



## **Culford School**

# **Child Protection (Safeguarding) Policy**

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## 1. Introduction

Culford School puts at the centre of its operation the safeguarding of the pupils of the school. There is a commitment to keep safeguarding at the forefront of every employee and volunteer's mind. We encourage a culture of challenge, not just to act when there is a need, but also in the way we think to ensure the risks of harm to the pupils' individual welfare are minimised.

This policy and procedures are in accordance with the following national guidance:

- **Keeping Children Safe in Education (Sept 2024) (KCSIE)**
- **Working Together to Safeguard Children (December 2023)**
- **The Prevent Duty 2023**
- **Children Missing Education 2024**
- **What to do if you're worried a child is being abused**

And locally agreed inter-agency procedures for Suffolk Safeguarding Partnership.

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children;
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

### 1.1 Key Contacts:

<b>Gavin Reynolds</b> <a href="mailto:greynolds@culford.co.uk">greynolds@culford.co.uk</a>	Assistant Head (Pastoral) 01284 385342	Designated Safeguarding Lead (DSL)
<b>Ruth-Anne Radlett</b> <a href="mailto:rradlett@culford.co.uk">rradlett@culford.co.uk</a>	Whole School Mental Health Lead	Deputy Safeguarding Lead (DPSL)
<b>Kelly Harrison</b> <a href="mailto:kharrison@culford.co.uk">kharrison@culford.co.uk</a>	Pre-Prep Senior Teacher 01284 385412	Deputy Safeguarding Lead (DPSL)
<b>Lorna Spillane</b> <a href="mailto:Lorna.spillane@culford.co.uk">Lorna.spillane@culford.co.uk</a>	Nursery Manager 01284 385355	Deputy Safeguarding Lead (DPSL)
<b>Rory Parker</b> <a href="mailto:rparker@culford.co.uk">rparker@culford.co.uk</a>	Deputy Head Prep School 01284 385387	Deputy Safeguarding Lead (DPSL)
<b>Jon Herd</b> <a href="mailto:jherd@culford.co.uk">jherd@culford.co.uk</a>	Assistant Head 01284 385490	Deputy Safeguarding Lead (DPSL)
<b>Sean Collier</b> <a href="mailto:sean.collier@culford.co.uk">sean.collier@culford.co.uk</a>	Sports Centre Manager 01284 385372	Deputy Safeguarding Lead (DPSL)

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Victoria Sanderson	Governor responsible for Safeguarding <a href="mailto:victoria.sanderson@culford.co.uk">victoria.sanderson@culford.co.uk</a>
Police Community Support Officer (PCSO)	Rachel Darvill <a href="mailto:Rachel.Darvill@suffolk.police.uk">Rachel.Darvill@suffolk.police.uk</a>
Chair of Governors - Mark Donougher	C/O Clerk to Governors <a href="mailto:clerk@culford.co.uk">clerk@culford.co.uk</a>
MIST Safeguarding Trustee	Lady Fiona Mynors <a href="mailto:fmynors.trustee@methodistschools.org.uk">fmynors.trustee@methodistschools.org.uk</a>
MIST CEO	Judith Fenn <a href="mailto:ceo@methodistschools.org.uk">ceo@methodistschools.org.uk</a>
MIST Independent Safeguarding Consultant	<a href="mailto:carolyn.eyre@btinternet.com">carolyn.eyre@btinternet.com</a>
Multi Agency Service Hub (MASH) Advice Line	0345 6061499
Customer First	0808 8004005
Suffolk Safeguarding Partnership (SSP)	suffolksp.org.uk
Local Authority Designated Officer (LADO)	<a href="mailto:LADO@suffolk.gov.uk">LADO@suffolk.gov.uk</a> 0300 1232044
Department of Education dedicated telephone line	0207 3407264 <a href="mailto:Counter-extremism@education.gsi.uk">Counter-extremism@education.gsi.uk</a>
NSPCC Whistleblowing Helpline	0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

The policy is made available to parents on the school website. The policy and procedures will be reviewed annually by the Governing Body. The procedures, and the efficiency of their dischargement, will be assessed; any deficiencies or weaknesses identified in child protection arrangements will be remedied immediately. The school will undertake an annual review of the risk for children being drawn into terrorism.

