



DEAN CLOSE SCHOOLS

The Dean Close Foundation Schools

Independent, Co-educational, Day and Boarding Schools

Safeguarding and Child Protection Policy (W044)

**Ratified by the Trustee Board 12th June 2021
Updated 1st September 2021**

Registered Charity No: 1086829

Introduction

1. **This Policy is in accordance with locally agreed Inter-Agency procedures.**
2. A range of documents, circulars and guidance for good practice govern Safeguarding and Child Protection work at Dean Close Foundation schools. Key documents, which inform this policy include:
 - a. *Keeping Children Safe in Education 2021*
 - b. *Working Together to Safeguard Children 2018*
 - c. *Working Together: Gloucestershire's multi-agency arrangements to safeguard children (2020)*
 - d. *What to do if you're worried a child is being abused guidance (2015)*
 - e. *Boarding Schools National Minimum Standards, standard 8*
 - f. *Every Child Matters agenda*
 - g. *The Children Act 2004*
 - h. *Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings. Mach 2009*
 - i. *Prevent Duty Guidance Section 29 of Counter-Terrorism and Security Act 2015*
 - j. *The Prevent Duty. Department for Education June 2015*
 - k. *Mandatory Reporting of Female Genital Mutilation. Home Office October 2015*
 - l. *Child sexual exploitation DfE February 2017*
 - m. *Teaching online safely in school DfE June 2019*
 - n. *Information sharing DfE July 2018*
3. Each school has its own Designated Safeguarding Lead (DSL) who is a member of the Senior Leadership Team of that school and at least one deputy DSL; these are listed below. In the absence of the DSL, the matter should be referred to a Deputy DSL or the DSL in another Foundation school. The DCS DSL is the safeguarding lead for all Foundation schools.

4. **Contact details:**

The DSL at Dean Close School is:

Jacqueline Davis (Deputy Head Pastoral)

07786 917259 or 01242 258019

jadavis@deanclose.org.uk

The Deputising DSL is:

Charlie Montgomery (Housemistress of Mead / Director of Tutoring)

01242 258000

chsmontgomery@deanclose.org.uk

Kate Milne (Housemistress of Hatherley)

07739 026163

kemilne@deanclose.org.uk

Deputy DSL (Administration)
Rosie Richards (PA to SLT)
01242 258000
rerichards@deanclose.org.uk

The DSL at Dean Close St John's School is:
Lisa Duncan (member of SLT)
07471 350717 or 01291 622045
duncanl@stjohnsonthehill.co.uk

The Deputy DSL is
Nick Thrower (Headmaster)
07471 350706
throwern@stjohnsonthehill.co.uk

The DSL at Dean Close Preparatory School is:
Emma Bailey (member of SLT)
07884 667302 or 01242 258000
ecbailey@deanclose.org.uk

The Deputy DSL is:
Alice Gould (Boarding co-ordinator)
01242 258030 or 07825 373733
agould@deanclose.org.uk

The DSL at Dean Close Pre-Preparatory School is:
Carolyn Shelley (Headmistress)
07867 392292 or 01242 258079
DCPPSHeadmistress@deanclose.org.uk

The Deputy DSL is:
Anna Moorhouse (EYFS Coordinator)
01242 258079
avmoorhouse@deanclose.org.uk

The DSL at Airthrie School is:
Matthew Medhurst
07471 350706 or 01242 512837
jason.dobbie@airthrie-school.co.uk

The Deputy DSL is:
Amy Whittaker
amy.whittaker@airthrie-school.co.uk

The Deputy DSL (EYFS) at Airthrie School is:
Kirsten Cuffe (Head of EYFS)
kirsten.cuffe@airthrie-school.co.uk

5. Other useful contact details

Gloucestershire Social Care:
Multi Agency Safeguarding Hub (MASH): 01452 426565 Option 3
(Monday – Friday 8am – 5pm) childrenshelpdesk@gloucestershire.gov.uk

Professionals need to make referrals to the MASH for Children's Services by completing a MARF on the Liquid Logic Portal

Emergency Social Care duty team: 01452 614194

Newport Children and Family Services: 01633 656656
After 5pm, on weekends or bank holidays contact: South East Wales Emergency Duty Team: 0800 3284432

Local Authority Designated Officer (LADO) 01452 426994

nigel.hatton@gloucestershire.gov.uk or jenny.kadodia@gloucestershire.gov.uk

Ofsted	08456 404040
Police Control Room	101
Disclosure and Barring Service (DBS)	01325 953795.

6. The Dean Close Foundation is subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions to have 'due regard to the need to prevent young people from being drawn into terrorism'. This is known as the prevent duty.
7. Any concerns about radicalisation or terrorism should be either reported to the police by phoning 101 or by calling the confidential Anti-Terrorism Hotline on 0800 789321. The Department of Education's counter extremism helpline can also be contacted on 020 7340 7264 (office hours) or counter.extremism@education.gsi.gov.uk .
8. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where FGM appears to have been carried out on a girl under the age of 18.
9. Concerns about Female Genital Mutilation (FGM) should be reported to the police who will request specific details as outlined in the Home Office guidance. If the girl is at immediate risk 999 should be called.
10. **Trustees:** Each School within Dean Close has a designated member of the Board of Trustees with particular responsibility for Child Protection matters; they are currently Mrs Sara Hirst (DCS, DCSJH and Foundation), Mr Stephen Drew (DCPS), Mr Simon Bullingham (DCSA) and Mrs Audrey Marsden (DCPPS).

Trustees may be contacted through the Bursary 01242 258086 bursary@deanclose.org.uk

Childcare (disqualification) Regulations 2009

11. The Foundation carries out police and enhanced DBS checks for all those wishing to work at Dean Close Foundation schools in either an employed or a voluntary capacity to ensure that they are not prohibited from doing so by the Secretary of State. Prevent guidance is also followed.
12. In addition the Foundation is aware that there are wider disqualification criteria that need to be applied for members of staff who:
 - a. Work in early years provision (including teachers and support staff working in the classroom)
 - b. Work in later years provision for children under the age of eight including all before and after school activities
 - c. Are directly concerned in the management of pupils under the age of eight.

13. As good practice, the Foundation will ensure that all members of the Dean Close community that have regular contact with pupils under the age of eight, regardless of the section of the School they normally work in, will be assessed using the disqualification criteria.
14. In addition to inclusion on the Children's Barred List, the wider disqualification criteria include:
 - a. Being cautioned for or convicted of certain violent and sexual criminal activities against children and adults
 - b. Grounds relating to the care of children (including where an order is made in respect of a child under the person's care)
 - c. Having registration refused or cancelled in relation to childcare or children's homes or being disqualified from private fostering.
15. The Foundation will ensure that all employees, and potential members of staff shortlisted for vacancies included in the criteria above, will be asked to provide any relevant information about themselves or members of their household via the Staff Suitability Self Declaration Form (see appendix E).
16. Any information that might suggest that a person is disqualified from working with children will be passed to Ofsted as soon as practicably possible, but at the latest within 14 days of the Foundation being aware of the information.
17. If the Foundation becomes aware that a member of staff is disqualified, the implications will be explained and details of how to apply for a waiver from Ofsted may be provided. If there are any queries about whether a person should be disqualified or whether information should be passed to Ofsted; the LADO will be consulted as soon as practicably possible.
18. In EYFS registered settings within the Dean Close Foundation, Ofsted will be informed of all allegations against people living or working at the premises, or of any other abuse alleged to have taken place on the premises, as soon as practicably possible and within 14 days.
19. The above criteria also apply to supply and temporary staff working in a Foundation school.

Aims and objectives

20. The Dean Close Foundation fully recognises its responsibilities for Safeguarding and Child Protection and its moral and statutory responsibility to safeguard and promote the welfare, health and safety of all pupils, including boarders, those with SEND and those in EYFS. The Foundation is concerned to promote a positive, supportive and secure environment in keeping with its Christian ethos. Consequently, the overall aim of this policy is to safeguard and promote the welfare of the children in the care of the Foundation and recognise that all pupils are entitled to protection from abuse and neglect. It also recognises that all staff and pupils are entitled to a fair hearing in case of any allegation of abuse. The Foundation is committed to providing appropriate training and support to all staff in matters of pupil safeguarding including:
 - a. Training at least every two years for the DSL and Deputy DSL as well as encouraging relevant CPD
 - b. Training at least every three years for all other members of staff

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- c. Informal safeguarding updates are provided as required but at least annually for staff
- d. Compliance with all safer recruitment legislation and good practice
- e. Ensuring that all staff are given and read as a minimum Part One and Annex B of KCSIE and a signed record kept of who has (those in contact with older pupils should also read Part Five)
- f. Ensuring that all staff are given and have read this policy including the Staff Code of Conduct and a signed record is kept of who has
- g. Ensure that all staff are aware of online safety procedures for pupils and relevant e-safety policies
- h. Ensuring that all staff have read the pupil behaviour, anti-bullying and whistleblowing policies and have access to all other relevant policies
- i. Ensure that all staff are aware of and trained in the Prevent duty
- j. New staff induction includes safeguarding training including the identity of the DSL and any deputies
- k. Continuing to develop awareness in all staff of the need for Safeguarding and Child Protection and of their responsibility in identifying pupils who may be suffering abuse, and in identifying abuse, including signs of abuse and what to look for
- l. Ensuring that all staff are aware of referral procedures within the Foundation, feel able to raise concerns and feel supported in their Safeguarding role
- m. Ensure that staff are aware that some groups of pupils such as SEND and looked after children are more vulnerable to abuse
- n. Monitoring children who have been identified as 'at risk' or 'in need'
 - o. A child in need is defined as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled
 - o. A child a risk is defined as a child that is suffering or is likely to suffer, significant harm. This includes all forms of neglect and abuse (sexual, physical, emotional), Female Genital Mutilation or other so-called honour-based abuse, and extra-familial threats like radicalisation and sexual exploitation
- o. Ensuring that the Foundation recognises the importance of Inter-Agency work by maintaining contact with relevant local agencies
- p. Ensuring that the concepts of the 'Common Assessment Framework' and 'the Team around the Child' are embedded in all Foundation Safeguarding and Child Protection procedures
- q. Ensuring that all staff are aware of the possibility of peer-on-peer abuse which may include sexual violence and sexual harassment and may occur online
- r. Ensure that pupils and staff are aware of the safeguarding risks associated with remote learning and that adequate guidance is in place
- s. Ensuring that key concepts of Safeguarding and Child Protection are integrated into the curriculum across the Foundation at an age appropriate level
- t. Creating an environment where pupils feel secure, have their viewpoints valued, are encouraged to talk and are listened to
- u. To ensure that all Foundation pupils are safeguarded at all times whether on or off Foundation premises. This will ensure that any staff in contact with pupils from other organisations have been subject to suitable checks and assurances that safeguarding

- procedures are followed will be obtained from the organisation. Where practicably possible, Foundation staff will accompany pupils whilst in the care of outside organisations
- v. Ensuring that all pupils know of at least one adult that they can approach if they are worried or in difficulty
 - w. Ensuring that pupils know how to stay safe, including online
 - x. Ensuring that outside agencies are involved where appropriate
 - y. Ensuring that all staff are aware of how to refer to Social Care via the Gloucestershire Multi Agency Safeguarding Hub (MASH)
 - z. Keeping an open mind about the possibility of a Safeguarding or Child Protection issue arising
 - aa. Ensuring that staff always act in the interests of the child
 - bb. Ensuring all staff participate fully in the provision of Early Help as required
 - cc. Ensuring that staff are aware of the procedures if a child is missing from education.

