and a discussion will take place to decide any next steps. All allegations should be referred to the LADO team for advice **before any investigation by the School takes place**. In borderline cases, these discussions can be held informally without naming the individual. Any formal referrals must be done via the completion of a Kent LADO Referral Form, available at: <http://www.kscb.org.uk/procedures/local-authority-designated-officer-lado>. In the case of serious harm or criminal activity the police should be informed from the outset.

The School will share available information with the LADO about the allegation, the boy, and the person against whom the allegation has been made and consider whether a police investigation or a strategy discussion is needed or whether no further action is required. Representatives from other agencies may be invited into the discussion and could include representatives from health, social care, the GP and police.

ii. Investigation

An investigation into the allegations is normally carried out by children's social services or by the School. This will be agreed with the LADO team at the initial evaluation stage. Where the School is not conducting the investigation, it will cooperate with investigative agencies.

Internal investigations must be second to any safeguarding investigation and may need to be delayed until the external investigation is complete.

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

- Substantiated: there is sufficient evidence to prove the allegation;

- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

iii. Supporting those involved

a. The boy(s) making/implicated by an allegation and his/their parents/carers:

Unless there is direction to the contrary from the police or Social Services, Parents and carers will be notified if their son makes or is involved in an allegation against staff if they do not already know. Parents and carers will be made aware of any progress in the investigation, and where there is no criminal prosecution, the outcome will be explained to them. This may be a disciplinary outcome. During a disciplinary hearing the deliberations and information used for making a decision are usually confidential, but parents will usually be told the outcome.

Boys (and their parents or carers) will be offered support by the School Counsellor and the School will work with and support outside agencies who offer specialist services to the boy and his family. All reasonable precautions will be taken to limit the number of people made aware of the allegations.

Social services and the police may be involved, depending on the severity of the case, and will provide the School with advice on what type of additional support the boy and his family may need.

The boy and his parents and carers will be made aware of the law requiring confidentiality to be maintained while investigations are ongoing (see CONFIDENTIALITY, below).

b. A member of staff making an allegation:

The School's Whistleblowing Policy enables staff to raise concerns or allegations against their colleagues in confidence and for a sensitive enquiry to take place.

c. The employee against whom an allegation is made:

Tonbridge School has a duty of care to its employees and will do everything it can to minimise the stress of any allegations, investigations and the possible subsequent disciplinary process.

The person who is the subject of the investigation will be informed as soon as possible after the allegation has been made, but only after this has been agreed with the LADO team, social services or police, who will advise as to what information may be disclosed, and once the Headmaster has spoken to the Chair of Governors. The employee will then be advised on the next course of action. They will be advised to contact their Trade Union or other professional body representative, if they have one, and will be provided with a named representative whose role will be to keep the subject of the investigation informed of the progress of the case and consider what other support is appropriate for the individual.

If the allegation is against a member of the residential boarding staff (such as a Housemaster or Assistant Housemaster) and that member of staff is suspended from duty as a result of the allegation, the School will provide alternative accommodation for that member of staff for the duration of the investigation.

The employee may need additional support and the School will consider what might be appropriate to best accommodate this. If there is a criminal investigation and the police are involved, they may provide this additional support.

Confidentiality

The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence, as set out in section 141F of the Education Act 2002, to publish information (including 'any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public') that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence.

Suspensions

All options to avoid suspension will be considered prior to making the decision to suspend a member of staff. The School will not suspend a member of staff without serious consideration and will not do it automatically once an allegation has been made. Depending on the nature of the case, it may be possible that alternative arrangements are made so that the individual can continue working, but is removed from contact with the boy making the allegation.

A suspension may be decided upon if it is deemed that the boy or other boys may be at risk of harm, the case is so serious that it might be grounds for dismissal or if the nature of the case warrants a criminal investigation. The Headmaster holds the power to suspend an employee but will be advised by the police, LADO Team or Social Services whether or not a suspension is advisable. The decision to suspend, or not, will be kept under review. Similarly, if the member of staff is suspended, whether or not to continue to suspend will be kept under review by the Headmaster.