Culford is one of nine Trust Schools as part of the Methodist Independent Schools Trust (MIST). MIST Trustees have the ultimate legal responsibility for these Schools. In order to exercise these duties effectively, MIST makes extensive delegation to the School Governing Bodies. But MIST does not divest itself of legal responsibility for any action taken arising from this delegated authority.

MIST, together with the nine Schools within it, is a single legal entity. School Governors, therefore, govern their Schools in effect as sub-committees of the MIST Trustees. The Schools are, however, separately registered with the Department for Education (with MIST as their Registered Proprietor).

[MIST Safeguarding and Child Protection Policy 2024/25](#)

## 2. Culford Child Protection (Safeguarding) Policy

This policy should be read alongside the Anti-Bullying Policy, which defines bullying in the following way:

**There are different sorts of bullying but the three main types are:**

- **Physical:** any form of physical contact, to include hitting, tripping, kicking, taking or hiding belongings. Wilful interference with property, which includes hiding, damaging, removing and unauthorised borrowing.
- **Verbal:** persistent or malicious name calling; for example teasing, insulting, threatening and swearing. Any racial, religious, cultural, sexual/sexist, homophobic, disability names, words, references or suggestions are included. This also includes messages or statements written on internet sites, or as text messages, about others.
- **Emotional or psychological:** any behaviour, passive or active, which is deliberately unfriendly, including tormenting and any action which makes other people feel uncomfortable, humiliated or excluded; for example spreading rumours, looks, graffiti, intimidating gestures or social exclusion of others. This includes sending messages via text or computer to others in which derogatory or defamatory statements are made about others, and which encourage, support or involve others in abuse or bullying of a third party.

These definitions also include any form of sexual harassment, racial abuse, sexual/sexist and homophobic behaviour, religious intolerance, culturally offensive references or words, inappropriate or offensive references to disability.

Bullying also includes defamatory texts, sexting or e-mails, offensive phone calls or any other offensive electronic messages or images. It is unlawful to disseminate defamatory information in any media including internet sites, social web-sites, mobile phones, text messages, photographs, posters and emails. Banter, the playful and friendly exchange of teasing remarks, can easily be misinterpreted as bullying and as such is discouraged. Abuse is abuse and will never be tolerated or passed off as banter, just having a laugh or part of growing up.

The threshold between bullying and abuse is where a child is or might be at risk of significant harm.

**Culford School recognises that:**

- The welfare of children and young people, their families, parents and carers is the primary concern
- All children and young people whatever their age, ability, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have equal rights to protection from abuse
- It is the responsibility of the statutory agencies to determine whether or not abuse has taken place but it is everyone's responsibility to report any concerns
- All incidents of suspicious poor practice and allegations should be taken seriously and responded to swiftly and appropriately
- Children with a social worker may be more vulnerable and need additional support. The school will liaise closely with the team around the child.

### 2.1 Teaching Children to Keep Themselves Safe

Culford School believes in educating pupils to stay safe, including online, and policies contained in the School Handbook reflect this. This is done largely through the comprehensive Learning for Life (PSHCE) programme, but also through tutorials and house meetings.

Pupils and boarders can discuss any problem they may be having with Tutors, House Staff, the Medical Centre Team or the Chaplain. They can also contact BOB, a confidential in house peer counselling email service or the Pupils Independent Listener, Vicki Sanderson on 07974379128 or [vicki.sanderson@culford.co.uk](mailto:vicki.sanderson@culford.co.uk)

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Whilst all children should be protected, Culford School recognises that some groups of children are potentially at greater risk of harm than others (*both on and offline*).

For employees and volunteers, this policy should be read alongside the Staff Code of Conduct that can be found in the Employment Handbook and alongside the rules on appropriate use of restraint in Contact and Relationships with Pupils. It should also be read alongside Keeping Children Safe in Education (September 2024) Part One and Annex B (which must be read by those working directly with children), which can be found in the Culford School Safeguarding Induction Handbook for Education Based Staff and Volunteers (September 2024) or by visiting [www.gov.uk](http://www.gov.uk). This policy is also aligned to Working Together to Safeguard Children (2023).