21. Terminology

- a. **Safeguarding and promoting the welfare of children** refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully
- b. **Child protection** refers to the processes undertaken to protect children who have been identified as suffering or being 'at risk' or 'in need'
- c. **The Foundation** refers to Dean Close School, Dean Close Preparatory School and Dean Close Pre-Preparatory School, Dean Close St. John's and Airthrie School. It includes all policies, procedures and personnel attached to the five schools
- d. **Staff** refers to all those working for or on behalf of the Foundation: including full-time, part-time and regular visiting staff, in either a paid or voluntary capacity. This includes Trustees
- e. **Children/Pupils** refers to all young people who have not yet reached their 18th birthday, and all pupils on the roll of a Foundation school including those over 18
- f. **Foundation Lead for Safeguarding** refers to the person responsible for coordinating Safeguarding policy and practice throughout the Foundation schools
- g. **Headmaster or Headmistress** refers to the head teacher of the appropriate school in the Foundation
- h. **Warden** refers to the CEO of the Dean Close Foundation
- i. **SEND** refers to pupils with special educational needs and disabilities
- j. **Early Help** means taking action to support a child, young person or their family as soon as the need emerges rather than waiting for it to escalate.

Roles and responsibilities

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22. Responsibilities of the Board of Trustees

The Board of Trustees will ensure that:

- a. The Safeguarding and Child Protection policy is reviewed and approved annually in June and ratified by the Chair of Trustees
- b. Other Safeguarding policies (such as Safer Recruitment, Staff Code of Conduct and Anti-Bullying) are in place and reviewed regularly
- c. Safeguarding and Child Protection is included as an agenda item at every Board of Trustees meeting. Minutes of Trustee meetings are kept
- d. There are effective Safeguarding, Staff Code of Conduct and Safer Recruitment policies and procedures in place
- e. A Trustee with specific responsibility for Safeguarding and Child Protection is appointed for each school within the Foundation
- f. Ensure that an annual safeguarding review is presented to the trustee body
- g. A DSL is appointed from the Senior Leadership Team (SLT) of each school within the Foundation and that there is a Deputy DSL in each school and that they all receive training every two years
- h. The Trustees with particular responsibility for Safeguarding and Child Protection meet with the appropriate DSL at least termly, and will report to the Trustee Board and raise any Safeguarding or Child Protection concerns or issues. The designated Trustees will receive training every three years
- i. All other staff are trained regularly in accordance with advice from GSCE, at least every three years
- j. Pupils have opportunities to learn about safeguarding as part of the curriculum at an age appropriate level
- k. The 'voice of the child' is heard and that the Foundation has an 'it can happen here' attitude
- l. All Trustees comply with their duties under legislation
- m. Procedures are in place to handle allegations against members of staff and that any such allegations are referred to the LADO and DBS as necessary
- n. The appropriate authority, time, funding, training, resources and support is given to the DSLs to take part in Safeguarding and Child Protection procedures including strategy discussions and inter-agency meetings
- o. The Foundation schools have an appropriate Child Missing from Education policy in place.

23. The role of the Chair of Trustees

- a. To inform and liaise with relevant external agencies if there is an allegation against a Headmaster or Headmistress or Warden
- b. To ensure that the designated Safeguarding and Child Protection Trustees are appointed and meet with the appropriate DSL
- c. To read and ratify the Safeguarding and Child Protection policy annually and following any significant revisions.

24. The role of the Head of each school

- a. To ensure that the Board of Trustees' ratified Safeguarding and Child Protection policy is followed by all staff
- b. To appoint and support a DSL and Deputy DSL in each school. (in the case of Airthrie School: to act as the DSL)
- c. To ensure that appropriate checks are carried out for all persons over 16 (not on the roll of the school) who live on the same premises as boarders but are not employed by the school, an

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enhanced certificate with a barred list information will be obtained from the Disclosure and Barring Service (DBS)

- d. To ensure that there is a written agreement between the school and any person over 16 not employed by the school but living in the same premises as children. This specifies the terms of their accommodation, guidance on contact with pupils, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with pupils. They are required to notify a member of SLT or the Bursar if they are charged with, or convicted of, any offence.

25. The role of the Warden (CEO)

- a. To ensure that the Headmaster or Headmistress in each school monitors the DSL and deputy DSL and that the correct safeguarding procedures are known and understood (in the case of Airthrie School: That the Head appropriately undertakes the role of DSL)
- b. To ensure that the Human Resources department carries out appropriate checks on all staff and that a single central record of identity, qualification and DBS checks is kept
- c. To keep the Board of Trustees informed of changing safeguarding requirements. This duty will normally be designated to the relevant DSL
- d. To monitor the progress of any major safeguarding concerns or investigation of Foundation procedures by an outside agency
- e. To meet regularly with the Foundation DSL with particular reference to strategy and Foundation issues.

26. The role of the Designated Safeguarding Lead (DSL)

See job description in appendix A.

The Policy

27. This policy applies to all staff, trustees, supply or temporary staff and volunteers working within the Foundation schools and all pupils including boarders, pupils with SEND, EAL and those in Early Years Foundation Stage (EYFS). The Foundation is fully committed to ensuring that the application of this Safeguarding and Child Protection policy is non-discriminatory in line with the UK Equality Act 2010.

28. The main elements of the policy are:

- a. That it fulfils the requirements of the Department for Education (DfE) child protection guidance as stated in Keeping Children Safe in Education (KCSIE) (September 2021)
- b. That it follows guidelines provided by the GSCE
- c. That it ensures the Foundation operates the suitability checks required by the DBS and those of the Independent School Standards Regulations when checking the suitability of staff to work with pupils
- d. That assurances have been received that employees of other organisations supervising Foundation pupils when in or away from Foundation schools have undergone the necessary checks
- e. It raises awareness of Safeguarding and Child Protection issues throughout the Foundation and ensures that pupils are equipped with the appropriate skills needed to keep them safe both in person and online

- f. That it develops and implements procedures for identifying and reporting cases, or suspected cases, of abuse
 - g. That it supports pupils who have been abused in accordance with an agreed 'Child in Need', 'Child at Risk' or Child Health and Education Plans
 - h. That it recognises and supports vulnerable pupils such as those with SEND or difficult family circumstances
 - i. That it offers a coordinated approach to Early Help.
29. This policy will be made available on the website of each school and copies will be provided to parents on request. In addition it will also be made available to all staff in the Foundation, and to older pupils occupying positions of responsibility.
30. This policy is renewed annually by the Foundation's Lead for Safeguarding in conjunction with DSLs and the designated Trustees to ensure that it reflects current legislation and local GSCE procedures.

In-school Procedures

31. All new staff will receive induction which will include familiarisation with safeguarding procedures and the identity of the DSL and any deputies.
32. All staff receive regular safeguarding training from the DSL, GSCE or other outside agencies. This includes:
- a. Identification of safeguarding issues
 - b. Procedures to be followed as outlined in this policy
 - c. Other aspects of the policy such as the Staff Code of Conduct
 - d. A consideration of other relevant school policies mentioned in this document such as the Peer-on-Peer Abuse, Anti-Bullying, Behaviour and Whistleblowing policies
 - e. An awareness of other organisations and documents that can be consulted
 - f. An awareness of statutory duties such as the reporting of FGM (in person) and Radicalisation as required by the Prevent duty (via the DSL) to the relevant authorities
 - g. Identity of the DSL and deputy DSL and contact details. Assurance that the DSL (or deputy) is available at all times during term time. In the very unusual case that the DSL and deputy for a school is not available, the DSL from another school in the Foundation should be contacted
 - h. Awareness of vulnerable groups, how Early Help is offered and the possibility of Peer-on-Peer abuse.
 - i. Consideration of scenarios relevant to each school.
33. All staff are able to identify the DSL and deputy DSL to whom they have ready and confidential access.
34. All staff are required to sign on an annual basis to say that they have read:
- a. KCSIE Part One and Annex B. The DSL will inform staff of any changes that occur during the course of the year (those in contact with older pupils should also read Part Five)
 - b. The Foundation Safeguarding and Child Protection Policy (W044)
 - c. The Foundation Anti-bullying policy (W045)
 - d. The individual school Behaviour Policy
 - e. The Foundation Whistleblowing Policy (W035)

And have:

- f. Successfully completed Child Protection and Safeguarding training in the last three years
- g. Successfully completed Prevent training.

35. Staff will receive regular safeguarding updates as required but at least annually.
36. The Foundation uses age appropriate filters on all IT systems within the schools to restrict access to illegal and inappropriate sites as well as monitor internet usage and sites accessed. Any attempt to access extremist or terrorist sites, extreme or violent pornography or illegal sites is blocked and reported.
37. The Visitors and Visiting Speakers Policy (W034) outlines the procedures that should be followed when inviting a person to speak to pupils. A member of staff should be present whilst the speaker is in contact with pupils to monitor content for safeguarding or counter-terrorism concerns.
38. The Dean Close Foundation recognises that both the mental and physical health of a pupil are relevant to safeguarding and the welfare of children.