Where there is a chance of suspension, the employee will receive confirmation within one working day and will be informed of the reason for the suspension as well as a named contact within the School.

Resignations

If an employee hands in their resignation when the allegation is made or during an investigation, the investigation will continue until an outcome has been reached, with or without the person's cooperation. The employee will be given full opportunity to answer the allegation.

Settlement Agreements will not be used in situations which are relevant to these procedures. The School may refer the individual to external agencies as described below.

Record Keeping

Detailed records must be kept of allegations and all actions and decisions subsequently taken during the course of an investigation. Details of allegations, investigations and outcomes will be kept in the personal file of the person who has been under investigation. This will enable the School to:

- Provide all the necessary information for future schools if they require a reference. Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. Where DBS checks highlight incidents of allegations that did not result in any criminal charges, records will need to show exactly what happened, what points of action

were taken during and after the investigation, and how the conclusion of the investigation was reached.

- Prevent unnecessary re-investigation in the future if an allegation re-surfaces.

The record will be kept, including for people who leave the organisation, at least until the person reaches normal retirement age or for 10 years if that will be longer*, from the date of the allegation.

**During the course of the Independent Inquiry into Child Sexual Abuse, records that may be required by the Inquiry will not be destroyed.*

Allegations that are proven to be malicious will not be kept on employment records or used in employee references. The records will be kept by the School.

Details of any allegation made by a boy will be kept in the confidential section of their record.

Action on the conclusion of the case

The Headmaster is required to refer any colleague who is deemed unsuitable to work with vulnerable and young people and who has been removed from regulated activity to the Disclosure and Barring Service (DBS). If the investigation results in the dismissal or resignation of a person, and that person has been charged with a criminal offence, a referral will be made immediately by the School to the Disclosure and Barring Service and the Teacher Regulation Authority (TRA). Where the threshold for referral to the DBS has not been met, separate consideration should be given to a referral to the Teacher Regulation Authority (TRA). Such a referral may be in relation to unacceptable professional conduct, conduct that might bring the profession into disrepute or a conviction at any time for a relevant offence. The School may be advised on this by the police and/or social services.

If it is decided that the employee may return to School (after a suspension) then provisions will be put in place by the School to ensure that the transition is as smooth as possible. This may involve a phased return for a trial period or the use of another member of staff as a support system in the short term. If the boy who made the allegation is still at the School, the School will consider what needs to be done to manage the contact between employee and boy and to best support each party.

Action in the case of false allegations

Where an allegation made by a boy is proven to be false or malicious, the Headmaster and Chair of Governors may refer to social services to determine whether the boy is in need of special care, or to help to understand if they are being abused elsewhere.

Additionally, if an allegation made by a boy is found to be intentionally false or malicious, the Headmaster will decide what the proper sanction will be for the boy who made the allegation.

A malicious accusation made by a member of staff is a disciplinary offence and may also be a criminal offence. If the police do not intend to pursue this, the School's possible actions are described in the Disciplinary Policy and Procedures.

If a false or malicious claim has been made by a person who is not a boy or member of staff, the School will hand the information over to the police who may take further action against that person.

After the case

No matter what the outcome is of an allegation of abuse against staff, the School will review the case to see if there are any improvements that can be made in its practice or policy that may help to prevent similar cases in the future.