Safeguarding is defined by the Children Act 1989 and 2004 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) as meaning that: 'Agencies and organisations working with children and young people take all reasonable measures to ensure that the risks of harm to the individual's welfare are minimised.' The Children Act 1989 states the legal definition of a child is 'a person under the age of 18' Culford School extends this definition to include all pupils in the School, even those who have reached the age of 18.

Safeguarding and promoting the welfare of children is defined in KCSIE as:

- Providing help and support to meet the needs of children as soon as problems emerge;
- Protecting children from maltreatment, whether that is within or outside the home, including online;
- Preventing impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

## **2.2 Boarding Students**

Culford School has additional factors to consider with regard to safeguarding due to having boarding students. With this in mind:

- Boarding Students will be made aware of the school's policy on sexual relationships between children and staff know the importance of boarders understanding this policy.
- Our approach to child-on-child abuse will reflect the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation.
- Our Boarding Houses have clear guidance regarding how boarders' devices are managed in terms of bringing a device into the school, any harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 3,4 and 5G that will bypass the school's filtering and monitoring systems.

## **2.3 Use of school for non-school activities**

The school requires all third party organisations including commercial letting groups to provide written policies and procedures of their safeguarding arrangements. The school shares its own Child Protection (safeguarding) policy with these groups, which includes how to work with the school following any allegations. The School's Commercial Manager is a trained Deputy Designated Safeguarding Lead who will work with the commercial groups safeguarding lead and Culford's DSL with regards to child protection and a safeguarding matters.

## **2.4 Procedure in the Case of Suspected Child Abuse**

All employees and volunteers must be aware that any child within the School may suffer physical, sexual or emotional abuse, or neglect; at home, in school or away from both settings. Abuse may be perpetrated

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by parents, or those having parental responsibility, siblings, staff, other adults or other children, within the working day or in the boarding setting, individually or in groups. Sadly, abused children are found in families from all social groups and in all settings. Colleagues should, therefore, be sensitive to behavioural and physical indicators which may draw attention to the possibility of abuse. When employees or volunteers see any signs which cause them concern they may have the opportunity to seek information, with tact and sympathy, from the child. They should report their concern to the DSL or DPSL by completing the iSAMS Wellbeing Manager, email or in person. DSL can be contacted by reception at any school.

### **3.0 Recognising Concerns, Signs and Indicators of Child Abuse**

All staff are aware of how children's experiences can impact on their mental health, behaviour, attendance and progress at school.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

#### **Signs of possible physical abuse**

- Any injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
- Injuries which have not received medical attention
- Reluctance to change for, or participate in, games or swimming
- Bruises, bites, burns and fractures, for example, which do not have an accidental explanation
- The child gives inconsistent accounts for the cause of injuries
- Frozen watchfulness

#### **Signs of possible sexual abuse**

- Any allegations made by a child concerning sexual abuse
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age
- Sexual activity through words, play or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia

#### **Signs of possible emotional abuse**

- Mental Health: Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children

- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Running away, stealing and lying

The following indicators listed under the categories of abuse are not an exhaustive list; refer to Annex B of KCSIE for additional information for a comprehensive list of specific safeguarding issues.

### **3.1 Physical Abuse**

This can involve hitting, shaking, throwing, poisoning, punching, kicking, scalding, burning, drowning and suffocating or otherwise causing physical harm to a child. It can also result when a parent or carer deliberately causes the ill health of a child in order to seek attention through fabricated or induced illness.

### **3.2 Emotional Abuse**

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

### **3.3 Sexual Abuse**

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 on the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **3.4 Neglect**

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



## 4. Indicators of Child Abuse and Neglect

### 4.1 Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM places a statutory duty on teacher to report to the police immediately. The DSL is likely to be involved in this process.

Information on when and how to report can be found at:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

### 4.2 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form or coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriage.

### 4.3 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. It is important to recognise the experience of male and female victims can be very different.