Safeguarding concerns

39. Any child may be the subject of abuse or may be in need of early help intervention but all staff should be alert to the potential need for intervention for a child who:
- a. Is disabled and has specific additional needs
 - b. Has special educational needs (SEND or EAL)
 - c. Is a young carer
 - d. Is showing signs of being drawn into anti-social or criminal behaviour
 - e. Is frequently missing or goes missing from home
 - f. Is misusing drugs, alcohol or other substances
 - g. Has challenging family circumstances including substance abuse or mental health issues
 - h. Is at risk of being radicalised or exploited.
40. There will be occasions when a member of staff suspects that a pupil may have a significant welfare issue but there is no real evidence of a Safeguarding or Child Protection concern. Signs to be aware of include:
- a. Behavioural changes
 - b. Signs of confusion or distress in written or practical work
 - c. Physical changes
 - d. Bullying or suspicion of bullying.
41. In these circumstances the member of staff should give the pupil an opportunity to talk and discuss the observed signs. Low level concerns should always be taken seriously as they can develop into much more serious issues or may accumulate to reveal a safeguarding concern.
42. Particular notice should be given to vulnerable pupils and staff need to always be aware of the possibility of Peer-on-Peer abuse.

43. KCSIE makes it clear that anyone may make a referral to external agencies. However, it is normal Foundation practice to pass information to the DSL in the first instance.
44. Staff should not assume that someone else will take action so therefore should share information that might be critical in keeping a child safe promptly. This is everyone's responsibility.
45. If the pupil begins to reveal information of a Safeguarding or Child Protection nature, the procedures below should be followed. It is better to raise concerns which may not need action than to do nothing or delay reporting. Always act in the interests of the child and maintain an 'it can happen here' attitude.
46. DSL's operate an 'open door' policy for the reporting of safeguarding issues and child protection concerns. A DSL or deputy is always available either in person or on the phone in term time.
47. Staff need to be aware that pupil relationships can be abusive and may need to be investigated as a Safeguarding or Child Protection issue. A pupil may make an allegation of abuse against another pupil, in which case, the procedure below should be followed. (*See Anti-Bullying policy (W045) and Peer-on-Peer Abuse Policy (W055)*). These policies include:
- a. The different forms peer-on-peer abuse can take: sexual violence, sexual harassment, physical abuse, sharing of nude or semi-nude images, initiation/hazing type violence and rituals
 - b. An outline of procedures to minimise the risk of peer-on-peer abuse
 - c. How allegations of peer-on-peer abuse will be recorded and dealt with
 - d. A clear statement that abuse is abuse and should never be tolerated or passed as mere 'banter' or 'having a laugh'
 - e. Particularly in our schools which are co-educational, recognition of the gendered nature of peer-on-peer abuse but be clear that all peer-on-peer abuse is unacceptable and will be taken seriously
 - f. Clear processes for how victims, perpetrators and any other child affected will be supported.
- 48. Procedure for when a pupil makes a disclosure of abuse**
- a. Allow the pupil to speak freely and lead the discussion
 - b. Recognise the courage the pupil is showing by making the disclosure
 - c. Recognise that there is a relationship of trust between the pupil and yourself. The pupil has chosen to disclose to you and should not be told to speak to someone else
 - d. Make it clear at an early stage that confidentiality cannot be guaranteed
 - e. Remain calm and do not over react
 - f. Listen, be supportive and offer reassurance
 - g. Accept what the pupil is saying without challenge
 - h. Do not offer any admonishment or criticism of the pupil's actions or lack of action
 - i. Allow silences
 - j. Do not ask leading or investigative questions for example by asking for names or further details
 - k. Be cautious about any physical contact even if the pupil is very upset
 - l. Do not apportion blame or criticise others mentioned in the disclosure
 - m. If the information that has been disclosed needs to be passed on, explain to the pupil what will happen next
 - n. If the pupil appears to be 'at risk' or 'in need' the information must be passed on to the DSL (or Deputy DSL) as soon as practicably possible

- o. If the child is found to be 'in need' the case will be referred to Social Care without delay
- p. If the child is found to be 'at risk' Social Care will be contacted as soon as practicably possible (within 24 hours)
- q. If the disclosure is of a safeguarding nature, it should be discussed with the DSL without delay
- r. A written account of the conversation should be made as soon as possible. If a body map is used it must be completed with the pupil fully clothed. Under no circumstances should a member of staff ask a pupil to remove or adjust clothing. Only parts of the body normally visible should be viewed and recorded
- s. If the pupil is in danger of immediate harm, the Police should be contacted first
- t. It is not the responsibility of the school to investigate suspected cases of abuse prior to informing Social Care and/or the LADO
- u. Legal action against the perpetrator of abuse can be compromised by inappropriate actions by individuals or the school and by not following this guidance
- v. Parents are normally notified (by the DSL) as soon as practicably possible of any concern, suspicion or disclosure of a Safeguarding or Child Protection nature. However if it is believed that notifying parents could increase the risk to the child or exacerbate the situation, advice will first be sought from Social Care.

49. Procedure for when an allegation of child abuse is made against another pupil (to be carried out in conjunction with the Anti-bullying (W045) and Peer-on-Peer Abuse (W055) policies. The Youth Produced Sexual Imagery Policy (W051) may also be relevant)

- a. The disclosure should be listened to and recorded following the steps outlined above
- b. The Foundation's Anti-bullying policy, Peer-on-Peer Abuse Policy, Youth Produced Sexual Imagery policy and individual school behaviour policy should be considered when a pupil makes a disclosure involving another pupil
- c. Behaviour of an abusive or bullying nature should be managed following the School's Anti-bullying policy or Peer-on-Peer Abuse policy
- d. Behaviour which raises Safeguarding or Child Protection concerns should be referred to the DSL as soon as practicably possible
- e. Be aware that Child Criminal Exploitation (CCE) or Child Sexual Exploitation (CSE) may form part of the abuse
- f. If a disclosure or allegation of abuse is made by a pupil against another pupil, it will be referred to Social Care without delay
- g. Pupils who abuse others may well have been abused themselves so Child Protection procedures need to be followed for both victim and perpetrator
- h. Bullying or abuse of pupils by pupils can occur within the boarding community particularly in less structured times. Boarding staff are aware of the risk and monitor pupils, particularly those from vulnerable groups such as SEND or EAL for signs of bullying, being bullied or abuse. Tutors and other boarding staff play a pivotal role in the prevention and monitoring of situations likely to give rise to bullying or abuse
- i. Peer-on-peer abuse where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' is likely to be reported to social care and all pupils involved considered to be 'at risk'
- j. Prefects and older pupils with positions of responsibility will receive appropriate Safeguarding and Child Protection training including identification of signs of abuse and appropriate action to take if they become aware of any Safeguarding or Child Protection concern
- k. Pupils who make malicious allegations against another pupil or a member of staff will be dealt with in line with the School's Behaviour Policy
- l. If it is suspected that a crime has been committed, the police will be informed.

50. Procedure for when an allegation is made against a member of staff (including volunteers)

- a. Part 4 of KCSIE provides detailed guidance on these issues
- b. Allegations against staff, including the DSL and volunteers, must be reported without delay to the Headmaster or Headmistress or in his or her absence the Warden who will refer to the Chair of Trustees. The Head will inform the LADO
- c. The LADO should be informed without delay, of any allegation against a member of staff or volunteer that meets the criteria that the adult:
 - i. Behaved in a way that harmed a child, or may have harmed a child
 - ii. Possibly committed a criminal offence against or related to a child
 - iii. Behaved towards a child or children in a way that indicates that they would pose a risk of harm if they work regularly or closely with children
 - iv. Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- d. The LADO should be informed within one working day of all allegations that come to the Foundations' attention or that are made directly to the Police
- e. The LADO will advise on subsequent actions
- f. In borderline cases, informal discussions will be held with the LADO without names or personal details being disclosed
- g. The LADO is pivotal in providing advice when an allegation is made
- h. The LADO presides over any abuse allegation or suspicion of abuse directed against anyone working for the Foundation.
- i. Staff who are concerned about the conduct of a colleague towards a child must remember to act in the interests of the child despite any issues this may cause for the colleague or the Foundation
- j. The Foundation Whistleblowing policy enables all staff to raise concerns or allegations in confidence and without prejudice
- k. The Foundation will make every effort to maintain confidentiality and guard against unwanted publicity
- l. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretation of events can and do happen
- m. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. All unnecessary delays should be eradicated
- n. If an accusation is made against a member of boarding staff, or if a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements will be made for alternative accommodation away from pupils. This may be in a Foundation or rented property
- o. The Foundation will not undertake their own investigations without prior consultation with the LADO, or, in the most serious cases, the Police, so as not to jeopardise statutory investigations
- p. All discussions should be recorded in writing
- q. Communication with both the individual and the parents of the child should be timely and accurate
- r. Suspension of a member of staff is not mandatory or automatic and is done without prejudice to the outcome of any inquiry
- s. Possible suspension of the member of staff, against whom an allegation has been made, will be carefully considered after consultation with the LADO
- t. Resident members of staff who have been suspended pending investigation of an allegation will be accommodated off-site
- u. Malicious, unsubstantiated and unfounded allegations will be removed from staff personal records and will not be referred to in employer references

- v. Any person (whether employed, contracted, a volunteer or pupil) who has harmed or poses a risk of harm to a child and who has been removed from working with children, or would have been removed had they not left earlier, will be reported promptly to the Disclosure and Barring Service (DBS)
- w. A member of staff will be referred to the Teacher Regulation Agency (TRA) if they have been dismissed or would have been dismissed had they remained in employment, for misconduct and a prohibition order may be appropriate. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'
- x. If a member of staff has been employed as supply or short term staff via an agency, a report will be sent to the agency concerned.
- y. Allegations against a teacher who is no longer teaching should be notified to the Head, who will refer them to the police. Historical allegations of abuse should also be referred to the police.

51. Procedure for when an allegation is made against the Headmaster or Headmistress, Warden or Chair of Trustees

- a. Allegations against the Headmaster or Headmistress or Warden must be reported to the Chair of Trustees who reports it to the LADO within one working day
- b. The Headmaster or Headmistress or Warden will not be informed until advice has been sought from the LADO
- c. Allegations against the Chair of Trustees must be reported to the LADO within one working day.