3. Relevant Contact Details

Governor Chair of the Pastoral Committee:

Mr Andrew Mayer
01732 454922

Designated Safeguarding Lead:

Dr P. Huw Williams, Second Master. 01732 304299 and 07745 086381.
huw.williams@tonbridge-school.org.uk

Deputy Designated Safeguarding Leads:

Mr John Bleakley, Upper Master.	01732 365555	john.bleakley@tonbridge-school.org.uk
Miss Josie Green, Lower Master.	01732 365555	josie.green@tonbridge-school.org.uk
Mr Alex Lloyd, TSC Manager.	01732 304111	alex.lloyd@tonbridge-school.org.uk

Independent Schools' Inspectorate:

CAP House, 9-12 Long Lane, London, EC1A 9HA
Tel: 020 7600 0100 Email: concerns@isi.net

The Office of the Children's Commissioner:

Anne Longfield, Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT
Tel: 020 7783 8330 Email: info.request@childrenscommissioner.gsi.gov.uk
Website: www.childrenscommissioner.gov.uk
Care and Protection Team Helpline (advice and assistance)
Tel: 0800 528 0731 Email: advice.team@childrenscommissioner.gsi.gov.uk

Local Authority Designated Officer (LADO) Team:

Tel: 03000 410888
Email: kentchildrenslado@kent.gov.uk or via secure: gcsxsafeguardingunit@kent.gcsx.gov.uk

Kent Social Services:

Integrated Front Door (for enquiries and referral advice): 03000 41 11 11
Central Duty Team (Out of Hours) 03000 41 91 91

Kent and Medway Safeguarding Children Procedures can be found at:

<http://www.kelsi.org.uk/> and <http://www.proceduresonline.com/kentandmedway/>

The Area Safeguarding Adviser (for West Kent) is:

Gemma Willson, Worrall House, 30 Kings Hill Avenue, West Malling, ME19 4AE
Tel: 03000 412284 / 07540 677200 Email: gemma.willson@theeducationpeople.org

Childline:

Tel: 0800 1111
Website: www.ChildLine.org.uk

NSPCC Whistleblowing Advice Line:

Telephone: 0800 028 0285
Email: help@nspcc.org.uk

FGM Helpline: You can call 101 to report suspected or known cases of FGM. The Childline helpline is 0800 028 3550, email fgmhelp@nspcc.org.uk. **If you think a child is at immediate risk, call 999.**

The contact details for DBS referrals are:

PO Box 181, Darlington, DL1 9FA
Tel: 01325 953 795

TRA Teacher Misconduct:

<https://www.gov.uk/government/publications/teacher-misconduct-referral-form>

Department for Education: dedicated telephone helpline and email address for non-emergency advice for staff and governors relating to radicalisation and the Prevent Duty: 020 7340 7264 and counter.extremism@education.gov.uk

Non-emergency police number (for advice regarding Prevent Duty):
Telephone: 101

Reporting Radicalisation or Extremism (Prevent). <https://www.kent.gov.uk/about-the-council/strategies-and-policies/community-safety-and-crime-policies/contest/prevent>

Kent Early Help and Preventative Services: EarlyHelpNotificationT&M@kent.gov.uk or 03000 421576

4. SAFER RECRUITMENT

Tonbridge School does all it can to ensure that we employ 'safe' staff by following the guidance in 'KCSIE (Sept 2018)' and operating safe recruitment procedures in the appointment of all staff.

Tonbridge School recognises its duty to refer to the DBS any colleague who is deemed unsuitable to work with vulnerable and young people and who has been removed from regulated activity. All employees of the School, including unsupervised volunteers and adults (including spouses and adult children living in boarding accommodation), undergo an enhanced DBS check. There may be occasions when a DBS clearance has failed to arrive before an employee of the School begins work. In these situations, an employee may commence employment without an enhanced DBS disclosure if:

- he/she arrives directly from employment in another school setting (alongside the checks outlined below) or,
- in exceptional circumstances, with approval from the Second Master or the Bursar alongside all required checks on: identity; right to work in the UK; a check of the Barred List; a risk assessment focusing on adequate supervision.

Where the School employs contractors, the Bursar and Estates Bursar ensure that the terms of any contract they enter into requires the contractor to employ staff to work with, or provide services for the School, to adopt and implement the measures described in this policy. They are also to monitor the contractor's compliance and are to request that the contractor provides evidence of having obtained Enhanced DBS disclosures for all staff working frequently or intensively on the School site. Contracted staff must show ID when they first arrive on site.