### 4.4 Preventing Radicalisation

A pupil at risk of radicalisation may display some or many of the signs of other forms of abuse but they may also become more confident, willing to offer opinions more in class and willing to discuss more things with adults, including possibly talking about religious beliefs.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

### 4.5 Child on Child Abuse

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement. Culford School takes a zero tolerance approach to abuse.

Children are vulnerable to abuse by other children. Such abuse is taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action. The School recognises that girls are more likely to be victims than boys.

Child on child abuse is most likely to include, but may not be limited to, bullying (including cyberbullying), physical (hitting, biting, hair pulling etc.), gender based violence/sexual assaults, including up skirting, (typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm); and sexting. Hazing and initiations, which refers to any activity expected of someone in joining or participating in a group that humiliates, degrades, abuses, or endangers them, regardless of a person's willingness to participate, will not be tolerated and viewed as child on child abuse.

Staff should be clear as to the policy and procedures with regards to child on child abuse and this policy should be read in conjunction with policies for e-safety, anti-bullying and Learning for Life (PSHCE).

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

Domestic abuse in intimate relationships between pupils is a form of child on child abuse.

The DSL and other key staff at Culford are AIM trained. Following a report of sexual violence or harassment, the DSL or DPSL will make an immediate risk and needs assessment, using the assessment tools provided by AIM where relevant.

Every report will be considered on a case-by-case basis with immediate consideration being given to how best to support the victim (child harmed) and the alleged perpetrator (child causing harm). When to inform the alleged child causing harm will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school or college should speak to the relevant agency and discuss next steps and how the alleged child causing harm will be informed of the allegations.

However, this does not and should not stop the school or college taking immediate action to safeguard their children, where required.

Any allegation of child on child abuse, including sexual harassment or violence, will be followed up in accordance with the Anti-Bullying Policy and those harmed will be reassured that they are being taken seriously and that they will be supported and kept safe. In

The School recognises that all parties involved, including victims, perpetrators and any other child affected by child on child abuse, will be need individual support, which could come from any member of the pastoral team including peer counsellors, external agencies (including charities) and health care professionals. Children may not find it easy to tell staff about their abuse verbally and a report may come from staff overhearing a conversation. If staff have any concerns about a child's welfare they should act immediately.

For full details of the early help process can be found in [Working Together to Safeguard Children](#).

#### **4.6 Children Missing Education (CME) or Absent from Education (CAE)**

Pupils are at risk when they have explained and or persistent absences from School. Culford is committed to identify, where possible to do so, CME, and works with the Local Authority (LA) to ensure procedures under the statutory guidance Working Together to Improve School Attendance (DfE August 2024) are met, this includes informing the LA in cases where children leave the school at non-standard transition points.

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At least two emergency contact details for each pupil are stored in the School's database system.

The school has a clear policy on situations where pupils are suspected missing during the school day.

The school periodically reviews attendance data on pupils to identify where a child has significant absences, either on repeated occasions or for prolonged periods. Where concerns are noted, the school works closely with the family and external agencies as appropriate. Positive, early intervention helps prevent the risk of them becoming a child missing education in the future.

#### 4.7 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". These 'businesses' are targeting children from more diverse range of backgrounds.

If someone is in immediate danger or a crime is taking place the police should always be called on 999. Anyone with information should contact Suffolk Police on 101 or call if they would prefer to stay anonymous call Crimestoppers on 0800 555111. Professionals and volunteers working with children can contact the MASH (Multi-Agency Safeguarding Hub) consultation line on 0345 606 1499.

#### 4.8 Extra-Familial Harms

Extra-familial harms to describe the risks that children and young people face from their peers or in the wider community including:

- Online safety
- Sexual exploitation
- Criminal exploitation
- Radicalisation
- Trafficking

#### 4.9 Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children where they see, hear or experience its side effects. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

We are in an [Operations Encompass](#) area and as such should expect the Police to report to us any situations in which they have been called to the home of a pupil who has witnessed Domestic Abuse where that pupil lives within the Suffolk Police Authority. Our contact is PCSO Rachel Darvell.

Culford may not receive information from forces where the home address is not local.