52. The flow chart in appendix D helps guide colleagues in what to do if a disclosure is made.

53. In order to avoid misconceptions of behaviour, all staff should follow the advice given in the following Foundation documents all of which are available online:

- a. *Staff Code of Conduct (See appendix B)*
- b. *Staff Social Media Policy (W057)*
- c. *Anti-Bullying Policy (W045)*
- d. *School Behaviour Policies*
- e. *Complaints – Students and Parents Policy (W007)*
- f. *Recruitment Process Policy (W041)*
- g. *Youth Produced Sexual Imagery Policy (W051)*
- h. *Peer-on-Peer Abuse Policy (W055)*
- i. *Whistleblowing policy (W035)*
- j. *Confidentiality and Information Sharing Policy (W066).*

Confidentiality and information sharing

54. Safeguarding and Child Protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved, but also to ensure that evidence is not compromised by being released into the public domain.

55. Safeguarding issues should be discussed with the minimum number of people and usually only with the DSL in the first instance although other pastoral staff or member of SLT may be better placed to give initial advice for a lower level concern.
56. Safeguarding and Child Protection records should be carefully kept in a locked facility by the DSL with limited access. This can be a real or digital facility such as CPOMS. A pupil may be flagged on the School database or other pastoral software (such as CPOMS) as having Safeguarding or Child Protection information attached to them: in which case information should be sought from the relevant DSL as necessary.

Staff training and information

57. All staff and designated Trustees will be regularly trained in Child Protection and Safeguarding. Training will be provided at least every three years and a record will be kept. This training will be GSCE approved and may consist of completing an online module, training delivered by the DSL or training delivered by GSCE. This includes the Headmaster or Headmistress, Warden and Trustees.
58. The DSL and Deputy DSL will be trained at least every two years. The DSL is responsible for the organisation and standard of training. All staff and some volunteers will be given full safeguarding training. Other voluntary and visiting staff will be given the 'Child Protection at Dean Close' card, access to this policy and KCSIE part 1 and Annex B.
59. The Foundation's Staff Code of Conduct give detailed guidance on how all staff should conduct themselves in each section of the Foundation in order to avoid any misconceptions of behaviour or unfounded Safeguarding allegations (see appendix B). This includes appropriate use of mobile phones and other devices including cameras. Staff should only take photos of pupils for school use and not store them on personal devices, please see Staff Acceptable Use if IT policy (W056). Staff in EYFS and EYFS settings have separate guidance, please see DCPPS Mobile Phone and Camera Policy (PP312) and Airthrie School: Acceptable Use Policy and Staff Agreement May 2021.

Safer recruitment

60. All staff recruitment at a Foundation school is informed in particular by part 3 of KCSIE and 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'.
61. All interview processes involve a safer recruitment trained member of staff. The Chair of Trustees and the Lead Nominated Safeguarding Trustee receive safer recruitment training every five years.
62. A Single Central Record (SCR) of employment within the Foundation is compiled and updated by the Human Resources department in the Bursary.
63. All visitors on one of the Foundation sites including visiting speakers and volunteers are checked in accordance with safer recruitment requirements. The procedures outlined in Prevent are also followed.

Pupil education

64. Key elements of Safeguarding and Child Protection are incorporated into the curriculum at age appropriate levels. Issues such as appropriate relationships, bullying, e-safety, personal safety and mental health are primarily taught in PHSE lessons although they also form part of the Biology, RS and English schemes of work. All academic teachers are aware that issues of a Safeguarding or Child Protection nature may come to light in any lesson and are aware of the procedures to follow. Outside agencies are often invited to the School to discuss age appropriate issues relevant to Safeguarding and Child Protection.
65. The Pupil Behaviour policies and the acceptable use of ICT policies include guidance on the use of mobile phones and cameras at an appropriate level for each school. Pupils are encouraged to use their phones sensibly and report any concerns to a member of staff. The school reserves the right to search any mobile phone or other device for inappropriate messaging or photographs (please see Youth Produced Sexual Imagery Policy (W055)). Advice on the monitoring of 3G, 4G and 5G will also be given.
66. The PSHE programme of study will ensure that all pupils understand, at the appropriate level the dangers of extremism and radicalisation as outlined in Prevent. They will be encouraged to report any concerns.
67. The PSHE programme will ensure that pupils are aware of other types of abuse, as outlined in this document, at the appropriate level. They will be encouraged to report any concerns.
68. The tutorial or other pastoral programme is designed to include age appropriate discussion about relationships, consent, boundaries, appropriate communication and other issues of concern. Where age appropriate, notices are displayed around each school giving contact details for the school counsellor, the independent listener, helplines and other relevant agencies. Pupils are informed about the people they can talk to including older pupils, the pastoral staff, medical professionals and the Chaplaincy team. Heads of House and other senior pupils receive Safeguarding and Child Protection training as appropriate.
69. The Foundation schools have appropriate IT filtering system with age appropriate filters set in different sections of the schools. Illegal websites such as those promoting extremism, radicalisation, terrorism, extreme pornography and the sale of illegal substances cannot be accessed via the School Internet. Pupils receive guidance on accessing such sites through their own electronic devices.
70. Internet usage is monitored throughout the Foundation. Attempts to access banned or unsuitable sites is recorded and patterns of online behaviour observed.
71. Where remote teaching and learning is necessary, pupils and staff will be advised on the correct protocols and how to report issues of concern.

Signs of abuse

72. All Foundation staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that are easily defined. In most cases, multiple issues overlap.

73. Staff are aware that abuse can take place wholly online and that technology can be used to facilitate abuse face-to-face.
74. Part one of KCSIE defines abuse and gives details of the four broad categories of abuse.
75. **Abuse:** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by knowingly not preventing harm. Children may be abused in a family, the community, an institutional setting by someone known to them, or more rarely by a stranger. Abuse can take place wholly online, or technology may be used to facilitate face-to-face abuse. Most young people who are abused know their abuser. They may be abused by an adult or adults, child or children.
76. **Physical abuse:** This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
77. Children regularly collect bumps and bruises but it does not mean they are being abused. Injuries need to be considered in the light of the age of the child, their stage of development, where injuries are on the body and any explanation given.
78. Indicators of physical abuse include bruises, grip marks, cigarette burns, bite marks, swelling, fractures, injuries in an area of the body that is unlikely to be harmed in everyday activity, and injury with no explanation or conflicting explanation.
79. **Emotional abuse:** This is persistent emotional maltreatment, which is likely to cause serious harm to the child's health and emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It also includes rejecting or ignoring a child completely, using degrading language or behaviour towards them, rejecting social interaction with them, threatening them, encouraging self-destructive behaviours and allowing a child to witness mistreatment of another. It may involve serious bullying causing children to feel frightened or in danger. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
80. Indicators of emotional abuse can be difficult to identify but include developmental lags, acceptance of excessive punishment, over-reaction to mistakes, self-deprecation, fear of new situations, inappropriate emotional response, neurotic behaviour, self-harm or substance abuse. Children suffering emotional abuse may have difficulty forming relationships, seek attention inappropriately, be withdrawn, underachieve or show other signs of disturbed behaviour.
81. A child witnessing domestic abuse and/or domestic violence will be experiencing emotional abuse and possibly other forms of abuse or neglect as well.
82. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or

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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. Sexual abuse can take place online, and technology can be used to facilitate face-to-face 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 by other children is a specific safeguarding issue in education.

83. Indicators of sexual abuse include damage to or soreness in genitalia, anus or mouth, sexually transmitted disease, pregnancy, urinary tract infection, inappropriate sexual knowledge, sexually provocative behaviour, personality or character change, poor trust in significant adults, insecure or regressive behaviour or self-harm. Many children who are sexually abused will have no visible signs due to the attacker not wanting to leave evidence.
84. **Neglect:** This is persistent failure to meet a child's basic physical and psychological needs, which is likely to result in serious impairment to their health and development. This may involve a parent or carer failing to provide food, shelter, clothing or a failure to protect from physical or emotional harm or danger, not ensuring adequate supervision, or not allow access to medical care or treatment. It may also include the neglect of a child's basic emotional needs.
85. Neglect may also result in a child being diagnosed as suffering from 'faltering growth' also known as 'failure to thrive'. This would usually be diagnosed in a young child by a medical practitioner.
86. Indicators of neglect include constant hunger or tiredness, frequent lateness or non-attendance, destructive tendencies, poor social relationships, poor personal hygiene, poor general health or untreated medical problems.

Staff also need to be aware of other specific forms of abuse further details of which can be found in Annex B of KCSIE:

87. **Female Genital Mutilation (FGM):** This involves procedures that include the partial or total removal of external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious consequences for physical and mental health. **FGM is illegal in the UK.**
88. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police that FGM appears to have been carried out on a girl under 18. Teachers must personally report to the police although referral to the DSL / Social Care should also be done.
89. Victims of FGM are likely to come from a community that is known to practise FGM. Specific risk indicators include:
 - a. Poor integration of the family into UK society
 - b. The daughter of a woman who has undergone FGM or where another close family member such as a sister has undergone FGM
 - c. Any girl withdrawn from PSHE lessons particularly if from a high risk group and specially if the lesson is about sex or FGM

- d. The visit of a family elder from the country of origin to a family where a daughter is of FGM age (typically 5 -8 although FGM has been performed on girls from infancy to 15 years of age)
 - e. A girl talking about FGM; reference by a girl to a special procedure; a girl going on a long or unexpected holiday to the country of origin or where FGM is practiced
 - f. Changes in behaviour, medical issues unspecified requested for help from an adult particularly if medically orientated.
90. If a girl has been recently cut or is at imminent risk, 999 should be called. Safeguarding procedures should be followed if FGM is reported or suspected and specific guidance sought from the police and social care.
91. **Preventing radicalisation:** The Prevent Duty document from the Department of Education clearly identifies the definition of, how schools should comply and how schools can seek guidance for the prevention of extremism and radicalisation in pupils.
92. All staff are Prevent trained and are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Staff know to be aware of changing in a pupil's behaviour, which may indicate extremism such as the expressing or withholding of views. The DSL is the School lead on the Prevent duty and should be contacted about any concerns of a radicalisation or extremism nature.
93. Advice can be sought from the Department of Education dedicated telephone helpline on 020 7340 7264 or via email on counter.extremism@education.gsi.gov.uk or from the police on 101. In an emergency 999 should be called.
- 94. Child Sexual Exploitation:** 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
 - b. For the financial advantage or increased status of the perpetrator or facilitator.
- And/or

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. CSE may be a form of Peer-on-Peer abuse. **Child Sexual Exploitation is illegal in the UK.**

95. In CSE, the perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. Some young people who are being sexually exploited do not exhibit any external signs of this abuse.