Tonbridge School will endeavour to fill short term staff absences through internal cover and re-deployment of existing staff. However, there are occasions where it becomes necessary to utilise the services of a supply agency to support our recruitment needs. In these situations, the following guidelines apply (and are conditions of the contract drawn up with the supply agency):

- The supply agency MUST provide written notification that all appropriate safeguarding checks have been made before a supplied person can commence work at Tonbridge School;
- The School MUST receive a copy of the DBS disclosure before a supplied person can commence work;
- The DBS disclosure must have been made not more than 3 months prior to the commencement of employment at School;
- The person offered for supply must satisfy the identity checks that all employees of the School are subject to (irrespective of any previous identity check);
- For any supply staff working in a boarding context the School will require (independently of the supply agency) an Enhanced DBS Disclosure with barred list check.

In addition, Tonbridge School does all it can to ensure that staff employed by other organisations, but working with our boys, are appropriately vetted.

Further details on the School's recruitment processes, including recruitment checks undertaken, can be found in the Staff Recruitment policy

5. CODE OF CONDUCT / STAFF RESPONSIBILITIES

All colleagues are made aware of their roles and responsibilities with regard to issues such as duty of care, position of trust, behaviour, one-to-one situations use of physical restraint and awareness of School policies at induction and through the provision of a Staff Handbook and a Pastoral and Tutor Handbook. This advice is based on the Guidance for Safe Working Practice for Adults who work with Children and Young People. There is also a clear and published Code of Conduct for all staff which outlines these roles and responsibilities and to which all staff are expected to adhere.

Staff should not behave in a manner which would lead any reasonable person to question their suitability to work with children (this might involve misuse of drugs, alcohol or acts of violence or inappropriate use of social media). In addition, staff must be even-handed, consistent and unambiguous in the way they treat boys, avoiding any actions that would be considered 'unprofessional'. For instance, the verbal slighting in public of a boy (or indeed another member of staff), whether intended or unintended, would be regarded as unprofessional.

Staff should not have current boys as their 'friends' on social networking sites.

Fuller guidance and advice is available to staff in the Tonbridge School Handbook and in the Code of Conduct.

6. BOY WHO HAS (OR SEEMS TO HAVE) GONE MISSING

The supervision and monitoring of boys during the School day is outlined in the Attendance and Pupil Supervision policies and is the responsibility of all staff.

For a day boy who is absent from School at the morning or afternoon registration session, the Housemaster should contact the parents in the first instance to establish the whereabouts of the student.

Any unauthorised absence from a lesson must be reported to the Housemaster as soon as possible.

For a boy actually to 'go missing' is a very rare occurrence indeed and in these situations the Housemaster's first responsibility to the parents is to safeguard and promote the welfare of their sons. This is, therefore, a critical issue. Housemasters have to consider the options and their response will be a matter of judgment. The most worrying time is late evening or if the boy has disappeared overnight and is not in breakfast. Given the rarity of such an event and the potential for significant harm to occur to a student who has gone missing it is expected that a Housemaster will deal with any uncharacteristic or unexplained absence as a priority, likely involving discussion with Headmaster or Second Master.

Step One: informal checks and contact

The mobile numbers of the boys are held on the School database to which all staff have access. In the first instance, the Housemaster should attempt to contact the missing boy on his mobile 'phone.

Usually the other boys know where he is. The degree of concern will vary a little with the age of the boy and the time elapsed from when he was last seen.

Step Two: When the Housemaster, after all informal checks, believes that a boy has gone missing, the following must happen **immediately**:

- The Second Master and the Headmaster must be informed.
- The boy's parents must be notified, and his house checked.
- The boy should be listed as a 'missing person' with the police.