## 4.10 Online Safety

Pupils are taught on how to stay safe online through the Learning for Life programme and staff receive regular training. Areas of risk considered are:

- **Content:** being exposed to illegal, inappropriate or harmful content
- **Contact:** being subject to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams

Pupils sign an Acceptable Use Policy (AUP), and receive regular training, which is certified for some year groups. Pupils are made aware that any incidents of sexual harassment, bullying or any other form of control via their phone or smart device, or sharing indecent images either consensually or non-consensually, or sharing pornography or harmful content, will be followed up as a disciplinary issue, irrespective of when the incident occurred, either in or out of school.

The school has appropriate filtering and monitoring systems in place. The school uses Smoothwall and detailed information is shared at recruitment stage.

All staff received enhanced online safety training on a routine basis.

## 4.11 Early Help

Culford School recognises the importance of early help and staff are aware of the role they play in recording and following up concerns to try and deescalate potential situations that could lead to the abuse of vulnerable children. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from school, and / or is in Alternative Provision or a Pupil Referral Unit
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Where concerns have been raised staff should consider the wider family and other factors that may pose a risk for the child. The school will give advice, information and guidance to families to help as soon as difficulties start.

## 5.0 Equality and Diversity

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Culford recognises that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO) known as the Head of Learning Development.

[NSPCC – Safeguarding children with special educational needs and disabilities \(SEND\)](#) and [NSPCC – Safeguarding children child protection/deaf and disabled children and young people.](#)

Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. A school, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

## 6.0 Referral Procedures

The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety *and understanding the filtering and monitoring systems in place*).

Staff and volunteers should make a careful note of the injuries or behaviours which have caused concern using iSAMS Wellbeing Manager. If abuse is suspected, it will be essential to have a record of all information available. Colleagues should note carefully in writing on the iSAMS Wellbeing Manager, noting what they have observed and when they observed it. Signs of physical injury should be described in detail or sketched. Any comment by the child concerned, or by an adult who may be an abuser, about how an injury occurred should be recorded, preferably quoting words actually used, as soon as possible after the comment has been made. Staff and volunteers should listen carefully to anything the child says. A sensitive and caring response is, therefore, essential. No attempt should be made to challenge or undermine a child's story. In following up a concern the child's wishes and feelings are taken into account. If an injury is observed, Staff and volunteers may ask the child how the injury happened. Our role is to note and pass information on accurately, not to conduct the early stages of an investigation. All concerns will be followed up by the DSL or a DPSL and the responses noted and filed.

If there is still concern, e.g. if the explanation for an injury is inconsistent with the signs observed, staff and volunteers should make a careful note of what has been heard and observed, sign, date it and note the time. Great care must be taken to ensure that actions taken by any person to whom disclosure is made do not contaminate future evidence or impede investigation. This means that once the disclosure has been made, any questioning must be limited to the minimum necessary to seek clarification and

should avoid leading the child by making suggestions or asking questions that introduce the adult's own idea of what may have happened.

Employees and volunteers will not give absolute guarantees of confidentiality to children or adults as they are bound by law to ensure that all allegations of abuse are reported. They can reassure the child or adult that such information will be restricted to those persons who need to know, in order to ensure that such matters are appropriately dealt with. Sources of such information will be regarded as confidential, where this does not conflict with the safety of the child. The child will be told what is likely to happen next but, although it is appropriate to agree to support the child throughout the investigation process, it is not helpful to make promises that it is not possible to keep. The matter should be referred immediately to the DSL or DPSL Lead, who are the designated persons under the terms of the Children Act. If contact cannot be made with either of these people, it is important that a referral is made nevertheless.

Anybody can, and should, make a referral if they feel it is in the best interest of the child to do so. In most cases the safeguarding lead should be informed at the earliest opportunity. Staff can get further government guidance from ['what to do if you're worried a child is being abused'](#).

Safeguarding matters must not be investigated by school staff although they may be asked to take part in a strategy discussion or further meetings if Children's Social Care consider that there is reasonable cause to suspect that the child is suffering, or is likely to suffer, significant harm or if staff are implicated.