96. **Child Criminal Exploitation:** Child Criminal Exploitation (CCE) is a form of abuse where an imbalance in power is used to coerce, manipulate or deceive a child into criminal activity. This can be a one-off event or a series of incidents over time instigated by an individual or a group.
97. **Domestic violence:** This is underestimated in the UK. Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged over 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality is defined as domestic abuse. The abuse can encompass, but is not limited to:
- a. Psychological
 - b. Physical
 - c. Sexual
 - d. Financial
 - e. Emotional.
98. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life. There is a proven link between domestic violence and child abuse.
99. Domestic abuse is more prevalent at times when adults and children have less freedom of movement and are confined within the home. All staff need to be vigilant for signs of domestic abuse when remote learning is necessary.
100. **Forced marriage:** This is when one or both spouses do not or cannot consent to the marriage and duress is involved. This can include physical, sexual, emotional and financial pressure. Indicators of forced marriage include sudden and unexpected foreign travel, withdrawal from education and behavioural changes. Forced marriage is different to arranged marriage where consent is freely given. **Forced marriage is illegal in the UK.**
101. **Children missing from education:** A child going missing from education is a potential indicator of abuse or neglect, travel to a conflict zone, FGM or forced marriage. Foundation staff should treat prolonged or repeated absence or particular patterns of absence with no satisfactory explanation as a potential safeguarding issue and take action accordingly by following the Child Missing Education policy relevant to the particular school. A record of children missing from education should be kept, particularly if absence is repeated, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of them going missing in the future. All staff should be alert to signs to look out for and for the individual triggers to be aware of (as detailed in this policy) when considering the potential safeguarding concerns such as travelling to conflict zones (radicalisation), FGM and forced marriage.
102. **Peer-on-Peer abuse** can lead to safeguarding issues. This may include but is not limited to:
- a. Bullying (including cyber-bullying)

- b. Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
 - c. Sexual violence and sexual harassment
 - d. Sexting (also known as youth produced sexual imagery or the sharing of nudes and semi-nudes)
 - e. Initiation/hazing type violence and rituals.
103. Abuse is abuse and is not acceptable within the Dean Close Foundation. It will not be tolerated or passed off as banter, just having a laugh or part of growing up. All allegations of peer-on-peer abuse will be taken seriously and investigated in line with the Peer-on-Peer Abuse Policy (W055).
104. **Sexual violence and sexual harassment between children in schools:** This can occur between two children of any age and sex and is never acceptable. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can be gendered in nature.
105. Sexual violence and harassment exist on a continuum and may overlap, they can occur online and face-to-face and are never acceptable. All victims will be taken seriously and will be offered support in school. All instances of sexual harassment or violence will be reported to the DSL.
106. The Foundation is committed to tackling behaviour that could be construed as sexual violence or harassment and providing education through PSHE, tutorials and other means. Staff are aware that children can and do abuse their peers in this way. In particular the Foundation will challenge:
- a. Behaviour and 'banter' of a sexualised nature e.g. not dismissing sexual comments or allowing inappropriate touching
 - b. Challenging sexual jokes, stories or comments
 - c. Online sexual harassment
 - d. The understanding of consent and whether it has been freely given.
107. **Upskirting** is now a criminal offence under the 2019 Voyeurism Act. Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks or to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
108. The Foundation will take any allegation of upskirting seriously and will investigate thoroughly. A severe sanction may be given or the police informed.
109. The Foundation is aware that certain groups of pupils such as girls, SEND, EAL and LGBTQ+ are at greater risk of sexual violence and harassment.
110. Peer-on-peer abuse will be investigated and recorded in the same way as any other bullying or safeguarding incident. Investigations will be carried out using the guidelines set out in the anti-bullying and/or Safeguarding and Child Protection and/or Peer-on-Peer Abuse policies. Both the victim and the perpetrator will be offered support but depending on the severity of the incident, the perpetrator can expect to be sanctioned as described in the appropriate behaviour policy.

111. Pupils may be exposed to serious violence in school or the wider community. All staff should be aware of indicators that signal that pupils are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older people, a significant decline in performance, mental health or wellbeing deterioration, unexplained injuries or accounts of assault. Unexplained gifts or new possessions could indicate criminal network or gang involvement.
112. Other Safeguarding and Child Protection issues that staff need to be aware of include:
- a. Bullying including cyber-bullying (*see Anti-bullying Policy W045*)
 - b. Illegal substances including drugs
 - c. Faith abuse
 - d. Gangs and youth violence
 - e. Child criminal exploitation
 - f. Gender-based violence and violence against women and girls (VAWG)
 - g. Mental health
 - h. Sexting and other online abuse (*see Youth Produced Sexual Imagery Policy W051*)
 - i. Teenage relationship abuse
 - j. Trafficking
 - k. Child missing from home or care
 - l. Fabricated or induced illness
 - m. Peer-on-Peer Abuse (*see Peer-on-Peer Abuse policy W055*)
 - n. So called 'honour-based violence'

Mental Health

112. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
113. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
114. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff must be aware of and respond to how these children's experiences, can impact on their mental health, behaviour and education.
115. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the steps set out in paragraph 48.

Appendix A

Designated Safeguarding Lead (DSL) – job description

1. To lead in facilitating the development of Safeguarding and Child Protection policies, training and procedures and guidance for each school within the Foundation, ensuring that the Safeguarding and Child Protection Policy is reviewed annually by the Board of Trustees.
2. To ensure that the School Safeguarding and Child Protection Policy is reviewed at least annually by the Foundation DSL and that the procedures and implementation are updated and reviewed regularly.
3. To ensure that robust online safety procedures are in place and are followed that are appropriate to the age of the pupils. To make sure that internet use via the school network is both monitored and filtered.
4. To undertake appropriate Child Protection Training at least every 2 years in order to:
 - a. Understand the assessment process for providing Early Help and intervention, e.g. through locally agreed common and shared assessment processes such as Early Help assessments
 - b. Understand how the GSCE conducts Child Protection Case Conferences and be able to attend these effectively when required to do so
 - c. Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection Policy and procedures.
5. To undertake appropriate Prevent Training:
 - a. To ensure staff are able to identify children at risk from being drawn into terrorism
 - b. Ensure that staff are aware of the DfE Prevent Duty documentation
 - c. Ensure that all staff receive appropriate Prevent Duty training
6. To ensure that all staff are provided with induction training, are aware of the identity of their DSL and Deputy DSL and have signed to say they have read:
 - a. The School's Safeguarding and Child Protection Policy
 - b. The staff Codes of Conduct
 - c. Part One and Annex B of KCSIE (those in contact with older pupils should also read Part Five)
 - d. The Foundation Whistleblowing policy
 - e. Are aware of all other school and Foundation policies concerned with pupil welfare
7. To provide training and support, on a regular basis, and in accordance with the requirements of GSCE to all School staff (including newly appointed) and volunteers who work with pupils so that they are aware of School Safeguarding and Child Protection arrangements. To also ensure that all new staff are aware of the Whistleblowing policy.
8. To ensure that all staff are aware of the risks of radicalisation in young people; how to identify signs of radicalisation and how to recognise those pupils most at risk of radicalisation.
9. To keep staff aware of Safeguarding and Child Protection procedures.
10. To have an understanding of GSCE procedures.

11. To refer allegations of cases of suspected abuse to Children's Social Care or Police as appropriate, making contact with either of them within 24 hours of a disclosure or suspicion of abuse, in writing or with written confirmation of a telephone referral.
12. To make prompt contact with the LADO in relation to allegations made against someone working at the school and/or with the police if a criminal offence is suspected.
13. To receive and coordinate referrals, arranging action and reviewing services for children and families.
14. To maintain accurate, confidential and up-to-date documentation (written or online) on all cases of Safeguarding and Child Protection, ensuring that all records are forwarded to any new school the pupil may attend and the appropriate request made of the previous school for the Safeguarding and Child Protection records.
15. To work directly with children 'in need' and their families in order to promote, strengthen and develop the potential of parents/carers and their children in order to prevent children becoming looked after and/or suffering significant harm.
16. To support the care of children where their living arrangements are at risk of breakdown (including Local Authority placements).
17. To ensure that children who have suffered or are at risk of suffering serious harm are reported to Social Care immediately and that a multi-agency assessment is requested using the GSCE Multi Agency Service Request Form (MARF).
18. To ensure that pupils who are victims of abuse are supported appropriately and sensitively and that all actions assigned from planning and intervention meetings are successfully carried out and monitored.
19. To have a knowledge of multi-agency working in the local area.
20. To inform the Headmaster or Headmistress of Safeguarding issues especially ongoing enquiries under Section 47 of the Children Act 1989 and Police investigations
21. To have at least termly meetings with the appropriate Safeguarding and Child Protection Trustee and ensure that the said Trustee has any relevant information to facilitate Safeguarding and Child Protection discussion at Board of Trustee level
22. To act as a source of support, advice and expertise to staff on matters of Safeguarding and Child Protection and when deciding whether to make a referral by liaising with relevant agencies.
23. To ensure that the School is always presented positively within and beyond the setting and to encourage a culture of listening to pupils and taking account of their wishes and feelings on any measure the School might have taken to protect them.
24. To ensure that staff are aware of training opportunities and GSCE guidance.
25. To develop effective links with relevant statutory and voluntary agencies.
26. To ensure that GSCE has access to the School Safeguarding and Child Protection policy and that the policy is published on the School's website.

27. Attend and participate in Child Protection Conferences and planning and review meetings whilst working closely with colleagues in Children's Services and meetings with other Agencies, as required.
28. To maintain confidentiality at all times.
29. To identify vulnerable children within the School and ensure that all staff are made aware of who these children are.
30. To ensure a record is kept of staff Safeguarding and Child Protection training.
31. To ensure that pupils receive age appropriate Safeguarding and Child Protection training in school.
32. To ensure that Safeguarding and Child Protection is included in the School curriculum, appropriate to pupil age.
33. To ensure that all staff are aware of the Child Missing from Education policy and procedures.
34. To undertake other duties that relate to Safeguarding and Child Protection matters.