It is important that at each stage the Housemaster records the actions and decisions taken, so that a formal written record of the episode is kept. Full details of the procedures are in the separate policy.

7. COMPLAINTS AND WHISTLEBLOWING

Tonbridge School recognises that it is possible for staff and volunteers to behave in a manner that causes harm to children, and takes any allegation made against members of staff or volunteers seriously. All staff receive induction and ongoing reminders about the School's Whistleblowing policy and procedures: when staff have concerns about the conduct of a colleague, the School's Whistleblowing Policy enables them to raise concerns in confidence and for a sensitive enquiry to take place.

Allegations of abuse concerning staff, volunteers or the DSL should be reported to the Headmaster. If he is absent, the allegation should be passed to the Chair of Governors. If the allegation concerns the Headmaster, the person receiving the allegation should immediately inform the Chair of Governors without notifying the Headmaster first. In case of serious harm, the police should be informed from the outset.

Where a parent or boy raises a concern about poor practice, the published complaints procedure is available, either through the Parents' Handbook or on the School website.

The NSPCC runs a whistleblowing national portal for child abuse related reports, commissioned by the Home Office. Contact details can be found in Section 3. of this policy.

Full versions of the Whistleblowing Policy and the Complaints Policy are available on the School's website.

8. ANTI-BULLYING and CYBERBULLYING

Tonbridge School supports the right of all members of the School community to be free from all forms of bullying, harassment and discrimination. We wish to create and maintain a caring and supportive School environment by making clear that bullying will not be tolerated and that positive steps will be taken to eradicate it. We aim to create an atmosphere in which staff, parents and boys are encouraged to bring out into the open any incident of bullying, knowing that measures to deal with it will have the support of the whole School community. Our Anti-Bullying Policy is based in large part on the views of the boys themselves, who are encouraged to feel that they are the owners of it. It represents the School's promise to address problems of bullying and do all that it can to prevent them.

9. ONLINE-SAFETY POLICY, and the CYBERBULLYING and ACCEPTABLE USE of COMPUTERS POLICIES

Our Online-Safety Policy builds on the KCC e-Safety Policy and government guidance and is applied in conjunction with the Cyberbullying and Acceptable Use of Computers Policies. The aims of the Online-Safety Policy are:

- To promote the welfare and safeguarding of boys and staff at Tonbridge School.
- To ensure that boys are ICT literate and can use the facilities to ensure that their educational provision is enhanced to the maximum.
- To promote responsible and effective use of electronic communication (including the use of the internet and mobile phone technology).
- To educate boys and staff about the risks and responsibilities involved in the use of new technology, particularly with regard to the potential moral and criminal consequences of their actions.

- To raise awareness of and counter instances of cyber bullying. This includes bullying via text message, via instant-messenger services, apps and social network sites, via email, and via images or videos posted on the internet or spread via mobile phone. It can take the form of a type of bullying, i.e. technology can be used to bully for reasons of race, religion, sexuality, disability, etc.

The Second Master is the Online Safety Officer. The School has robust filtering, monitoring and flagging systems in place to protect boys from accessing inappropriate material online. The School can confiscate and search any boy's device if there is concern about his online behaviour.

10. TAKING, STORING AND USING IMAGES OF BOYS

Tonbridge School recognises that every member of the School community has a right to privacy under both human rights and data protection legislation and that this right must be respected in all activities. School policy is that consent for all such photography is granted via the contract between the parent and the School, and in staff contracts of employment, but that any boy, parent or member of staff is entitled to withdraw such consent either generally or for any specific occasion or purpose by written instruction to the Second Master, or for members of the support staff, to the Bursar. In all such cases the School will respect the wishes and the image rights of the individual.