The DSL will report immediately to Children's Social Care where a child is at risk of serious harm.

The DSL or DPSL is responsible for record keeping and tracking each case. When concluded, documentation will be filed in the Child Protection File in the Head's Office. This will be reviewed annually by the governor responsible for Safeguarding issues.

Children who are in need of additional support from one or more agencies but who have not suffered or likely to suffer significant harm should be reported to Children's Social Care immediately, using the Common Assessment Framework (CAF) and 'team around the child' (TAC) approach.

If a pupil is identified as being at risk of radicalisation, the DSL will consider the level of risk to identify the most appropriate referral, which could include Channel or children's social care.

In serious cases or if a crime may have been committed then it will be referred to the police.

## **6.1 Allegations against Staff**

The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below or detailed in the Low Level Concerns Policy

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations

made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

Any allegations against staff should be brought to the Head in the first instance. The Head can delegate the responsibility to the DSL. The Head will inform MIST's CEO, the Chair of Governors, and the Designated Safeguarding Governor as soon as they have made the LADO referral.

If the allegation is about the Head, the Chair of Governors will inform MIST's CEO. Any member of staff can report an allegation to the MIST'S CEO or safeguarding trustee if they do not feel able to raise them in School.

The DSL is responsible for looking after the welfare of any child involved in an allegation situation which may include regularly checking on the wellbeing and/or provide or arranging support.

## 6.2 Low Level Concerns

A low-level concern is any concern, no matter how small and even if no more than a 'nagging' doubt:

- That an adult may have acted in a manner inconsistent with the School's Code of Conduct or Child Protection Policy, and
- That does not meet the threshold for referral to the LADO

Staff including supply staff, volunteers and contractors are encouraged to self-refer; this serves a number of purposes, and it demonstrates an understanding of the expected behavioural standards and is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Staff should report to the DSL or the Head, should they have concerns about the behaviour of another colleague. If the concern is about the DSL it should be reported to the Head, if it is about the Head it should be reported to the Chair of Governors and the Governor responsible for Safeguarding at Culford. Referrals can be either verbal or in writing.

The concern will always be dealt with by the most appropriate person in the school, which will usually be the Head, the DSL or the Line Manager of the individual. In most cases this is likely to be a conversation with the individual about whom the concern has been raised.

Records of all low-level concerns are recorded in writing and kept in a central low-level concerns file, not on personnel files. The individual will be provided with a copy of the record that has been made about them. The DSL and Head will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified.

Where a pattern of behaviour is identified in respect of a specific individual, the DSL and Head will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the School should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

## 6.3 Confidentiality

Sometimes, it is only when information from several sources has been shared and combined that it becomes clear that a child is at risk. Personal information about children and their families will usually be confidential and should not be disclosed to a third party without the consent of the subject. **However, the law allows for the disclosure of confidential information where this is necessary to safeguard a child or children in the public interest.** Disclosure of confidential information must be justifiable in each case, according to the particular facts of the case and must be limited to those people who need to know in order to take appropriate action.

**The Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)** does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. The governing body and senior leadership team, are aware of their responsibilities to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Where possible the DSL and DPSL will help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

## 7.0 Safer Recruitment

The School will follow its Safer Recruitment Policy in line with KCSIE. Safer recruitment starts when advertising the job vacancy and runs through each part of the recruitment process. When recruiting, interview panels will contain at least one member who has appropriate training in safer recruitment. All members of staff, Common Room and non-teaching, volunteers, Governors and some contractors who fulfil the tests of frequency, and who have unsupervised access to either pupils or boarding accommodation, are subject to formal checks through the Disclosure and Barring Service (DBS). Their appointment is subject to receipt of a satisfactory check. No member of staff or volunteer will begin work until all necessary checks are complete. In the case of the employment of staff from overseas, every effort will be made to check their background and this will, if possible, include a police check. Verification will be obtained that applicants for teaching posts are not subject to prohibition by the Secretary of State.

The qualifications, career histories, identity, medical fitness or right to work in the UK of all staff will be scrutinised prior to confirmation of their appointment. Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. At least two references will be required, one of them from the previous employer. Responsibility for ensuring that these checks have been undertaken lies with the person making the appointment, usually the Head or the Bursar.