Foundation Lead for Safeguarding – job description

35. To report to the Warden (CEO).
36. To visit all schools within the Foundation and request information relating to safeguarding and child protection on a regular basis
37. To have safeguarding and pupil welfare oversight for all Foundation schools, advising on procedure and staff appointment.
38. To be the lead for safeguarding and welfare policy development.

APPENDIX B

Staff Code of Conduct

Introduction

1. The Dean Close Foundation takes pride in the friendly and supportive atmosphere that exists between members of staff and pupils. The lack of barriers between pupils and staff creates a happy and productive working atmosphere but all colleagues must be aware that they have a professional relationship with pupils and that discretion must be exercised at all times. There is a difference between being friendly towards pupils and behaving as their friend.
2. Allegations of unprofessional or improper conduct can arise and it is the duty of all members of staff to behave professionally at all times. The purpose of this Code of Conduct is to ensure that colleagues know what acceptable and unacceptable behaviour is in order to maintain the safety of the pupils and guard against allegations of impropriety.
3. It is important that all adults working with children understand that the nature of their work and their responsibilities relating to it, places them in a position of trust. At Dean Close, the welfare of pupils is paramount so it is the responsibility of all adults to safeguard and promote the welfare of pupils. Members of staff are responsible for their own actions and behaviour and should avoid any conduct, which would lead a reasonable person to question their motivation and intentions.
4. This guidance is not exhaustive and is designed to set out principles rather than to give detailed and specific advice as the circumstances in which staff work vary.
5. Key documents which inform this policy include:
 - a. Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings 2009
 - b. Keeping Children Safe in Education September 2021.
6. Other Dean Close policies which relate to this guidance include:
 - a. Safeguarding and Child Protection policy (W044)
 - b. Confidentiality policy (W066)
 - c. The Use of Force to Control or restrain Pupils policy (S116 and P218)
 - d. Arrangements for searching pupils and their possessions (S117)
 - e. Relationships, Sex and Health policy (S118 and P210)
 - f. Staff Social Media policy (W057)
 - g. Anti-bullying policy (W045)
 - h. First aid policy (S111)
 - i. Acceptable use of ICT (S112 and P214)
 - j. Guidance on Acceptance of Gifts (W001)
 - k. Adults Staying in Boarding Houses (W004)
 - l. Behaviour policy
 - m. Data Protection policy (W008)
 - n. Educational Visits policy
 - o. Whistleblowing policy (W035)
 - p. Youth Produced Sexual Imagery Policy (W051)
 - q. Peer-on-Peer Abuse Policy (W055).

Duty of care

7. This is the duty, which rests upon each School, and the staff within it to ensure that all reasonable steps are taken to safeguard the safety of pupils involved in any activity for which the School is responsible. All staff have a duty to keep pupils safe and protect them from sexual, physical and emotional harm. Children have the right to be safe and to be treated with respect and dignity.
8. Members of staff are accountable for the way in which they exercise authority, manage risk, use resources and protect pupils from discrimination and avoidable harm. The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.
9. The School has a duty of care towards employees, which requires the provision of a safe working environment for staff and guidance about safe working practices. Staff who are subject to an allegation will be supported and the principles of natural justice applied
10. Staff should not engage in any discriminatory behaviour towards pupils or colleagues of either a positive or negative nature.

Confidentiality

11. Members of staff have access to confidential information about pupils in order to undertake their everyday responsibilities. This should not be used for their own or others' advantage and must not be used to intimidate, humiliate or embarrass the pupil.
12. Generally, this information should only be shared in serious incidences or when abuse is alleged or suspected. If a member of staff is in any doubt about whether to share information or keep it confidential, guidance should be sought from the DSL or another member of SLT.

Making a professional judgement

13. There may be occasions when adults have to make decisions or take action in the best interests of the child, which could contravene this guidance or where no guidance exists. Individuals are expected to behave professionally and in the best interests of the child. Any actions which could be misinterpreted should be reported to a member of SLT without delay.

Power and positions of trust

14. All adults working in School are in a position of trust which can be defined as one in which one party is in a position of power or influence over the other. It is essential that this unequal balance of power is not used for personal advantage or gratification.

Propriety and behaviour

15. Members of staff should always behave in a manner, which maintains the confidence and respect of colleagues, pupils, parents and the general public. They should not behave in a way, which would lead a reasonable person to question their suitability to work with children or act as a role model. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. Staff should be aware that this extends to using judgement and integrity about behaviour in places other than at School.

16. The School is a no smoking campus. Pupils are punished if caught for smoking within school bounds and should not see members of staff doing so. Away from school premises caution should still be exercised.
17. The pupil Code of Conduct states that pupils are not allowed to drink alcohol without permission and should not be inebriated. Whilst it is acceptable for members of staff to drink in front of and with 6th form pupils, it is important to be prudent.
18. It is acceptable for members of staff at DCS to consume alcohol with pupils of legal age in moderation and in controlled circumstances with the knowledge of a member of SLT, usually via a risk assessment if away from School premises. National law applies in all circumstances where alcohol is consumed.
19. Colleagues should never procure alcoholic drinks for any pupils which could lead to excessive drinking.
20. Colleagues who meet pupils, by chance, in unofficial situations such as clubs or bars should refrain from purchasing alcoholic drinks for them or behaving in a manner that would be seen as inappropriate by a reasonable person. This may also apply to parents.

Dress and appearance

21. Members of staff should dress in ways, which are appropriate to their role. Staff should not wear clothing that could be viewed by a reasonable person as offensive, revealing or sexually provocative. Please refer to the Staff Handbook for further guidance.

Gifts, rewards and favouritism

22. *Please see Dean Close Foundation Guidance on Acceptance of Gifts*
Guidance for acceptance of gifts by staff from parents or other parties is outlined in the above policy.
23. The giving of gifts or rewards to pupils should be part of an understood process for supporting positive behaviour or recognising particular achievements. The selection of pupils for gifts or rewards should be fair, transparent and involve items of appropriate value. It is essential that the giving of gifts is not misinterpreted as a gesture to bribe or 'groom' a pupil. Therefore, perceptions of favouritism or injustice should be avoided.

Infatuations

24. Occasionally a pupil may develop an infatuation with an adult. The adult should deal sensitively and appropriately with the situation in order to maintain the dignity and safety of all concerned. Such infatuations carry a high risk of words or actions being misinterpreted so staff should make every effort to ensure that their own behaviour is above reproach and report any concerns to a senior colleague.

Communication with pupils

25. *Please see Pupil and Staff acceptable use of ICT policies*
E-safety risks are posed more by behaviours and values than by the technology itself. Staff must ensure that they maintain safe and responsible online behaviours.
26. Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries. Adults should not share personal information with a pupil and they should ensure that all communications are transparent and open to scrutiny. Where possible,

communication with pupils should be through official school channels such as school e-mail addresses or phone extension. This is not always practical and caution must be taken when using other forms of communication.

27. Texts may be an appropriate way to communicate with older pupils. The content of the text should be brief and business-like. Texts should not be sent at inappropriate times of the day or during the holidays unless urgent. Personal texts should not be exchanged with current pupils. The same guidance applies to mobile phone conversations and written exchanges such as letter or e-mail. (*See Acceptable use of IT for Staff (W056) and Staff Social Media (W057) policies*).
28. Caution should be exercised when sending photos via mobile phone. Out of context these can be misconstrued.
29. Members of staff in EYFS should not use mobile phones and/or cameras unless following procedures as outlined in DCPPS Mobile Phone and Camera Policy (PP312) or SJPPS Mobile Phone and Camera Policy (SJPP509).
30. Many pupils use social networking sites such as Facebook. Staff should be wary of disclosing any personal information that is accessible to pupils on such sites. Any photographs that are uploaded should not be potentially embarrassing to the member of staff or other colleagues, pupils or the Foundation.
31. If a member of staff has access to web pages created by pupils, caution should again be exercised. Inappropriate material involving pupils or colleagues viewed and not reported by a member of staff to SLT could be regarded as misconduct.
32. Be aware that any conversation or interaction with a current pupil either on or off the school premises is part of a professional relationship and will be legally viewed as such.

Social contact

33. Members of staff should not establish or seek to establish contact with pupils for the purpose of pursuing a friendship. Any social contact, such as tutor outings, should be approved and risk assessed in advance and the appropriate colleagues informed. Standing risk assessments exist for some activities. Where social contact exists between parents and staff, behaviour and communication on school matters should be appropriate.
34. Tutor outings are an important part of the tutorial system at Dean Close and staff are encouraged to arrange outings on a termly basis. Other than exceptional circumstances, it is unlikely that outings involving only one pupil, or individual visits to the tutor's home without prior parental consent would pass a risk assessment.

One to one situations

35. Members of staff teaching one pupil, or conducting a one-to-one meeting or tutorial should take particular care in the following ways:
 - a. Use a room in which the meeting can be seen through a window or open door
 - b. If there is any concern, a colleague should be informed before the meeting takes place
 - c. All physical contact should be guided by the information above

- d. In conversation colleagues or other pupils should not be discussed; any sexual innuendo and displays of affection other than that which is required to meet the needs of the meeting should be avoided
 - e. This includes individual tutor outings.
36. Extra caution should be taken if a 1:1 meeting is necessary via a phone or video link. The purpose and time of the meeting should be sent to the pupil and a parent or guardian in advance who should be given the option of being present during the meeting. If anything of concern occurs during the meeting it should be stopped and the concern reported to a member of SLT without delay
37. Some pupils may be in a fragile or emotional state when a meeting takes place. In these circumstances, extra vigilance must be taken not to heighten any distress. If concerns are raised about the words or actions of a pupil during one-to-one contact, or that words or actions by the member of staff may be misinterpreted, the details should be reported to a member of SLT as soon as possible.

Sexual contact

38. Sexual relationships between pupils and members of staff may be regarded as a criminal offence and will always be a matter of disciplinary action. Staff should not have close relationships with pupils or have any form of communication with pupils, which could be interpreted as sexually suggestive or provocative. Staff should refrain from discussing their own sexual relationships in the presence of pupils.

Physical contact

39. Please see [The Use of Force to Control or restrain Pupils Policy](#)

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they do so in ways appropriate to their professional role as even well intentioned physical contact may be misconstrued.

40. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority; where feasible staff should seek the child's permission before initiating contact. A member of staff must report any physical contact that could be misunderstood to a member of SLT. Staff should also be aware that a pupil might seek inappropriate physical contact. This should be deterred sensitively and reported to SLT.
41. There may be occasions when a distressed child needs comfort and reassurance and this may involve physical contact. Professional judgement should be used to ensure that professional boundaries are maintained.
42. Members of staff who work in settings such as sport, drama or outdoor activities or who teach specific subjects such as PE or music, will have to initiate some physical contact for example to demonstrate or prevent injury. This contact should take place in a safe and open environment, where the actions can be easily observed, and last for the minimum time necessary. Contact should be relevant and sensitive to signs of discomfort. Any incidents of physical contact that cause concern should be reported. It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities.
43. The law permits a member of staff to use such force as is reasonably necessary in the circumstances for the purpose of preventing a pupil from committing any offence, causing personal injury or damage to property, or engaging in any behaviour prejudicial to the maintenance of good order and discipline

at the School or on School business, among any of its pupils, whether that behaviour occurs during a teaching session or otherwise. The minimum necessary force should be used and only as a last resort when other strategies have failed.

Behaviour management

44. Please see Behaviour policy

All pupils have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour. Adults should not use any form of degrading treatment to punish a child. Any sanctions or rewards should comply with school policy.

Personal care

45. All pupils have a right to safety, respect, privacy and dignity particularly when in a state of undress, changing clothes, bathing or undertaking any form of personal care. However, there is also a need for an appropriate level of supervision in order to safeguard pupils and/or satisfy health and safety considerations. Adults need to be vigilant about their own behaviour to ensure a balance is struck. Staff should announce their presence in changing or dormitory areas and avoid any visually intrusive behaviour.

First aid and administration of medication

46. Please see First Aid policy

The Health Centre should be informed of all pupil medication. All medical concerns should be referred to the Health Centre.

Transporting pupils

47. It may be necessary for a member of staff to transport a pupil in their own vehicle. If possible, there should be an additional adult acting as an escort or another pupil present. Staff need to ensure that:

- a. They are fit to drive and that there is nothing to impair their judgement or ability to drive
- b. That the vehicle is roadworthy
- c. All passengers wear seatbelts
- d. They have the proper and appropriate insurance
- e. That a senior colleague is informed of any impromptu or emergency arrangements if possible and if not that they are recorded as soon as practicably possible.

Educational visits

48. Please see Educational Visits policy

Adults on educational visits, of any length and including tutor outings, remain in a position of trust and need to ensure that their behaviour remains professional at all times. Staff need to ensure that:

- a. A proper risk assessment has been drawn up and approved in advance
- b. There is an appropriate staff to pupil ratio and that the gender mix reflects the pupils involved.

Photography and videos

49. The taking or recording of images should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and wellbeing of pupils. Images should not be kept on private devices but stored appropriately within the school system.
50. There are no circumstances that will justify adults possessing indecent images of children. Accessing, making and storing indecent images of children is illegal. Adults should not use school equipment to access adult pornography; neither should personal equipment containing these images or links to them be brought into school. Staff should ensure that pupils are not exposed to any inappropriate images or web links.

Curriculum

51. Please see Relationships Sex and Health policy

Many areas of the curriculum can include or raise subject matter, which is sexually explicit, or of an otherwise sensitive nature which can sometimes lead to unplanned discussion about challenging issues. Responding to this type of question or discussion requires careful judgement and staff need to be aware of personal and professional boundaries.

Whistleblowing

52. Please see the Dean Close Foundation Whistleblowing policy

Members of staff have a responsibility to bring matters of concern to the attention of SLT: This can be done in good faith without fear of repercussion.

Sharing concerns and recording incidents

53. All allegations against staff must be taken seriously and properly investigated by a member of SLT or the DSL. Adults who are the subject of allegations are advised to contact their professional association. All members of staff should feel able to discuss difficulties or problems with an appropriate colleague or member of SLT. It is essential that records are maintained when concerns are raised about staff conduct.

Appendix C

Safeguarding and Remote Teaching and Learning

There may be circumstances such as a school closure or prolonged illness when the Foundation requires teachers to teach pupils remotely or provide blended learning. In this eventuality the following points should be considered:

1. Pupils should be contacted via methods that have been approved by the Foundation. These include:
 - a. School email
 - b. iSAMS
 - c. Microsoft Teams or other package originating from a school email address
 - d. Google Classroom and Hangout originating from a school account
 - e. Any VLE platform set up by the school
 - f. Video conferencing packages approved by the school and operated via a school account such as Zoom or Screencastify
 - g. Text originating from a school account or phone

2. The following methods of communication should not be used unless originating from a school account:
 - a. Social media including Snapchat, WhatsApp and TikTok
 - b. Text **not** originating from a school account or phone
 - c. Personal email addresses

3. Teaching groups of pupils via a variety of media is highly recommended during a school closure or prolonged absence, however:
 - a. If using a camera feed the teacher should ensure that they are properly dressed and there is nothing in the background of the picture that could cause distress or upset.
 - b. If possible remote learning should originate from school. If this is not possible a suitable home location needs to be identified.
 - c. All pupils that can be seen during a remote learning lesson should also be properly dressed and in a suitable location.
 - d. Where possible 1:1 remote tuition should be avoided particularly for younger pupils. Circumstances where it might be appropriate include:
 - i. What would normally be 1:1 e.g. ELT, SEN, Music, Drama or tutorials
 - ii. When an individual pupil is away from school
 - iii. Where personal coaching for example in preparation for an exam is necessary
 - e. Any 1:1 remote learning should be conducted in an open space where it can be observed and not in a closed office or classroom with no visibility.
 - f. The pupil and parent/guardian should be informed in advance that the remote teaching session is to take place and to allow the adult to be present in the session if they wish

- g. The 1:1 session can be recorded with the permission of the parent/guardian
 - h. If anything untoward such as a comment or gesture occurs in a remote learning lesson, it should be reported to a member of SLT or the DSL directly.
4. Anything of a safeguarding nature that is disclosed during a remote learning lesson should be reported to the DSL in the normal way.

Appendix D – for use if CPOMS is not available

Dean Close Pastoral Concerns Form

This form can be used to record any concern about a pupil's welfare and/or a Child Protection issue. Once complete, pass this form onto the DSL and/or pastoral member of staff

Date:	Person raising concern:
Name of pupil of concern: House / Form:	
Details of concern raised (include who, what, when and where; the names of witnesses if relevant; details of any immediate action; attach any other relevant documentation):	
Details of conversation (where possible record both the pupil's and your actual words):	

Other people who witnessed or know of the situation:

Follow up action required:

Further action and details:

Resolution of concern:

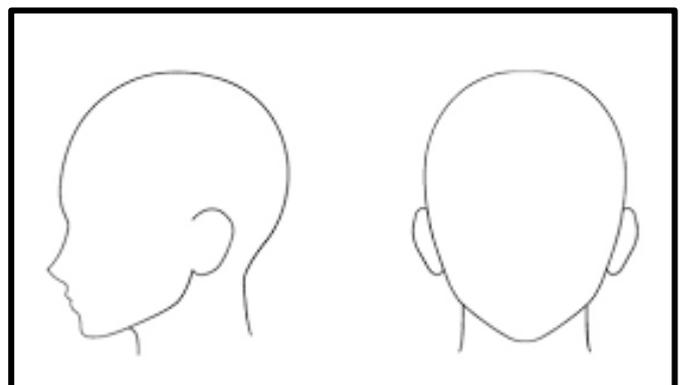
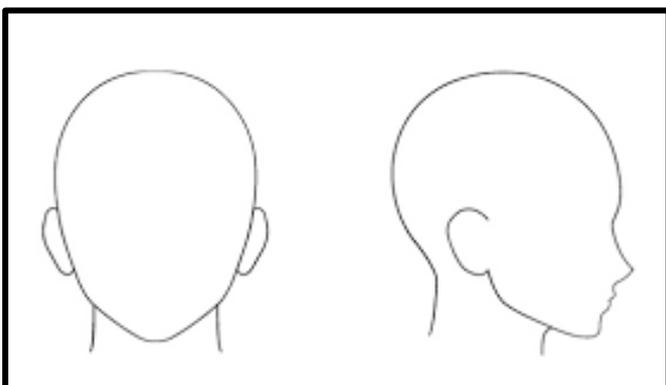
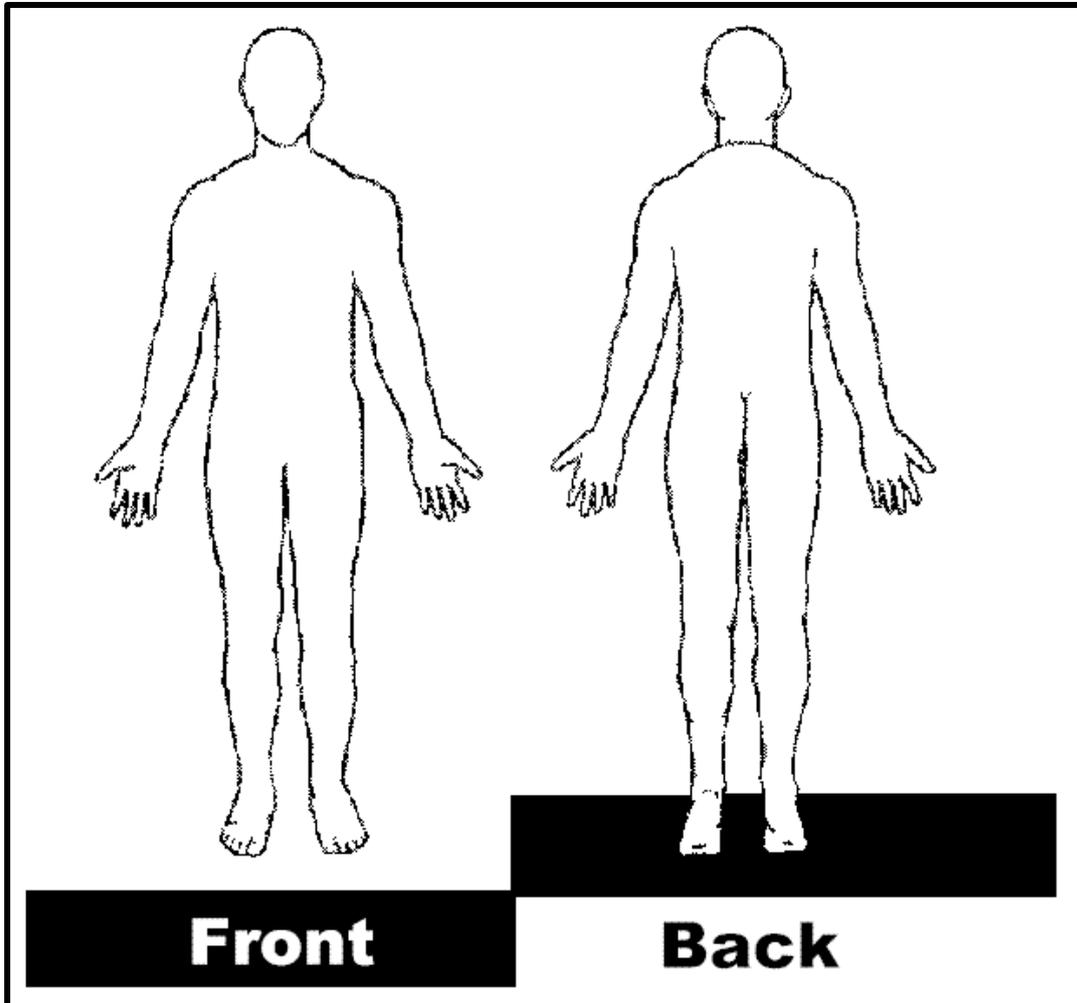
Date	Action	People involved