This policy will be subject to certain safeguards as set out below:

- a) Where general or specific consent is withheld by a boy or parent, the Second Master will ensure that all staff are informed, and the School will make every effort to comply sensitively with the request.
- b) Any images of boys which are used by the School must conform to appropriate standards of integrity and decency and must avoid any possibility of embarrassment to the subject of the photograph.
- c) Boys must not take any images of each other or other members of the School community which would be regarded as inappropriate. Electronic or mobile phone transmission of such images without consent is a School disciplinary offence (see policies on computer and mobile phone use).
- d) School management will ensure that appropriate controls are imposed on images recorded on CCTV. Such images will be retained securely and only viewed by designated members of staff responsible for School security.
- e) It is a disciplinary offence for any a boy or member of staff to publish or transmit any image which brings the School into disrepute.

11. HEALTH & SAFETY

Tonbridge School fully recognises its responsibility to minimise potential risks for all those who use the site and for those engaged in School activity off site. The School organises its Health and Safety affairs in accordance with the principles and guidance set out in HSG 65 "Successful Health & Safety Management" published by the Health and Safety Executive. The School's Governors and Senior Management also follow the guidance contained in INDG417 "Leading Health and Safety at Work", and aim to follow the three principles underlying this guidance:

- Strong and active leadership from the top: ensuring visible and active commitment from the board, establishing effective "downward" communication systems and management structures, and integrating good Health and Safety management with business decisions.
- Staff involvement: engaging all staff in the promotion and achievement of safe and healthy conditions, enabling effective "upward" communication, and providing high quality training.
- Assessment and review: identifying and managing health and safety risks, accessing (and following) competent advice, and monitoring, reporting and reviewing performance.

In addition, School policy has regard to 'Health and Safety: Advice on Legal Duties and Powers for Local Authorities, Head Teachers, Staff and Governing Bodies.'

In addition to the policies outlined above, Tonbridge School encourages an environment where boys feel secure, are encouraged to talk, and are listened to, and where the experiences of boys are regularly monitored. The boys are taught about safeguarding and we aim to ensure that they can recognise when they are at risk and how to get help when they need it. We aim to achieve this through the measures listed below:

A. BEHAVIOUR, REWARDS AND SANCTIONS POLICY

Tonbridge School Behaviour, Rewards and Sanctions Policy is designed to ensure an acceptable standard of behaviour in and around School and on any School activity. It is based on clear values which the School promotes; these include self-discipline, a sense of responsibility, a proper regard for authority, respect for and celebration of difference in others, and a sense of service to the community. It places emphasis on the positive behaviour to be expected and rewarded, as well as prevention of what is unacceptable. At its heart is the promotion of a good learning and teaching atmosphere in which all boys can realise their potential. The policy safeguards and promotes the welfare of all boys, protecting them from all kinds of discrimination and harassment. It recognises the duty of the School to promote race equality and to act to tackle inequalities and discrimination of any kind that are identified. It relies on a culture of mutual respect between parents, boys and staff, and it has been drawn up in wide consultation with the School community. It will be subject to regular review by the Second Master in consultation with others. The Behaviour, Rewards and Sanctions Policy has four main elements:

- ‘Expected Behaviour at Tonbridge School’ – a code to be promoted, taught and enforced.
- A System of Rewards for Achievement, Effort and Good Behaviour.
- A System of Sanctions.
- A Statement of Roles and Responsibilities.

It is important that this policy should be read and applied in conjunction with other School policies and programmes, published separately in the Tonbridge School Handbook and Parents’ Handbook.

B. STUDENT VOICE

Boys are encouraged to voice their opinions through regular meetings of School and House councils, through the use of questionnaires by the Upper and Lower Masters, through regular meetings with their tutors and through the use of the termly monitoring visits of Houses by the Second Master and the Upper Master.

C. REGULAR PASTORAL TEAM MEETINGS

Each Housemaster manages a team of individuals with responsibilities in the House (including tutors and matrons). These Teams meet regularly throughout the term to share information about the boys in their care. Minutes are forwarded to the Upper Master and the Second Master who scrutinise them.