As part of the shortlisting process Culford will be carrying out an online search as part of our due diligence on shortlisted candidates. Shortlisted candidates are informed that online searches may be done as part of due diligence checks.

The School will take all reasonable steps to gain assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation who work with Culford pupils. This includes a requirement to ensure that external bodies have carried out appropriate checks on their staff when taking pupils away on trips. This is covered on the paperwork required before pupils are taken away on a trip.



All Senior Leaders and Managers, including Heads of Department, Governors and Trustees, will have a Section 128 Check.

If a member of staff has been dismissed or removed as a result of a referral the school will inform the DBS. If a teacher has been guilty of professional misconduct then the TRA will be made aware. In Pre-Prep any allegations against people living or working at the premises, or of any other abuse alleged to have taken place on the premises, will be reported to Ofsted as soon as possible and within 14 days.

## **7.1 Training**

The DSL or DPSL will be suitably experienced members of staff with leadership responsibility who will be given training and time to fulfil their roles. The DSL and DPSL have a job description outlining their role. All members of staff and volunteers, who are closely involved with children, are made alert to signs of abuse and how to respond appropriately to allegations or suspicion of abuse. The programme for the induction of new staff and volunteers includes training in child protection procedures, including online safety, and the Prevent Duty. Staff will receive suitable training at least every three years; temporary, part-time and voluntary staff will also attend these sessions. All staff will receive annual updates and measures are in place to check understanding. DSL or DPSLs will receive additional training in multi-agency working, and training for their roles as Child Protection Officers at least every two years in line with the LSCP procedures. Employees and volunteers are also given guidelines on what is and what is not appropriate behaviour in relation to children, particularly in a boarding context, and are made aware of the DfE guidelines on the appropriate use of force. There is clear policy on who is responsible when the DSL is off site.

Training will also be provided on this Child Protection Policy, the Staff Code of Conduct, Behaviour policy including prevention measures for bullying and cyberbullying, whistleblowing, missing children policy, filtering and monitoring systems, and the identity of the DSL and DPSLs; and all staff and volunteers must be given, read and be aware of Part One or Annex A of Keeping Children Safe in Education. Employees and volunteers are made aware of how they should respond to the range of child protection issues that might arise when they are on duty in the Houses. The training of Prefects will include a briefing on appropriate action to take should they receive any allegations or have suspicions of abuse.

The Governing body ensures the school has appropriate filtering and monitoring systems in place and reviews their effectiveness annually. The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

There are clear guidelines for those working in the Early Years setting for the restriction of use of mobile phones and cameras. As children enter the school parents confirm, or otherwise, to give permission to have photos of their child(ren) taken. Photos are only ever taken using school equipment, which is locked away when not in use. Staff are asked to keep their phones locked away when in school. Parents are discouraged from using their mobile phones in the school building and at school events. During school events such as the nativity, a professional photographer comes into school.

## **7.2 Management and Monitoring of Safeguarding**

The work of the DSL or DPSL will be supervised annually by the governor responsible for Safeguarding. This policy 'Child Protection (Safeguarding)' will be reviewed as well as the records of any Child Protection incidents that have occurred in the previous 12 months. The Safeguarding Self-Assessment Tool for Schools as provided by Suffolk Safeguarding Partnership will be completed by the DSL and review of this document by the DSL and Safeguarding Governor will constitute the annual review. This review will be minuted by the Governors who must also read and agree to the amended version of the 'Child Protection (Safeguarding)'.

The School welcomes the Safeguarding Audit undertaken by MIST annually as a tool for further improvement.

### **7.3 Whistleblowing**

All employees must raise with the Head any concerns they may have about the School's practices or the behaviour of colleagues or others, which may put pupils at risk of abuse or serious harm. The Head will discuss the allegation with the LADO. The School provides immunity from retribution and disciplinary action to employees who report any such concerns in good faith. Any concerns regarding the behaviour of DSL or DPSL should be raised with the Head, who will refer it immediately to the Chair of Governors and the Governor responsible for Safeguarding, Victoria Sanderson, and the Local Area Designated Officer.