Documents connected to concern:

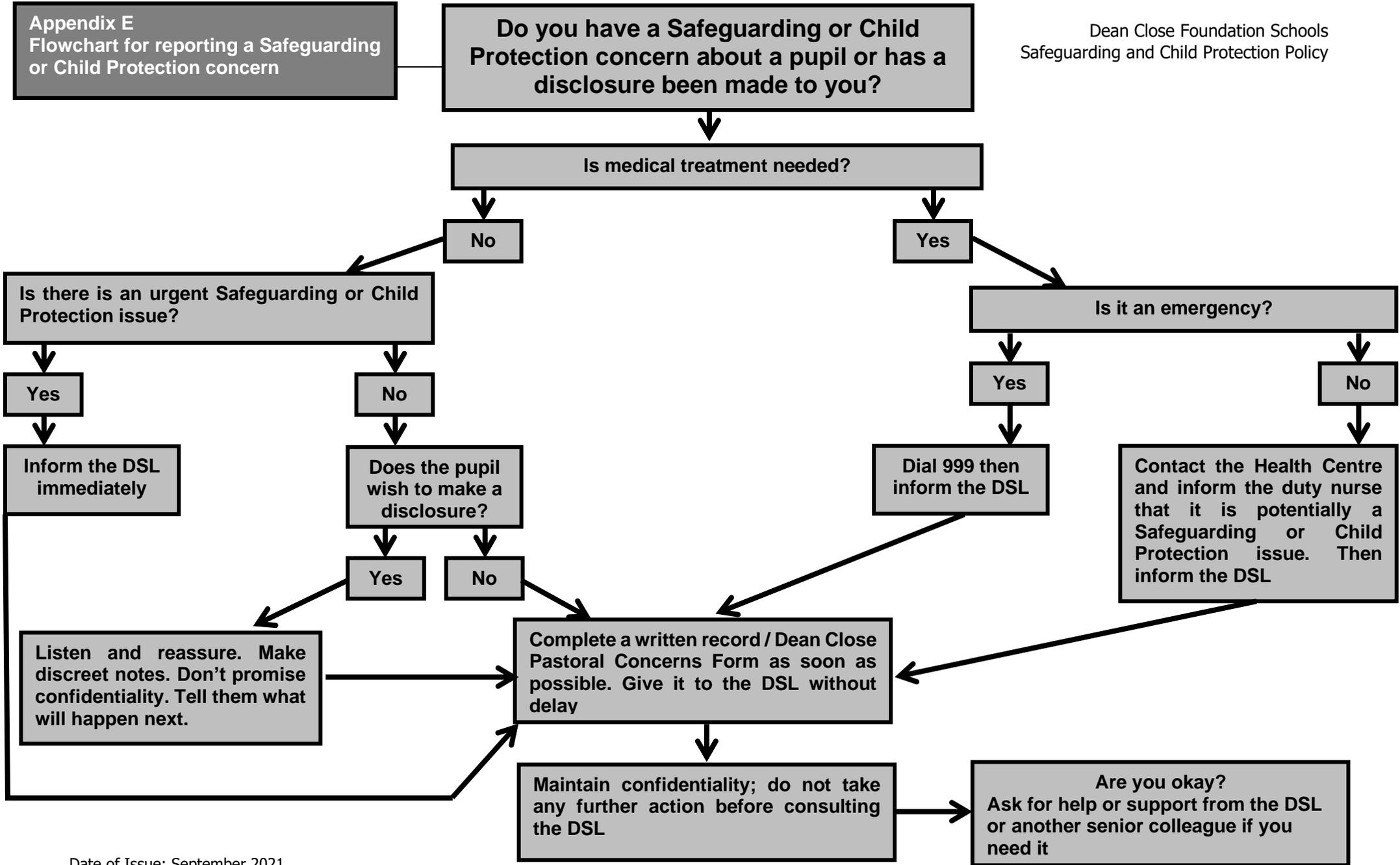
Name	Date	Location

Use and complete the body map if appropriate to record Safeguarding or Child Protection concerns.

DO NOT REMOVE CLOTHING



Appendix E
Flowchart for reporting a Safeguarding or Child Protection concern



Staff/Volunteer Disqualification Declaration (Appendix F)

This form is to be completed by all relevant staff and volunteers as part of pre-employment checks. All relevant staff to complete this form annually.

Full Name:

Address:

.....

Please respond to the questions listed below and sign the declaration to confirm that there are no reasons why you should not be working with children. If you are unable to meet any of the following aspects, please disclose this immediately to Head/Bursar. The information contained in this declaration will be held by the School in strictest confidence and used as set out in the School's Recruitment Privacy Notice and Data Protection Policy. Please circle yes or no against each point.

Your personal situation

- | | | |
|---|-----|----|
| <ul style="list-style-type: none"> • Have you been barred from working with children (i.e. does your name appear on the DBS Barring List)? | Yes | No |
| <ul style="list-style-type: none"> • Have you been cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, either at home or abroad? (Please see a list of the relevant offences set out in the Appendix below.) | Yes | No |

Care of Children

- Have your own children been taken into care as a result of the care provided by you? Yes No
- Have your own children been the subject of a child protection order? Yes No
- Have you had your registration cancelled in relation to childcare or children's homes or have you been disqualified from private fostering? Yes No
- Are you 'Disqualified from Caring for Children'? Yes No

If you have answered 'yes' to any of the above, please provide further information below. This information will be used to determine whether or not you are disqualified from working with children. Please note that when providing further details, you do not need to provide details about any protected cautions or protected convictions. You are also not required to disclose spent cautions or convictions of a person who lives or is employed in your household. Please ask the Bursar for more information.

.....

.....

Date of Issue: June 2021

Review Date: June 2022

Owner: Foundation Lead for Safeguarding

.....

Please note: Staff who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. A factsheet explaining the process can be found on this link: <https://www.gov.uk/government/publications/applying-to-waive-disqualification-early-years-and-childcare-providers>. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Bursar for more details.

I understand my responsibility to safeguard children, and I am aware that I must notify my manager immediately of anything that may affect my suitability to work with children.

I will ensure that I notify my employer immediately of any convictions, cautions, court orders, reprimands or warnings I may receive.

SignedDate

For line manager:

I have reviewed the above and confirm that no further action is to be taken.

Line Manager signature Date

OR

I have reviewed the above and the following action has been taken:

.....

Signed Date action taken

Appendix: List of relevant convictions which can be found here:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/384712/DBS_referrals_guide_-_relevant_offences_v2.4.pdf

Please note that due to changes in legislation, this list may not be exhaustive. If you have any queries or concerns, please contact the Bursar.

Appendix G: Low Level Concerns

1. The Dean Close Foundation has processes and procedures in place to manage any safeguarding concerns about a staff member (including supply staff, volunteers and contractors). Paragraphs 50 and 51 of this policy detail the procedures that should be followed if an allegation of abuse by a member of staff is made.
2. It is also the duty of Foundation to ensure that low level concerns, which don't meet the allegation thresholds outlined in paragraph 50-part c, about a member of staff are also recorded so that any potential patterns of inappropriate behaviour can be identified.
3. A low level concern is any concern, no matter how small, that an adult may have acted in a way which
 - a. Is not consistent with the Foundation Code of Conduct found in appendix B of this policy
 - b. Related to their conduct outside of work that has causes a sense of unease about that adult's suitability to work with children.
4. Staff do not need to determine whether the actions of an adult can be defined as a low level concern or whether they reach the allegation threshold they just need to make a report. It is the role of the Head teacher, in conjunction with the DSL if necessary, to make this decision.
5. Any member of staff can report a low level concern about themselves or a colleague to their line manager, the DSL of the Foundation school concerned, or alternatively, the relevant Head, the Warden or the Director of HR.
6. Foundation staff should feel confident that they can self-refer when for example they have found themselves in a position which could be misinterpreted, which might appear compromising to others and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
7. All low level concerns should be recorded in writing as part of a professional interview or by email. A database system of recording is being developed. The record should include:
 - a. The details of the concern
 - b. The context in which the concern arose
 - c. The names of the individuals (pupils and staff) involved
 - d. The name of the reporting member of staff, if anonymity is not wanted.
8. Records of low level concerns will be kept confidentially and securely and comply with GDPR legislation. In most cases, records will be destroyed 7 years after the employee leaves the Foundation.
9. Records will be regularly reviewed in order to:
 - a. Identify patterns of concerning, problematic or inappropriate behaviour
 - b. Aid decisions on the appropriate course of action to be taken

- c. Provide evidence if the records meet an allegation threshold and a referral to the LADO is made
- d. Help in the identification of possible wider cultural issues within the school or Foundation that enabled the concerning behaviour to occur and decide on a course of action to minimise the risk of repeated low level concerns

10. Spectrum of behaviour:

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law