D. THE WELFARE GROUP

This group includes the Second Master, who chairs the group, the School Counsellor, the Sister-in-Charge of the Medical Centre and the Upper Master. The group invites Housemasters, Matrons and other pastoral staff to raise concerns about boys and looks at ways in which boys who have welfare needs can be supported both internally and by external agencies (e.g. CAMHS). Discussions are confidential to the group. The Headmaster is regularly informed of these discussions and any significant concern or active advice for Housemasters and Matrons is shared. Active monitoring and review by

Housemasters of boys with welfare needs is informed by the discussions of the Welfare Group. Ongoing review might include a welfare plan which highlights concerns and strategies and is a useful action plan to monitor and support boys with welfare needs.

E. GOVERNORS' VISITS

Members of the Governors' Pastoral Committee regularly visit the Boarding and Day Houses to have lunch with the boys, talk to the Matron and to the Housemaster. Senior Student Houses are visited once every two years. A report of each visit is given to the full Pastoral Committee where any issues are discussed and addressed.

F. TERMLY MONITORING VISITS

The Second Master and the Upper Master formally review each House every term and talk to boys about their experiences in the Houses. There are also plenty of opportunities to talk to the boys informally during lunch in the Houses. Senior Student Houses are visited once a year.

G. PSHEE

Tonbridge School aims to provide a caring and enlightened environment in which the talents of each individual flourish. We encourage boys to be creative, tolerant and to strive for academic, sporting and cultural excellence. Respect for tradition and openness to innovation are equally valued. A well-established house system at the heart of the School fosters a strong sense of belonging. Tonbridge seeks to celebrate its distinctive mixture of boarders and day boys; this helps to create a unique broadening and deepening of opportunity and experience. Ensuring an effective PSHEE programme is in place helps educate the boys about safeguarding issues, promotes a healthy, fulfilled and responsible lifestyle, and strengthens emotional intelligence.

H. THE PREVENT DUTY AT TONBRIDGE SCHOOL

Tonbridge School is committed to providing a secure environment where boys feel safe and are kept safe. All adults in our School recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for boys or not.

There is no place for extremist views of any kind at Tonbridge whether from internal sources – boys, staff or Governors, or external sources – the wider School community, external agencies or individuals. Boys at Tonbridge see our School as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this; we have a duty to ensure this happens. We therefore will provide a broad and balanced curriculum, delivered by skilled professionals, so that our boys are enriched, understand and become tolerant of difference and diversity and are in an environment where they thrive, feel valued and are not marginalised.

Annex 1: Job Description for the Designated Safeguarding Lead (DSL)

Tonbridge School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The School will provide opportunities for regular external review of the role of the Designated Safeguarding Lead (DSL).

The DSL is the Second Master, Dr P Huw Williams. In his absence, one of the Deputy Designated Safeguarding Leads will carry out these duties and this Job Description applies to them in those circumstances.

<p>Summary of the role</p>	<p>The DSL:</p> <ul style="list-style-type: none"> • will take lead responsibility for all child protection matters arising at the School and will support all other members of staff in relation to any safeguarding or child protection concerns that arise • will undergo appropriate and regular training in order to fulfil his duties • has the status and authority within the School to carry out the duties of the post including committing resources, arranging training, supporting and directing other staff to safeguard and promote the welfare of children • is responsible for maintaining an overview of safeguarding within the school, to maintain open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in place • is also the Online-Safety Officer and has responsibility for policies surrounding Online-Safety • is responsible for receiving and reviewing child protection files from the Schools of boys arriving at Tonbridge, and for liaising with the DSL from those Schools, when appropriate, for the best care and the smooth transition of a boy to Tonbridge • is responsible for keeping detailed, accurate, secure records of concerns, allegations and referrals for any Child Protection issues. • will communicate regularly with the Governor responsible for Child Protection (Mr Andrew Mayer) and will discuss with him any cases of concern. They will meet annually for a formal review of Safeguarding. • will attend the Governors' Pastoral Committee to discuss Safeguarding practice in the School • will keep the Headmaster informed of all concerns and allegations relating to Safeguarding and Child Protection
<p>Main duties and responsibilities</p>	<p>Managing referrals</p> <ul style="list-style-type: none"> • To take lead responsibility for referring all cases of suspected abuse of any a boy at the School to Kent Social Services • To refer all cases of suspected abuse or risk of significant harm promptly to the local authority children's social care • To take lead responsibility for referring to the Local Authority Designated Officer (LADO) team all child protection concerns which involve a member of staff • To liaise with the Headmaster, Bursar and Personnel Manager to ensure that where a member of staff is dismissed or resigns in circumstances where there has been actual harm or risk of harm to a child, referrals are made to