Any concerns regarding the behaviour of the Head should be referred directly to the Chair of Governors or MIST CEO. The Head will not be informed if the allegation is against them.

Concerns about a member of the Governing Body should be reported directly to the MIST CEO.

Culford School's Whistleblowing Policy is in line with that of our Proprietor, MIST.

[MIST Whistleblowing Policy](#)

In the case of possible serious harm the police should be informed. Anybody can make a referral directly to Children's Services to Customer First, 0808 800 4005.

### **7.4 Levels of Supervision**

All Boarding Houses have at least one member staff/matron in the Houses (or on occasion in the immediate vicinity, such as adjacent Houses or dining hall) twenty four hours per day, seven days a week. At the start of each term rotas are agreed with teams of staff/matrons which also take into account staff supervising school activities and outings. There are always at least two members of staff in residence overnight. Pupil privacy is respected with regard to dormitories, WC and showers, and staff are aware of the need to be visible when on duty but not intrusive to the needs of the pupils. New employees and volunteers receive detailed guidance on performing duties as part of their induction process. It is one of the areas on which new colleagues are assessed during their induction year.

Where pupils are taken on outside visits and excursions, an excursion form must be completed, giving details of the nature of the activity and arrangements for supervision. A risk assessment is attached to the form. An iSAMS print-out of personal and medical details is attached. Consent is only given to the excursion if the person responsible for trips in each school is satisfied with the pupil-teacher ratio and the arrangements for supervision. Pupils travelling on School minibuses are instructed to use seat-belts on all occasions.

Boarding pupils do not have access to staff accommodation, other than when invited for special events as a group, such as a birthday celebration or prefect meeting.

Where additional adults, who are not employees of the School, are supporting an excursion or activity, supervision arrangements will be such that they do not have unsupervised access to children.

### **7.5 One-to-one situations policy**

We recognise that one-to-one work is a component of working with children: tutorials where sensitive management and pastoral care is necessary; music lessons; sports coaching. Under such circumstances staff are expected to use their professional judgement to assess what degree of privacy is necessary. Managers of such areas where one-to-one working is required are expected to exercise appropriate

supervision of colleagues and volunteers and to assess and mitigate any risks. It is recognised that one-to-one situations can make pupils and adults vulnerable.

One to one situations have the potential to make a child/young person more vulnerable to harm by those who seek to exploit their position of trust. Adults working in one to one settings with pupils may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one to one situations are unavoidable, reasonable and sensible precautions are taken. Every attempt should be made to ensure the safety and security of pupils and the adults who work with them.

Pre-arranged meetings with pupils away from the school premises are not permitted unless approval is obtained from their parents and the Head or other senior colleague with delegated authority.

Staff must immediately report any occasions where a child becomes upset or angry in a one-to-one situation, or when the conduct of a one-to-one meeting has caused concern.

## 7.6 Private Fostering

Private foster care occurs when a child under 16 (or under 18 if disabled) is cared for by someone who is not their relative for 28 days or more.

This type of fostering is organised through a private arrangement between the parent and carer. Private fostering requirements **do not apply** if you are a full relation, half relation or related by marriage to the child but may apply to educational guardians in some circumstances.

The [Children Act 1989](#) defines a relative as only a sibling, aunt or uncle, a grandparent or stepparent.

Great aunts or uncles, cousins or a parent's current or former partner are **not defined as relatives**

Parents have a legal duty to notify [Suffolk County Council](#) (or the relevant home LA) in advance about a private fostering agreement and provide details of the child's address. If Culford School becomes aware of a private fostering arrangement, the School also has a legal duty to notify the relevant LA. The relevant LA will follow a pre-defined routine to ensure the Private Fosterer supports the child.

The Designated Safeguarding Lead will inform those with pastoral responsibility of any holiday periods that are longer than 28 days, and ensure boarding pupils arrangements for the summer holiday are known, and report to Suffolk County Council any concerns.

*Reviewed: August 2024*

*By Claire Bentley (Head) and Gavin Reynolds (Designated Safeguarding Lead).*