	<p>the Disclosure and Barring Service or where appropriate, to the National College for Teaching and Leadership (NCTL)</p> <ul style="list-style-type: none"> • To liaise with the Headmaster for making prompt referrals to the police where a crime may have been committed which involves a child • To liaise with the Headmaster in respect of police investigations or investigations under section 47 Children Act 1989 which involve the School • To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when to make a referral by liaising with the relevant agencies <p>Raising awareness</p> <ul style="list-style-type: none"> • To ensure the School's Safeguarding and Child Protection Policy, and its implementation, is reviewed at least annually, taking into account available and up to date legislation, guidance and best practice, and to liaise with the Headmaster, Governors and staff to ensure the policy is applicable to and understood by all Staff at Tonbridge School • To ensure the Safeguarding and Child Protection Policy is available publicly and is published on the School Website • To maintain links with the Kent Safeguarding Children Board (KSCB) to ensure staff are aware of training opportunities and the local policies on safeguarding • To ensure that staff and boys are aware of the policies and procedures in place if they have a concern
<p>Line management duties and responsibilities</p>	<p>The DSL will:</p> <ul style="list-style-type: none"> • line-manage the Deputy Designated Safeguarding Leads (The Upper Master, Mr John Bleakley, the Lower Master, Miss Josie Green and the Manager of the Tonbridge School Centre, Mr Alex Lloyd) • work with the Bursar and the Personnel Manager to ensure appropriate vetting and checks are made and recorded for new staff • support Housemasters, Matrons and other Pastoral staff who have responsibility for any boy for whom there are Safeguarding or Child Protection Concerns • line-manage the School Counsellor and the Sister-in-Charge of the Medical Centre • chair the Welfare Group, which reviews all boys of concern
<p>Training and Induction of Staff</p>	<p>The DSL will:</p> <ul style="list-style-type: none"> • liaise with the Personnel Manager and the Director of Teaching and Learning to ensure that all new Staff and Governors receive appropriate induction in relation to the School's Safeguarding and Child Protection policy and practice, including other key Safeguarding policies such as those relating to Whistleblowing and the Staff Code of Conduct. • will arrange whole School staff training in Child Protection on a regular basis – at least every three years • will be responsible for providing Staff and Governors with regular updates on Safeguarding and Child Protection as appropriate • liaise with the Personnel Manager to maintain a record of staff training

	<ul style="list-style-type: none"> • work with the Lower Master, the Director of ICTS and the Head of Digital Creativity to oversee training and information provided for Staff, parents and boys relating to Online Safety
<p>The DSL's training</p>	<p>The DSL will receive appropriate Child Protection training at least every two years, although in practice he will complete the Kent County Council DSL refresher training annually as well as attending other relevant conferences, courses and seminars to ensure he remains up to date, in order to:</p> <ul style="list-style-type: none"> • 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; • Have a working knowledge of how the local authority conducts 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; • Be alert to the specific needs of children in need, those with Special Educational Needs or Disabilities and young carers; • Remain up to date on best practice and changes to legislation and guidance, and to understand emerging areas of focus for Child Protection; • 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; • Develop and review the School's policy and practice in relation to Safeguarding and Child Protection.